

8. Updated Action Plan





Table 8 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 provided solutions for some of the actions requested in the latest version of the Action Plan from 2022 E&S Construction Closure Report. Considering the columns:




- “Proposed Deadline” column indicates the stage of the Project where the action should be completed.
- “Concern Status” column identifies where or not the action poses a potential material risk. Thus, “No concerns identified” means pending actions where the IESC has not identified any potential risks and/or delays to the timely completion of the action; “Concerns identified” signifies pending actions where the IESC has evidence to indicate that timely completion of the action is at risk or represents a material risk, for instance due to delays in progress, lack of necessary resources or other technical issues.





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 8. Action Plan Monitoring – Pacífico 2.




No	Proposed Action	Proposed Deadline	Concern Status	Status (Updated 2024)	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. PS: 1	O&M	No concerns identified	Closed in 2023 period.	
2	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. UF: All PS: 6	O&M	No concerns identified	<p>As of December 2024, the Concessionaire had achieved the closure of 18 environmental offsets. Nine are in execution, and two are pending.</p> <p>The offset of Cauca River Nature Reserve Subtraction is pending. The revised obligation was consolidated into two main components: i) The restoration of 350 hectares, which has been underway since 2023 following the signing of a contract with Corporación Biosuroeste and the Agropark. ii) The full purchase of the “La Herradura” property, comprising 587 hectares. Acquisition of this property is expected for 2025.</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	Socioeconomic Compensations	-	-	Closed in 2022 period.	
4	Environmental Sanction Procedures: The Concessionaire has two (2) remaining punitive actions: <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 	O&M	Concerns Identified	<p>No updates were reported during this period regarding the closure of previous sanctioning procedures or the initiation of new ones. To date, four procedures remain ongoing, three with ANLA and one with Corantioquia. Arup considers that the Concessionaire has been diligent in submitting the required information and responding to requests from the authorities.</p> <p>The most recent sanctioning procedure was initiated in 2023, and the Concessionaire has formally requested its</p>	



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	<p>adjustments to the economic evaluation of impacts.</p> <p>Arup requires periodic updates of these processes to track them through next E&S report.</p> <p>UF: 4</p> <p>PS:1</p>			closure. Arup will continue monitoring any developments related to these procedures in the next reporting period.	
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 at 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> <p>PS:6</p>	O&M	No concerns identified	<p>Of 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.	

No	Proposed Action	Proposed Deadline	Concern Status	Status (Updated 2024)	Color code
8	Archeological holders	-	-	Closed in 2022 period.	
9	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, it is important to design methods and strategies that allow to measure the effectiveness of resettlement program and the restauration of previous livelihood conditions. UF: All PS: 5	O&M	No concern identified	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	Mass balance for ZODMES: Arup requests the mass balance of ZODMES quarterly for review. UF: All PS: 3	O&M	No concerns identified	<p>According to the information provided by the Concessionaire, surplus materials from excavations and potential landslides are managed through ZODMEs operated by authorized third parties. Specifically, 2,779.4 m³ from UF1 and UF2 (Peñalisa) and 7,179 m³ from UF5 (Primavera) were disposed of at ZODME La Albania, while an additional 603 m³ from UF5 were taken to ZODME Zanzibar Jose Betancur G. S.A.</p> <p>The Concessionaire has also submitted documentation on the closure status of all ZODMEs used. To date, 11 of the 14 sites have been fully closed with no outstanding permits. Of the three remaining, Hacienda Gazul 2 (Vía Jericó) and La Viuda (Km 5, Vía Fredonia) are awaiting final approval, and La Cortez is still under review, although no material was deposited there in 2024.</p> <p>The action remains on track until the concessionaire shares the balance of mass of the active Zodmes.</p>	
11	Monitoring campaigns schedule: As construction activities have concludes, tehe frequency of monuitoring campaigns is expected to change. Therefore, Arup requests an updated monitoring schedule for O&M phase, taking into account the new	O&M	No concerns identified	During this period, the Concessionaire submitted the air quality and environmental noise monitoring reports conducted in November 2024; however, the monitoring schedules for air, noise, and water quality matrices are still pending submission.	

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	permits that require specific monitoring campaigns and/or reporting. UF: All PS: 3			Therefore, the action is marked as “On Track.”	
12	Retrenchment Plan	-	-	Closed in 2022 period.	
14	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. UF: All PS: 1	Before the end of construction phase	No concerns identified	In compliance with the IFC PS1, the Concessionaire needs to respond to grievances in a determined amount of time to be following the standards. On previous reports, it was documented that until December 2022, there was one (1) grievance that was still open. During this period, the updated matrix of registered grievances was submitted along with supporting documents of actions still pending for the 2024. Arup considers this reflects the Concessionaire’s commitment to handling most grievances in the established time, while providing adequate follow up to specific cases that need further monitoring. Based on the management demonstrated during this period this action will be marked as “Solved.”	
15	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. UF: All PS: 2	-	-	Closed in 2023 period.	
16	GHG emissions: The Concessionaire has shared a document describing Odinsa’s GHG targets. Even though there is information about <i>Concesión La Pintada</i> , the information shared is not related to GHG emissions for the Concessionaire during the reporting period.. Furthermore, there are no explicit mitigation measures considered for GHG reduction as the PS N°3 required.	O&M	No concerns identified	The Concessionaire submitted the GHG inventory for 2024, representing a 4.45% reduction compared to the 2023 baseline. It has complete information about the activities that generate emissions and quantifies them on an annual basis. However, there are some unclear items including the methodology and emission factors that are used.	

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	UF: All PS:3			<p>Although the report does not clearly define the calculation methodology, organizational boundaries, or emission factors applied, during the April 2025 site visit, the Concessionaire reported being in the process of undergoing an audit to achieve ISO 14068 certification for carbon neutrality, suggesting adherence to internationally recognized methodologies in line with PS3 requirements.</p> <p>The strategies implemented for GHG reduction emissions are appropriate and Arup expects further information regarding the methodology used.</p> <p>Other than that, Arup concludes it complies with the PS standard.</p> <p>This action is marked as “On Track.”</p>	
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> <p>UF: All PS: 3</p>	O&M	No concerns identified	<p>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 to water saving.</p> <p>This action is marked as “On Track.”</p>	
18	<p>Waste management: Arup requires the Concessionaire to submit information related to waste management which shall involve generation quantities, disposal quantities, and certifications along the chain of custody and licenses from the third parties involved within the waste management process.</p> <p>UF: All PS: 3</p>	Construction	-	<p>The Concessionaire sent the required documents.</p> <p>Closed in 2023 period.</p>	

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19	<p>Potential new land acquisition process: The Concessionaire kept communications with owners and inhabitants of 6 properties in UF 5- Quiebra de Guamito sector, that could be impacted for land acquisition. For the next period, Arup requests detailed information about this process, including the properties needed to be acquired and the communications held with the affected people.</p> <p>UF: 5</p> <p>PS: 5</p>	O&M	No concerns identified	<p>Since mid-2022, a landslide in UF5 disrupted local transit, especially in Santa Barbara. The road has since been restored. Nine properties were to be acquired; previously, six were in process, and three were pending. However, current data from the Concessionaire is inconsistent, mentioning both six and eight acquisitions. Compensation agreements were reached with five social units, and payments made to four. Arup has also not received information on the social units' current living conditions or resettlement support and requests consistent updates until all compensations finalize. For the next monitoring period, the Concessionaire is expected to provide a descriptive report 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 of the social units.</p> <p>Also, the Concessionaire is advised to continue informing Arup on the progress of land acquisition and socioeconomic compensations.</p> <p>Keeping this information into account, this action is marked as "On track".</p>	
20	<p>Labor and Working Conditions documents: For the IESC to review compliance with PS2 the Concessionaire must continue submitting information about trainings, inductions, minutes of COPASST and Social Committee, internal petitions, complaints, claims, and suggestions.</p> <p>PS: 2</p>	O&M	No concerns identified	Closed in 2022 period.	
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 highlights this initiative; however, Arup wants to remember that the ESMS required by Performance Standard 1 requires a more robust and extensive stakeholder</p>	O&M	No concerns identified	Closed in 2023 period.	

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	engagement process than the required by ISO 14001. PS: 1				
22	ESMS's policy: Arup requests the policy that is going to be used during 2023 and the O&M phase with the statement of commitment with values, principles, objectives, and goals. PS: 1	O&M	No concerns identified	Closed in 2023 period.	
23	Requests made by La pintada community: During August 2022, a nearby community of La Pintada blocked the road alleging 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. PS: 1	O&M	No concerns identified	No update was made on the situation with the La Pintada Community for this period. Arup expects, if any changes to the situation arise, to have follow-ups in the next reports. This action is marked as "On Track."	
24	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. PS: 1	O&M	No concerns identified	Closed in 2023 period.	