







6. Action Plan



As of December 2024, the Concessionaire has completed some of the remaining actions from the last biannual report Action Plan. The Concessionaire continues efforts to close gaps with actions currently in progress. The Action Plan has been updated based on the site visit conducted in January 2025, and the corresponding desktop review. The status of the activities is shown in the table below and has been evaluated using the following color coding.



Table 12. Action Plan update

ID	Proposed Action	Deadline	Arup's Observations on Status (up to June 2024)	Status
1	<p>Property Acquisition- Compensation mechanisms: The Concessionaire is complying with the resettlement processes and land acquisition according to Resolution No. 545, 2008 and Appendices 7 and 8 of the CA. The Concessionaire should evaluate economic, legal, and social aspects of the new resettlement properties and follow up the adaptation of their owners for at least one year.</p> <p>Arup recommends the Concessionaire to report, for the following period, all the strategies that are being implemented for relocation processes in this UF, as well as any progress with the EER regarding delays in the construction schedule and the results of the negotiation process (“amigable componedor”).</p> <p>UF: 5 PS/EP:PS5</p>	Biannual – Next E&S report.	<p>There were no updates for this monitoring period. Arup recommends the Concessionaire to provide information or evidence on this regard for the upcoming period. Resettlement has finished for SUs for properties required for the First Roadway. However, the process has not finished for at least five SU located in land required for the Second Roadway design and for five SU in UF5 that will be compensated through the land acquisition plan.</p> <p>This action is marked as “on track” until all resettlements are finished, and the Concessionaire completes monitoring procedures.</p>	●
2	<p>Archaeology: On June 18th, 2019, archaeological rescue activities started in the area denominated “El Indial” (Tesalia intersection UF2 – UF3.1). Considering that it is not possible to estimate a date of termination of the archaeological activities, since it depends on the findings of each exploration, the Concessionaire has an EER approved on December 20th, 2019, that gives an additional two months and 24 days to complete works once archaeological activities are completed.</p> <p>Regarding La Caucana archeological site, and considering the Concessionaire did not monitor the archeological material in an appropriate way, Arup recommends the Concessionaire to continue reporting the progress and management of the archaeological activities and findings.</p> <p>UF: All PS/EP:PS8</p>	Biannual – Next E&S report.	<p>The activities have continued given Resolution 0401 for archeological material recovered for UF2.3, 3.1, 3.2 and 4; and the Resolution 7478 in UF5.</p> <p>The Concessionaire continued performing activities such as monitoring, public archeology, and laboratory inventories to better safeguard archeological chance findings and sites. Next semester, we strongly recommend the Concessionaire to share the protocol in case for chance finding that may occur during O&M stage.</p> <p>The action is marked “on track” until the ICANH approves the closure of the Preventive Archaeology Programs 0401 and 7478.</p>	●

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3	Environmental sanctioning procedure - Trompeta Bridge: In November 2018, ANLA opened a sanctioning procedure related to the construction of the Trompeta bridge piles in UF1. It is within the licensed area, but the construction activity was not allowed in the environmental license. In Arup's opinion, considering that UF1 construction activities were finished, the sanctioning procedure does not represent a high risk in the development of the project. Arup recommends the Concessionaire reviews the legal process, reports any progress, and shares the response issued to the environmental authority for the next monitoring report. UF: 1 PS /EP: PS1	Biannual – Next E&S report.	There has not been material progress since November 2023. No new updates were reported up to December 2024. Arup will continue tracking this process until its official closure.	
5	Working conditions – work force layoff	Biannual – Next E&S report.	Action solved during the January-June 2024 period.	
6	Water treatment in Tesalia Tunnel	N/A	Action solved during the January-June 2023 period.	
7	Water management – El Cairo aqueduct: The Concessionaire received the PQR No. 10-78 (May 5 th , 2019) related to the petition of information of the community El Cairo about the water flow of a waterbody near the entrance portal of the Tesalia Tunnel. Arup recommends the Concessionaire to provide all the technical studies about the watercourse lithology and water quality characterization, and to report all the implemented measurements that guarantee water availability and quality. UF: ALL PS/EP: PS1, PS3	Immediately – Next Technical report.	The Concession delivered the plans and designs of the catchment, conduction, and storage works by catchment point, considering the granted flow. Corpocaldas approved the works for the use of the granted flow. This action is marked as “Solved”; however, Arup will keep monitoring this action in future reports	
8	Environmental sanctioning procedure- ready mix concrete plant: The Concessionaire is currently undergoing an environmental sanctioning procedure with ANLA (Resolution 02094, October 21 st , 2019) that has not ended in economic sanctions but are a risk for the project's environmental compliance and reputation. This sanction procedure was due to the operation of a ready-mix concrete plant not approved in the environmental license of UF2. UF: ALL PS/EP: PS1, PS3	Biannual – Next E&S report.	There has not been material progress since March 2023. No new updates were reported up to December 2024. This action remains “on track.”	
10	Decrease of flow rates near the Tesalia Tunnel: In August 2020, the communities (including El Cairo) raised several PQRS related to an alleged decrease in groundwater flow rates and the water supply near the Tesalia Tunnel. Immediately, the Concessionaire activated the mitigation measures approved in the Environmental License to guarantee communities water access and start developing a hydrogeological study to determine if this impact is caused by the construction of the Tunnel. Arup recommends the Concessionaire to continue to provide the information related to (i) the hydrological and technical studies that determine the cause, impacts, and risks, (ii) mitigation and compensation implemented measures, (iii) interagency strategies, and the (iv) communications with environmental authorities, communities, and stakeholders. It is necessary to	Immediately- Next Technical report.	Action solved during the January-June 2024 period.	

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	consider a scenario analysis and action plan in case of this issue is scaled up to a Court and the precautionary principle is declared. UF: 2.2 PS/EP: PS1-3-4			
15	Land acquisition and offset KPI near the Tesalia tunnel: During a previous site visit performed by Arup, the Concessionaire reported that it was contemplating the acquisition of land near the Tesalia tunnel to reduce water pressure in the area due to crop cultivation. They also commented on implementing environmental offsets in that same property. The Concessionaire proposes this measure to contribute to the prevention of future impacts to the water body. This is also expected to contribute in some manner to the ecological restoration of the area. Arup recommends impact indicators for this measure if it is allowed and compensations for forestry use to be implemented. They can be considered for water quantity and flows, as well as for the development of plant species (e.g., percentage of survival). PS/EP: PS3-4	Biannual – Next E&S report.	Action solved during the January-June 2024 period.	
19	Update on Environmental Offsets: For the previous period, Arup did not receive an update on the status of the Concessionaire's environmental compensation decreed by ANLA and local authorities. This is important for compliance with both national and international standards. Even though there are no effects on the schedule or fines up to June 2022, Arup strongly recommends the Concessionaire to provide this information to validate the development of each of the compensation measures agreed by the Concessionaire. UF: All PS/EP: PS6	Biannual – Next E&S report.	<p>For the second semester of 2024, the Concessionaire continued to address pending requirements to advance property acquisitions for environmental offsets.</p> <ul style="list-style-type: none"> Progress was made regarding the Buenavista zone, consisting of the Soledad or Paraguay and Paraguay 2 lots. The Concessionaire submitted responses to observations raised by the Supervisor and is awaiting final approvals to move forward with the acquisition process. Efforts to address non-objection requirements for other offsets are ongoing, with updated reports submitted to the Prior Environmental Approval Committee as part of the approval process for properties like Buenavista and El Chumbimbo. No additional measurable conservation activities, such as planting or restoration, were reported for this period. <p>The action remains “on track,” pending the completion of property acquisitions and initiation of measurable conservation actions as required by PS6. Arup will continue requesting updates to validate progress and compliance with decreed environmental offsets and associated budgets.</p>	

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20	Control over forestry use	NA	Action solved during the July-December 2023 period.	●
23	H&S Accidents	Biannual – Next E&S report.	Action solved during January – June 2024 period.	●
25	<p>Fauna protection and monitoring: Aside from the wildlife repelling and rescue, Arup found no information regarding the implementation and effectiveness of fauna passages along the Project. Arup considers it as one of the most important parts of the biodiversity assessment, as it can measure the impacts on biodiversity caused by the Project construction. Therefore, Arup strongly recommends the Concessionaire submits this information, including an analysis of the obtained results.</p> <p>UF: All PS/EP: PS6</p>	Biannual – Next E&S report.	<p>During this semester, no progress was made on the construction of wildlife crossings as the permit from Corantioquia remains pending. The designs are complete, but their approval and feasibility determination by the environmental authority are still outstanding. Arup finds the delays concerning, as they hinder urgent measures to mitigate wildlife collisions. It is recommended for the Concessionaire to continue following up with Corantioquia to expedite the process and address funding challenges to ensure construction begins promptly once approval is obtained.</p> <p>The action is marked as “on track” until construction of all wildlife crossings is reported.</p>	●
27	<p>Exotic invasive species <i>Litobathes catesbeianus</i></p> <p>UF: All, specially UF2.2 PS/EP: PS6</p>	Biannual – Next E&S report	The action was marked as “solved” during the July-December 2023 period, however, Arup will continue to require reports on presence of the bullfrog specie in the Project.	●
28	Internal Grievance Mechanism: PS/EP: PS2	Biannual – Next E&S report	Action solved during January – June 2024 period.	●
29	<p>GHG emissions: The GHG emissions calculation should be wider, including more aspects rather than only fossil fuel consumption. The quantification should be based on international methodologies such as GHG Protocol and include a document of data interpretation and the Concessionaire’s good practices. Also, considering the IFC PS3 requirements and the stage of the Project, Arup recommends the Concessionaire proposes and communicates Arup of cost-effective alternatives in implementation or to be implemented to reduce GHG emissions during the operation of the Project.</p> <p>UF: All PS/EP: PS3</p>	Biannual – Next E&S report	As of December 2024, Arup received confirmation from the Concessionaire that solar panels have been implemented, currently providing over 30% of the energy demand for fixed O&M facilities. This is a positive achievement for the Project. Additionally, Arup continues to recommend that the Concessionaire expands the scope of the quantification methodology to align with EPIII recommendations (e.g., GHG Protocol). This would be highly beneficial for the Project from a reputational and commercial perspective, ensuring full compliance with IFC PS3.	●
30	Water consumption	N/A	Action solved during the July-December 2023 period.	●
35	Use of glyphosate in weeds management	N/A	Action solved during the January-June 2023 period.	●

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37	Activities to ensure mitigation of impacts to social actors affected by land acquisition processes: PS/EP: PS5, EP2, EP3	Biannual – Next E&S report	Action solved during the January-June 2024 period.	●
38	Archeological Licenses	N/A	Action solved during the January-June 2023 period.	●
39	UF3.1 archeological updates: PS/EP: PS8, EP2, EP3	Biannual – Next E&S report	Action solved during the January-June 2024 period.	●
40	<p>Disaster Management Plan training: Arup considers that the Project has adequate measures for prevention and action in case of emergencies and disasters. However, the IESC considers that there could be improvements in the dissemination of information. Arup recommends the Concessionaire provides updated information or evidence of trainings associated with the Disaster Management Plan and Contingency Plan, and to report to the community at least once a year on impacts, risks or other matters that may affect them.</p> <p>UF: All PS/EP: PS1, EP2, EP3</p>	Biannual – Next E&S report	<p>Between June and December 2024, the Concessionaire performed emergency drills and trainings with the workers and local communities, communicating different strategies within the Project's emergency plan. Evidence of implementation was shared and reviewed by Arup, concluding a compliance with the action 40 of the ESAP. Arup recommends the Concessionaire continues performing drills with the Project staff and the local communities.</p> <p>This action is marked as "Solved."</p>	●
41	Identification of Climate Change Risk Assessment for the Project	Biannual – Next E&S report	Action solved during the January-June 2024 period.	●
42	Air pollution prevention and road safety	Biannual – Next E&S report	Action solved during the January-June 2024 period.	●
43	<p>Current update on Zodne Saibo contingency: The Concessionaire informed that it has not been possible to properly address the contingency because there is no authorization from the owner to access the property.</p> <p>UF: 4 PS/EP: PS3</p>	Biannual – Next E&S report	The Concessionaire confirms that the final works to resolve the Saibo contingency have been underway since November 2024. They expect to complete the tasks and request closure from the oversight body and the environmental authority. Arup considers this progress significant and will close the action once the pertinent approvals are received.	●
4	Soil protection improvements	N/A	Action solved during the January-June 2024 period.	●
45	Water occupation- La Ley bridge	N/A	Action solved during the January-June 2024 period.	●
46	Displacement: Arup acknowledge that there are 5 social units remain to be resettled and will be compensated trough the LAP. However, no information has been shared by the Concessionaire related. The Concessionaire should clarify whether the information does not exist because of the phase of the	Biannual – Next E&S report		●

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	resettlement of these 5 SU or shared the information (minutes, social documents of the SU, etc.)			