

E&S Action Plan (ESAP)					
Project Name:	Troncal del Magdalena I	Project ID:	14522-01	Category:	A
Country:	Colombia	Sector:	TRANSPORT	Completion %:	0%
Environmental Leader Specialist:	Dousdebés, Carolina	Social Specialist:	Cafruni, Milena		

No.	Product/Deliverable	Completion Date
PS1: Assessment and Management of Environmental and Social Risks and Impacts		
1.1 Environmental and Social Management System		
1.1.1	Develop an Environmental, Social, Health and Safety Assurance Plan for the Project's construction phase, which: (i) includes all the necessary elements from the Integrated Management System (IMS); (ii) includes environmental social, health and safety verification measures for all the activities to be carried out by the Client, its contractors, subcontractors and main suppliers; (iii) defines its objectives, scope, responsibilities; (iv) describes the plan implementation tools such as (a) labor audits, (b) field inspections, (c) verification protocols, (d) equipment certification, (e) competence of operators, (f) training needs, (f) key performance indicators (KPI), (g) follow-up and monitoring actions, and (h) reporting obligations (including the frequency), among others; (v) focuses in field inspections; and (vi) considers third-party support (consultants, experts and technical assistance) when deemed appropriate.	
a.	Environmental, Social, Health and Safety Assurance Plan for the construction phase.	Prior to first disbursement.
1.1.2	Implement the Environmental, Social, Health and Safety Assurance Plan for the construction phase.	
a.	Evidence of the implementation.	As part of the Environmental and Social Compliance Report (ESCR).
1.1.3	Develop an Environmental, Social, Health and Safety Assurance Plan for the operations and maintenance (O&M) phase of the Project with characteristics similar to the one drafted for the Project's construction phase.	
a.	Environmental, Social, Health and Safety Assurance Plan for the O&M phase.	30 days prior to the start of the O&M phase.
1.1.4	Implement the Environmental, Social, Health and Safety Assurance Plan for the O&M phase.	
a.	Evidence of the implementation.	As part of the ESCR.
1.2 Policy		
1.2.1	Update the Environmental and Social Management System ("ESMS") including: (i) policies related to the identification and management of social impact; (ii) stakeholder engagement protocols; (iii) contextual risks analysis and assessment; and (iv) specific commitment to non-discrimination, inclusion and gender equality and zero tolerance to gender-based violence and harassment (GBVH).	
a.	Updated ESMS manual.	Prior to first disbursement.
1.2.2	Disseminate the ESMS manual.	
a.	Evidence of dissemination.	30 days after first disbursement.
1.2.3	Adopt the ESMS.	
a.	Evidence of its adoption.	30 days after the first disbursement and thereafter as part of the ESCR.
1.3 Identification of Risks and Impacts		
1.3.1	Update the E&S impact matrix for the construction phase of the Project to include: (i) management measures, to avoid, minimize or compensate the undesired impact; (ii) control measures, as required by the EIA, licenses, the Adaptation Plan of the Environmental Guide "PAGA" (as per its acronym in Spanish) and other E&S studies; and (iii) performance measures, in accordance with the IFC's Environmental, Health and Safety ("EHS") Guidelines.	
a.	E&S impacts updated matrix for the Project construction phase.	Prior to first disbursement.
1.3.2	Develop an E&S impacts matrix for the O&M phase of the Project with similar characteristics to the one developed for the construction phase.	
a.	E&S impacts matrix for the O&M phase of the Project.	30 days prior to the start of the O&M phase.

1.3.3	Update the quick assessment of the cumulative impacts following IDB Invest's Practical Guide for Cumulative Impact Assessment and Management in Latin America and the Caribbean.	
a.	Updated Cumulative Impacts Assessment.	Prior to first disbursement.
1.3.4	Implement the Cumulative Impacts Mitigation Plan.	
a.	Evidence of the implementation.	As part of the ESCR.
1.4 Management Programs		
1.4.1	Develop an E&S management program for contractors applicable to the construction phase of the Project which: (i) includes E&S objectives; (ii) considers KPIs; and (iii) follows the guidelines in the International Finance Corporation's ("IFC") Good Practice Note: Managing Contractors' Environmental and Social Performance.	
a.	E&S Management Program for contractors (construction phase).	30 days prior to the start of the construction phase.
1.4.2	Implement the E&S Management Program for contractors (construction phase).	
a.	Evidence of the implementation	As part of the ESCR
1.4.3	Develop an E&S management plan for the contractors applicable to the Project's O&M phase with similar characteristics to the one developed for the construction phase.	
a.	E&S Management Program for contractors (O&M phase).	30 days prior to the start of the O&M phase.
1.4.4	Implement the E&S Management Program for contractors (O&M phase).	
a.	Evidence of the implementation.	As part of the ESCR.
1.5 Organizational Capacity and Competency		
1.5.1	Keep an organizational structure that defines roles, responsibilities, and authority levels for implementing and monitoring the contractors' and subcontractors' ESMS performance, during the construction phase of the Project.	
a.	Project Organization Chart for the construction phase.	30 days prior to the start of the construction phase.
1.6 Emergency Preparedness and Response		
1.6.1	Prepare an Emergency Preparedness and Response Plan (EPRP) specific for the construction phase which: (i) considers the most probable risk scenarios (even those that could affect the neighboring communities or cause civil or labor unrest); (ii) includes any of the most important potential emergencies (including climate risk and natural disasters); (iii) defines the functions and responsibilities of (including those of its contractors and subcontractors); (iv) defines the flow of internal and external communications (with community leaders and governmental authorities) during emergencies; (v) details the response team to be used and the protocols to be followed during an emergency; and (vi) is based on (a) the Good International Industry Practices ("GIIPs"), and (b) the recommendations applicable in the IFC's Environmental, Health, and Safety ("EHS") General Guidelines and (c) the EHS Guidelines for Toll Roads.	
a.	Emergency Preparedness and Respond Plan for the construction phase.	30 days prior to the start of the construction phase.
1.6.2	Implement the Emergency Preparedness and Respond Plan for the construction phase.	
a.	Evidence of the implementation.	As part of the ESCR.
1.6.3	Develop an Emergency Preparedness and Response Plan specific for the O&M phase, with similar characteristics to the one drafted for the construction phase.	
a.	Emergency Preparedness and Respond Plan updated for the O&M phase	30 days prior to the start of the O&M phase
1.6.4	Implement the Emergency Preparedness and Response Plan for the O&M phase.	
a.	Evidence of the implementation.	As part of the ESCR.
1.7 Monitoring and Review		
1.7.1	Develop an environmental and social legal matrix for the Project's construction, which: i) includes all national environmental, social, and occupational health and safety ("OHS") regulatory requirements; ii) includes contractual financing obligations and requirements; and iii) enables the timely review and monitoring of such obligations and requirements.	
a.	E&S legal matrix (construction phase).	30 days prior to the start of the construction phase.
1.7.2	Implement an E&S legal matrix for the Project's construction phase.	
a.	Evidence of the implementation.	As part of the ESCR.
1.7.3	Develop an E&S legal matrix for the O&M phase of the Project with similar characteristics to the one developed for the construction phase.	
a.	E&S legal matrix (O&M phase).	30 days prior to the start of the O&M phase.
1.7.4	Implement an E&S legal matrix for the Project's O&M phase.	

a.	Evidence of the implementation.	As part of the ESCR.
1.8 Stakeholder Analysis and Stakeholder Engagement Planning		
1.8.1	Develop a Stakeholders Engagement Plan ("SEP") for the Project's construction phase including: (i) a map of the stakeholders; (ii) protocols for its periodic updating; and (iii) strategies, tools, and mechanisms to share information and make consultations with each group of the stakeholders in a manner that is culturally appropriate.	
a.	Stakeholder Engagement Plan (construction phase).	Prior to first disbursement.
1.8.2	Implement a Stakeholder Engagement Plan.	
a.	Evidence of the implementation.	As part of the ESCR.
1.8.3	Develop a Stakeholders Engagement Plan for the O&M phase of the Project with similar characteristics to the one developed for the construction phase.	
a.	Stakeholder Engagement Plan (O&M phase).	30 days prior to the start of the O&M phase.
1.8.4	Implement the Stakeholder Engagement Plan for the O&M phase.	
a.	Evidence of the implementation.	As part of the ESCR.
1.9 Gender Risks		
1.9.1	Develop a Gender Risk Plan including adequate prevention and management measures to: (i) ensure female employee safety, based on the type of task carried out (jobs in isolated areas, night shift, work environment, transportation); (ii) guarantee exclusive gender-based restrooms; (iii) minimize the risk of social conflict and GBV; (iv) prevent the risk of sexual exploitation of children, women and other vulnerable groups; and (v) prevent the spread of transmissible diseases and infections.	
a.	Gender Risk Plan	30 days after the start of the construction phase.
1.9.2	Implement the Gender Risk Plan.	
a.	Evidence of the implementation.	As part of the ESCR.
1.9.3	Develop a Code of Conduct applicable to employees, contractors, and subcontractors, which includes provisions related to: i) the prevention of gender-based violence and harassment ("GBVH"); ii) the explicit prohibition of sexual and psychological harassment; and iii) types of conduct with the surrounding communities.	
a.	Code of Conduct.	Prior to first disbursement.
1.10 Grievance Mechanism for Affected Communities		
1.10.1	Update the Customer Service Program to ensure: i) culturally appropriate access for affected communities and other stakeholders; ii) the proper and timely registration, analysis, assessment, and response to all communications received; iii) timely resolution with the shortest possible response times for queries, grievances, claims and suggestions ("PQRS", as per its acronym in Spanish) filed by vulnerable communities or people and resettled persons; (iv) anonymity and confidentiality of those filing complaints; and v) that complaints of gender-based violence ("GBV") and harassment are adequately addressed.	
a.	Updated Customer Service Program.	Prior to first disbursement.
1.10.2	Implement the Customer Service Program.	
a.	Evidence of the implementation.	As part of the ESCR.
1.11 Climate Change Exposure		
1.11.1	Update the risks and opportunities assessment to identify adaptation measures to reduce such risks and define other mitigation measures so as to: (i) ensure that the Project incorporates the necessary controls in the event of floods and waterflows, thus preserving human life and assets; (ii) ensure the existence and dissemination of the protocols in the event of natural disasters, including at least earthquakes and floods; and (iii) identify the related training needs.	
a.	Climate Change Assessment Study.	Before the first disbursement and thereafter as part of the ESCR.
1.11.2	Implement the Measures in the Climate Change Assessment Study.	
a.	Evidence of the implementation.	As part of the ESCR.
PS2: Labor and Working Conditions		
2.1 Working Conditions and Terms of Employment		
2.1.1	Develop a Code of Conduct that (a) describes the group of principles, values, rules, labor expectations, behaviors and relationship for its payroll employees, and those of its contractors and subcontractors; (b) includes explicit mentions of zero tolerance to the discrimination, sexual and moral harassment and Gender Based Violence and Harassment ("GBVH"); and (c) is in line with: (i) the Colombian regulations; (ii) the corporate policies and requirements; (iii) IDB Invest's Sustainability Policy; (iv) IDB Invest's Gender Risk Assessment Tool; and (v) any provision related to the prevention of GBVH, inflow management and health and safety, among others.	

a.	Code of Conduct.	Prior to the first disbursement.
2.1.2	Implement the Code of Conduct.	
a.	Evidence of the implementation.	As part of the ESCR.
2.2 Occupational Health and Safety		
2.2.1	Develop an OHS Management Plan for construction activities, including the following requirements: i) on-site inspections at different sites to assess OHS conditions and adequately identify opportunities for improvement; ii) identification of any unmitigated risks; iii) protection of workers from physical and traffic hazards; and (iv) process improvements in (a) safety risk identification and communication (b) equipment operator competency assessment and certification, (c) equipment safety inspections, emergency response protocols and communications, and (d) active on-site health and safety monitoring.	
a.	OHS Management Plan for construction activities.	30 days prior to the start of the construction phase.
2.2.2	Implement the OHS Management Plan for construction activities	
a.	Evidence of the implementation.	As part of the ESCR.
2.2.3	Develop an OHS Management Plan for the O&M activities similar to the one developed for the construction phase.	
a.	OHS Management Plan for O&M activities.	30 days prior to the start of the O&M phase.
2.2.4	Implement the OHS Management Plan for O&M activities.	
a.	Evidence of the implementation.	As part of the ESCR.
2.3 Internal Grievance Mechanism		
2.3.1	Update the Internal Grievance Mechanism ("IGM"), to include: i) a list of the channels through which complaints and concerns may be submitted (including confidential, anonymous, and GBV-specific complaints); ii) a strategy for disseminating the mechanism; iii) a system for registering and tracking complaints; iv) KPIs to enable monitoring of the mechanism's performance; v) specific provisions to ensure that GBVH-related complaints are adequately addressed using a victim-centered approach; and vi) a commitment to non-retaliation.	
a.	Updated Internal Grievance Mechanism.	Prior to first disbursement.
2.3.2	Disseminate the Internal Grievance Mechanism among payroll employees and contractors.	
a.	Evidence of dissemination.	Before the first disbursement and after that as part of the ESCR.
2.3.3	Implement the Internal Grievance Mechanism.	
a.	Evidence of the implementation.	As part of the ESCR.
2.4 Workers Engaged by Third Parties		
2.4.1	Develop an Accommodation Conditions Standard for employees, contractors, and subcontractors, which sets out, among other aspects: i) minimum requirements to be met (maximum number of workers per dormitory, recreational space, Wi-Fi availability, etc.); ii) minimum hygiene and cleanliness conditions; iii) safety requirements; and iv) monitoring, reporting, and registration procedures to verify that the above conditions have been met.	
a.	Accommodation Conditions Rulebook for the employees, contractors and subcontractors	30 days prior to the start of the construction phase
2.4.2	Disseminate the Accommodation Conditions Standard.	
a.	Evidence of dissemination.	As part of the ESCR.
2.4.3	Implement and monitor the implementation of the Accommodation Conditions Standard.	
a.	Evidence of the implementation.	As part of the ESCR.
2.5 Retrenchment		
2.5.1	Develop a Retrenchment Plan to support the workers in the processes of job relocation and reinsertion into the labor market.	
a.	Retrenchment Plan.	30 days after the first disbursement.
2.5.2	Implement the Retrenchment Plan.	
a.	Evidence of the implementation.	As part of the ESCR.
PS3: Resource Efficiency and Pollution Prevention		
3.1 Water and Energy Consumption		

3.1.1	Develop a Resource Efficiency Plan for the Project's construction phase including: (i) an efficiency strategy; (ii) procedures to identify consumption, demands and saving opportunities; (iii) implementation programs; and (iv) a program to follow up on and assess the proposed reduction measures.	
a.	Resource Efficiency Plan for the construction phase.	90 days after the start of the construction phase.
3.1.2	Implement the Resource Efficiency Plan for the construction phase.	
a.	Evidence of the implementation.	As part of the ESCR.
3.1.3	Develop a Resource Efficiency Plan applicable to the Project's O&M phase with similar characteristics to the one developed for the construction phase.	
a.	Resource Efficiency Plan for the O&M phase.	30 days prior to the start of the O&M phase.
3.1.4	Implement the Resource Efficiency Plan for the O&M phase.	
a.	Evidence of the implementation.	As part of the ESCR.
3.2 Greenhouse Gases		
3.2.1	Develop an inventory of direct (scope 1) and indirect (scope 2) GHG emissions for the Project construction phase.	
a.	Annual inventory of GHG emissions (construction phase).	As part of the ESCR.
3.2.2	Develop an inventory of direct (scope 1) and indirect (scope 2) GHG emissions for the O&M phase of the Project.	
a.	Annual inventory of GHG emissions (O&M phase).	As part of the ESCR.
3.3 Pollution Prevention		
3.3.1	Draft a technical study to identify, document and assess any potential environmental liability in the Corridor, which was not solved by the prior concessionaire.	
a.	Technical study of environmental liabilities.	180 days after the start of the construction phase.
3.3.2	Develop an Environmental Management Plan for Road Paving, Repaving and Painting, which: (i) describes the measures and controls to be implemented; (ii) complies with the provisions of Colombian regulations and the environmental instruments (EIAs, PAGA, etc.); and (iii) follows the provisions in the IFC's EHS Guidelines for Toll Roads.	
a.	Environmental Management Plan for Road Paving, Repaving and Painting.	30 days prior to the start of the O&M phase.
3.3.3	Implement the Environmental Management Plan for Road Paving, Repaving and Painting.	
a.	Evidence of the implementation.	As part of the ESCR.
4.3.4 Pesticide Use and Management		
3.4.1	Verify that, if the road easement maintenance activities require pesticides, they do not consider the use of products included in categories "Ia" (extremely hazardous) and "Ib" (highly hazardous) of the World Health Organization's (WHO) Recommended Classification of Pesticides by Hazard.	
a.	Evidence of the verification of pesticide use.	As part of the ESCR.
PS4: Community Health, Safety and Security		
4.1 Community Health and Safety		
4.1.1	Develop a Community Health and Safety Plan, containing, among others, measures to: (i) safely transport and manage hazardous waste and materials; (ii) manage road user impacts, including road regulations and speed control to ensure minimal disruption to the regular traffic flow and reduce the risk of accidents; (iii) minimize the risk of social conflict and GBVH; (iv) prevent the risk of further sexual exploitation of children, women, and other vulnerable groups due to potential arrival of migrant workers in relation to the Project; and (v) prevent the spread of communicable diseases due to the potential arrival of migrant workers in relation to the Project.	
a.	Community Health and Safety Plan.	30 days after the start of the construction phase.
4.1.2	Implement the Community Health and Safety Plan.	
a.	Evidence of the implementation.	As part of the ESCR.
4.2 Hazardous Materials Management and Safety		
4.2.1	Update the OHS Management Programs to manage hazardous materials in order to include the following aspects: (i) the need to maintain the inventory of hazardous materials up-to-date; (ii) the procedures for hazardous materials management; and (iii) determination of storage areas.	
a.	Updated OHS Management Programs.	30 days prior to the start of the construction phase.
4.3 Security personnel		
4.3.1	Prepare a Security Risk Assessment including the identification of: (i) potential security and violence risks (group or collective violence, violent crimes and retaliation) and other contextual risks; (ii) analysis of any additional risks arising from the security measures implemented for the people inside and outside the facilities; and (iii) the needs for security	

	personnel training and equipment.	
a.	Security Risk Assessment Report.	30 days prior to the start of the construction phase.
4.3.2	Develop a Security Plan to manage private security forces, which: i) contains measures to avoid potential harm to employees, communities, and other stakeholders; ii) is aligned with the IFC GOOD PRACTICE HANDBOOK "Use of Security Forces: Assessing and Managing Risks and Impacts Guidance for the Private Sector in Emerging Markets"; iii) is applicable to contractors and subcontractors; iv) includes formal procedures for reporting, responding to, and documenting security incidents; v) contains training requirements that include use of force and GBVH prevention and management; vi) includes procedures for reviewing security contractor security records; and vii) includes procedures for screening security guard applicants.	
a.	Security Plan.	Prior to first disbursement.
4.3.3	Communicate and train relevant stakeholders on the Security Plan.	
a.	Evidence of the communication and training.	30 days after signing the loan agreement.
4.3.4	Generate an agreement with the National Highway Police, in line with the principles established in the Security Policy and the Security Management Plan.	
a.	Agreement with the National Highway Police.	30 days after signing the loan agreement.
PS5: Land Acquisition and Involuntary Resettlement		
5.1 Resettlement and Livelihood Restoration Planning and Implementation		
5.1.1	Develop a Land Acquisition, Compensation and Resettlement Framework ("LACRF") which, (a) describes the principles and measures to be implemented for all the Persons affected by the Project ("PAP"), landowners, persons with recognized or recognizable legal rights on the land and assets they occupy, and informal settlers without any legal or recognizable right over the plot impacted by the land acquisition process; and (b) includes: (i) Resettlement Action Plans ("RAP"); (ii) Livelihood Restoration Plans ("LRP") for each Social Unit; (iii) a procedure to address the expropriation and resettlement process underway commenced by the prior concessionaire; (iv) a procedure to acquire the necessary properties for the Project which are under a restitution claim (resulting from the armed conflict); and (v) a Stakeholder Engagement Plan to consult with the PAP and to report on the implementation of the LACRF; and (vi) conditions guaranteeing (c) the significant involvement of women in stakeholder engagement and consultation activities; and (d) the access of women to land acquisition processes and the resettlement, compensation and livelihood restoration programs.	
a.	Land Acquisition, Compensation and Resettlement Plan Framework ("LACRF").	30 days after the start of the construction phase.
5.1.2	Implement the Land Acquisition, Compensation and Resettlement Plan Framework ("LACRF").	
a.	Evidence of the implementation.	As part of the ESCR.
5.1.3	Develop a Land Acquisition and Resettlement Monitoring Program including independent monitoring of the implementation of the RAP and the LRP.	
a.	Land Acquisition and Resettlement Monitoring Program.	Prior to the first disbursement.
5.1.4	Implement the Land Acquisition and Resettlement Monitoring Program.	
a.	Evidence of the implementation.	As part of the ESCR.
5.1.5	Perform a final independent audit to assess the success of the RAP to: (i) assess whether the livelihoods and life conditions of the persons affected by the Project who were physically or economically displaced have improved or have at least been restored; and (ii) if necessary, propose corrective actions to reach the pending objectives.	
a.	External audit of the RAP.	Once a year, from 3 up to 5 years after, the Land Acquisition and Resettlement Monitoring Program has been implemented.
5.1.6	Prepare a report that: (i) characterizes the socioeconomic and landholding conditions of the persons affected by the interruption of the land acquisition and resettlement processes begun by the prior concessionaire; (ii) assesses the impacts on their livelihoods of the delays in compensation payments; (iii) identifies and characterizes all the Social Units ("SU") affected with land acquisition processes begun but not concluded by the prior concessionaire; (iv) describes the current life conditions and livelihoods of the PAP and compares them to the situation prior to the land acquisition process; and (v) provides information on the impacts that the delays in the compensation payments may have generated in terms of the present value of the payment and pending compensations and the revenues and benefits derived from the ongoing use of the last and resources.	
a.	Characterization report of the SU with interrupted land acquisition processes.	30 days after the start of the construction phase.
5.2 Compensation and Benefits for Displaced Persons		
5.2.1	Implement the support program for the Persons Affected by Projects ("PAP"), when applicable.	
a.	Evidence of the implementation of the support program for the PAP.	As part of the ESCR.

5.2.2	Develop a technical study to assess the land acquisition and resettlement processes carried out by the prior concessionaire as required by Colombian legislation and IDB Invest Sustainability Policy.	
a.	Technical study to evaluate land acquisition and resettlement.	30 days after the start of the construction phase.
5.2.3	If necessary, based on the technical study of the land acquisition and resettlement processes, develop a program to support the persons affected by projects ("PAP"), which: (i) describes the measures to improve their conditions and livelihood, focused on the vulnerable persons; (ii) defines the risk characteristics to classify any vulnerability condition of the persons affected by projects; and (iii) addresses any potential grievances related to past resettlements through a grievance reception mechanism.	
a.	Support program for People Affected by Projects ("PAP").	30 days after the start of the construction phase.
5.3 Community Engagement		
5.3.1	Develop a Stakeholder Engagement Plan in the RAP and the LRP to consult and inform about the implementation of the land acquisition, compensation and resettlement processes guaranteeing: (i) the involvement of women in consultation activities; (ii) the access of women to the land acquisition processes; and (iii) access to the RAP and the LRP.	
a.	Stakeholders Engagement Plan as part of the RAP and LRP.	Prior to the construction phase.
5.3.2	Implement the Stakeholders Engagement Plan for the Resettlement Action Plan and Life Restoration Plan.	
a.	Evidence of the implementation.	As part of the ESCR.
5.4 Economic Displacement		
5.4.1	Determine the number of Productive Social Units ("PSU") along the Corridor which will be affected by the potential reduction in the road traffic generated by the construction of the bypasses or intersections and characterize them based on: (i) the type of the goods and service offering; (ii) the type of demand (users of passenger transportation, tourists, inhabitants of direct areas of influence and cargo transportation drivers); (iii) potential people affected; (iv) degree of vulnerability (level of literacy and disability); (v) time used in each economic activity; (vi) workforce involved in the activity; and (iv) characteristics of the property (family home, owned or leased).	
a.	PSU Report.	Prior to the beginning of the bypass and intersections construction.
5.4.2	Update technical and economic feasibility studies and validate the compensation measures that would be channeled to the PSUs.	
a.	Technical and economic feasibility studies of the compensation to the PSUs.	Prior to the beginning of the bypass and intersections construction.
5.5 Grievance Mechanism		
5.5.1	Establish a specific grievance mechanism for the RAP guaranteeing the timely resolution of grievances and defining adequate response times for the PAP and the vulnerable PAP.	
a.	Grievance mechanism specific of the Resettlement Action Plan.	Prior to the construction phase.
5.5.2	Implement the grievance mechanism specific of the Resettlement Action Plan.	
a.	Evidence of the implementation.	As part of the ESCR.
PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources		
6.1 Biodiversity Baseline		
6.1.1	Carry out a biotic baseline update study for the Project including the characterization of the natural habitat patches potentially affected by the Project.	
a.	Biotic baseline study.	60 days after the start of the construction phase.
6.2 Biodiversity Action Plan		
6.2.1	Develop a Biodiversity Action Plan ("BAP"), to include: i) a characterization of the areas with significant biodiversity value in the remaining natural habitat; ii) a calculation of biodiversity losses and gains (considering the compensation plan required by Colombian law); iii) a strategy to meet the requirements of "zero net loss" of biodiversity; and iv) a plan to assess and monitor the implementation of this strategy.	
a.	Biodiversity Action Plan ("BAP").	90 days after the start of the construction phase.
6.2.2	Adopt measures to protect the ecosystems and reduce or minimize the footprint caused, that include at least the following: i) the non-use of invasive exotic species when revegetating areas for erosion control or landscaping; and ii) the implementation of wildlife crossings to improve biological connectivity and prevent wildlife a trampling, whose location will be determined based on the results of the biodiversity baseline studies.	
a.	Evidence of the adoption of ecosystem protection measures.	As part of the ESCR.
6.3 Management of Ecosystem Services		
6.3.1	Identify the ecosystem services (provisioning, regulatory, cultural and support) materially affected by the Project.	
a.	Ecosystem services identification study.	180 days after the start of the construction phase.

6.3.2	Implement protection measures for any ecosystem service that may be materially affected by the Project.	
a.	Evidence of implementation.	As part of the ESCR.
PS8: Cultural Heritage		
8.1 Chance Find Procedure		
8.1.1	Develop a Cultural Heritage Management Plan including: (i) an archaeological monitoring program; (ii) chance finds procedures; (iii) an archaeological site protection program; (iv) a chance finds training program with procedures for workers engaged in ground disturbance activities; and (v) guidelines to publish the results of the archaeological rescue excavations, where applicable.	
a.	Cultural Heritage Management Plan.	30 days prior to the start of the construction phase.
8.1.2	Implement the Cultural Heritage Management Plan.	
a.	Evidence of the implementation.	As part of the ESCR.