

Environmental and Social Action Plan (ESAP)					
<b>Project Name:</b>	Troncal del Magdalena II	<b>Project ID:</b>	14523-01	<b>Category:</b>	A
<b>Country:</b>	Colombia	<b>Sector:</b>	TRANSPORT	<b>% of Completion:</b>	0%
<b>Lead Environmental Specialist:</b>	Dousdebés, Carolina	<b>Social Specialist:</b>	Cafruni, Milena		

No.	Deliverable	Compliance date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>		
<b>1.1 Environmental and Social Management System</b>		
1.1.1	Develop an Environmental, Social, and Health and Safety (“ESHS”) Assurance Plan for the Project’s construction phase, which: i) includes all the necessary elements of the Integrated Management System (“IMS”); ii) contains environmental, social, and health and safety verification measures for all activities to be implemented by the Client, its contractors, subcontractors, and main suppliers; iii) defines its objectives, scopes, and responsibilities, iv) describes tools for the implementation of the Plan, such as: (a) labor audits, (b) on-site inspections, (c) verification protocols, (d) equipment certification, (e) operators competency, (f) training needs, (f) key performance indicators (“KPIs”), (g) supervision and monitoring of actions, and (h) reporting requirements (including frequency), among others; v) focus on on-site inspections; and vi) considers third-party support (consultants, experts and, technical advisory services), where appropriate.	
a.	ESHS Assurance Plan of the construction phase	Prior to first disbursement.
1.1.2	Implement the ESHS Assurance Plan for the Project’s construction phase.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
1.1.3	Develop an ESHS Assurance Plan for the Project’s operation and maintenance (“O&M”) phase, with similar characteristics to the one developed for the Project’s construction phase.	
a.	ESHS Assurance Plan of the O&M phase.	30 days prior to the start of the O&M phase.
1.1.4	Implement the ESHS Assurance Plan for the O&M phase.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>1.2 Policy</b>		
1.2.1	Update the Integrated Environmental and Social Management System (“ESMS”), including: i) policies related to the identification and management of social impacts; ii) stakeholder engagement protocols; iii) contextual risk analysis and assessment processes; and iv) specific commitments to non-discrimination, inclusion and gender equality, and non-tolerance for 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 the first disbursement.
1.2.3	Adopt the ESMS.	
a.	Evidence of adoption.	30 days after the first disbursement and thereafter as part of the ESCR.
<b>1.3 Identification of Risks and Impacts</b>		
1.3.1	Update the environmental and social impact matrix for the Project’s construction phase to include the following: i) management measures to prevent, minimize, or compensate for unintended impacts; ii) control measures as required by EIAs, licenses, the Adaptation Plan of the Environmental Guide “PAGA” (as per its acronym in Spanish) , and other environmental and social studies; and iii) performance measures in accordance with the requirements of the IFC’s General Environmental, Health and Safety (“EHS”) Guidelines.	
a.	Environmental and social impacts updated matrix for the Project’s construction phase.	Prior to first disbursement.
1.3.2	Develop an environmental and social impact matrix for the O&M phase of the Project, with similar characteristics to the one developed for the construction phase.	
a.	Environmental and social impact matrix for the Project’s O&M phase.	30 days prior to the start of the O&M phase.

1.3.3	Update the rapid cumulative impact assessment according to IDB Invest's Practical Guide for Cumulative Impact Assessment and Management in Latin America and the Caribbean.	
a.	Updated Cumulative Impact Assessment.	Prior to first disbursement.
1.3.4	Implement the Cumulative Impact Mitigation Plan.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>1.4 Management Programs</b>		
1.4.1	Develop an environmental and social management program for contractors, applicable to the construction phase of the Project, which: i) includes environmental and social objectives; ii) considers KPIs; and iii) follows the guidelines in the International Finance Corporation's ("IFC") Good Practices Note: Managing Contractors' Environmental and Social Performance.	
a.	Environmental and social management program for contractors for the Project's construction phase.	30 days prior to the start of the construction phase.
1.4.2	Implement the Environmental and social management program for contractors - construction phase.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
1.4.3	Develop an environmental and social management program for contractors, applicable to the O&M phase of the Project, with similar characteristics to the one developed for the construction phase.	
a.	Environmental and social management program for contractors for the Project's O&M phase).	30 days prior to the start of the O&M phase.
1.4.4	Implement the Environmental and social management program for contractors for the Project's O&M phase.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>1.5 Organizational Capacity and Competency</b>		
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.
<b>1.6 Emergency Preparedness and Response</b>		
1.6.1	Develop a specific Emergency Preparedness and Response Plan for the construction phase, which: i) considers the most likely risk scenarios (including those that could affect neighboring communities or civil or labor disturbances); ii) includes the types of most relevant potential emergencies (including climate risk and natural disasters); iii) defines the roles and responsibilities (including those of contractors and subcontractors); iv) defines the flow of internal and external communications (with community leaders and government authorities) during emergencies; v) specifies the response equipment to be used and the protocols to be followed during an emergency; and vi) follows the guidelines of (a) the Good International Industry Practices ("GIIPs"), (b) the applicable recommendations of the IFC's Environmental, Health, and Safety ("EHS") General Guidelines and (c) the Environmental, Health, and Safety Guidelines for Toll Roads.	
a.	Emergency Preparedness and Response Plan for the construction phase.	30 days prior to the start of the construction phase.
1.6.2	Implement the Emergency Preparedness and Response Plan for the construction phase.	
a.	Evidence of implementation.	As part of the ESCR.
1.6.3	Develop a specific Emergency Preparedness and Response Plan for the O&M phase, with similar characteristics to the one developed for the construction phase.	
a.	Emergency Preparedness and Response 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 implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>1.7 Monitoring and Review</b>		
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.	Environmental and social legal matrix - construction phase.	30 days prior to the start of the construction phase.
1.7.2	Implement the environmental and social legal matrix for the Project's construction phase.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
1.7.3	Develop an environmental and social legal matrix for the Project's O&M phase, with similar characteristics to the one developed for the construction phase.	

b.	Environmental and social legal matrix - O&M phase.	30 days prior to the start of the O&M phase.
1.7.4	Implement the environmental and social legal matrix for the Project's O&M phase.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>1.8 Stakeholder Analysis and Stakeholder Engagement Planning</b>		
1.8.1	Develop a Stakeholder Engagement Plan ("SEP") for the construction phases of the Project, which: i) includes stakeholder mapping; ii) contains protocols for its periodic updating; and iii) includes strategies, tools, and mechanisms for sharing information and consulting with each mapped stakeholder group in a culturally appropriate manner.	
a.	Stakeholder Engagement Plan ("SEP") for the Project's Construction phase.	Prior to first disbursement.
1.8.2	Implement the Stakeholder Engagement Plan ("SEP").	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
1.8.3	Develop a Stakeholder Engagement Plan ("SEP") for the O&M phase of the Project, with similar characteristics to the one developed for the construction phase.	
b.	Stakeholder Engagement Plan ("SEP") - O&M phase.	30 days prior to the start of the O&M phase.
1.8.4	Implement the Stakeholder Engagement Plan ("SEP") for the O&M phase.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>1.9 Grievance Mechanisms for Affected Communities</b>		
1.9.1	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.
1.9.2	Implement the Customer Service Program.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>1.10 Gender Risks</b>		
1.10.1	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.
1.10.2	Develop a Gender Risk Plan that includes appropriate prevention and management measures for: i) ensure the safety of female employees, taking into account the type of work carried out (isolated work stations, night shifts, and work environment); ii) guarantee access to gender-exclusive 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 communicable diseases and infections.	
a.	Gender Risk Plan	30 days after the start of the construction phase.
1.10.3	Implement the Gender Risk Plan.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>1.11 Climate Change Exposure</b>		
1.11.1	Update the assessment of risks and opportunities to identify adaptation measures to reduce such risks and define other possible mitigation measures, in order to: i) ensure that the Project design incorporates the necessary controls to withstand floods and overflows, thus preserving lives and assets; ii) ensure the existence and dissemination of natural disaster protocols, including at least earthquakes and flooding; and iii) identify the corresponding training needs.	
a.	Climate Change Assessment Study.	Prior to first disbursement and thereafter as part of the ESCR.
1.11.2	Implement the measures of the Climate Change Assessment Study.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>PS 2: Labor and Working Conditions</b>		
<b>2.1 Working Conditions and Terms of Employment</b>		

2.1.1	Develop a Code of Conduct that (a) outlines the set of principles, values, rules, expectations, behaviors, and relationships for its direct employees and those of its contractors and subcontractors, (b) explicitly mentions zero tolerance for discrimination, sexual and psychological harassment, and gender-based violence and harassment (“GBVH”), and (c) is in line with: i) Colombian regulations; ii) Company policies and requirements; iii) IDB Invest’s Sustainability Policy; iv) IDB Invest’s Gender Risk Assessment Tool; and v) any provisions related to the prevention of GBVH, traffic management, and health and safety.	
a.	Code of Conduct.	Prior to first disbursement.
2.1.2	Implement the Code of Conduct.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>2.2 Occupational Health and Safety</b>		
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 the 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 implementation.	As part of the Environmental and Social Compliance Report (ESCR).
2.2.3	Develop an OHS Management Plan for O&M activities with similar characteristics to the one developed for the construction phase.	
b.	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 implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>2.3 Internal Grievance Mechanism</b>		
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 IGM between direct employees and contractors	
a.	Evidence of dissemination.	Prior to first disbursement and then as part of the Environmental and Social Compliance Report (ESCR).
2.3.3	Implement the IGM.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>2.4 Workers Engaged by Third Parties</b>		
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 Standard for 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 Environmental and Social Compliance Report (ESCR).
2.4.3	Implement and monitor the implementation of the Accommodation Conditions Standard.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>2.5 Retrenchment</b>		
2.5.1	Develop a Retrenchment Plan to support workers in the processes of job relocation and reinsertion in the labor market.	
a.	Retrenchment Plan.	30 days after the first disbursement.
2.5.2	Implement the Retrenchment Plan.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).

<b>PS 3: Resource Efficiency and Pollution Prevention</b>		
<b>3.1 Water and Energy Consumption</b>		
3.1.1	Develop a Resource Use Efficiency Plan for the construction phase of the Project, to include: i) a strategy for efficient use; ii) procedures for the identification of uses, demand, and savings opportunities; iii) implementation programs; and iv) a program for monitoring and assessing the proposed reduction measures.	
a.	Resource Use Efficiency Plan for the construction phase.	90 days after the start of the construction phase.
3.1.2	Implement the Resource Use Efficiency Plan for the construction phase.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
3.1.1	Develop a Resource Use Efficiency Plan for the O&M phase of the Project, with similar characteristics to the one developed for the construction phase.	
b.	Resource Use Efficiency Plan for the O&M phase.	30 days prior to the start of the O&M phase.
3.1.2	Implement the Resource Use Efficiency Plan for the O&M phase.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>3.2 Greenhouse Gases</b>		
3.2.1	Develop a GHG emissions inventory for direct emissions (scope 1) and indirect emissions (scope 2) for the construction phase of the Project.	
a.	Annual GHG emissions inventory - construction phase	As part of the Environmental and Social Compliance Report (ESCR).
3.2.1	Develop a GHG emissions inventory for direct emissions (scope 1) and indirect emissions (scope 2) for the O&M phase of the Project.	
b.	Annual GHG emissions inventory - O&M phase.	As part of the Environmental and Social Compliance Report (ESCR).
<b>3.3 Pollution Prevention</b>		
3.3.1	Conduct a technical study to identify, document, and assess any possible environmental liabilities in the Corridor, which have not been addressed by the previous concessionaire (gas stations, material quarries, construction debris, etc.).	
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, Resurfacing, and Painting that will: i) outline the measures and controls to be implemented; ii) comply with Colombian regulations, environmental tools (EIAs, PAGA, etc.); and iii) follow the guidelines contained in the IFC's EHS Guidelines for Toll Roads.	
a.	Environmental Management Plan for Road Paving, Resurfacing, and Painting.	30 days prior to the start of the O&M phase.
3.3.3	Implement the Environmental Management Plan for Road Paving, Resurfacing, and Painting.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>3.4 Pesticide Use and Management</b>		
3.4.1	Verify that road easement maintenance activities requiring the use of pesticides do not use products included in the following categories "Ia" (extremely hazardous) and "Ib" (highly hazardous) of the recommended classification of pesticides of the World Health Organization (WHO).	
a.	Evidence of verification of pesticide use.	As part of the Environmental and Social Compliance Report (ESCR).
<b>PS 4: Community Health, Safety, and Security</b>		
<b>4.1 Community Health and Safety</b>		
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 implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>4.2 Security Personnel</b>		

4.2.1	Conduct a Security Risk Assessment that includes the identification of: i) potential security and violence risks (group or mob violence, violent crime, and retaliation) and other contextual risks; ii) additional risks arising from the security measures implemented, for those both inside and outside of the facilities; and iii) training and equipment needs of security personnel.	
a.	Security Risk Assessment Report.	30 days prior to the start of the construction phase.
4.2.2	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.
4.2.3	Communicate and train relevant stakeholders on the Security Plan.	
a.	Evidence of communication and training.	30 days after signing the loan agreement.
4.2.4	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.
<b>4.3 Hazardous Materials Management and Safety</b>		
4.3.1	Update the OHS Management Programs for handling hazardous materials, to include, among other aspects: i) the need to maintain an updated hazardous materials inventory; ii) procedures for handling hazardous materials; and iii) the specification of storage areas.	
a.	Updated OHS Management Programs	30 days prior to the start of the construction phase.
<b>ND 5: Land Acquisition and Involuntary Resettlement</b>		
<b>5.1 Resettlement and Livelihood Restoration Planning and Implementation</b>		
5.1.1	Develop a Land Acquisition, Compensation, and Resettlement Framework ("LACRF"), which will (a) outline the principles and measures to be implemented for all PAPs, landowners, persons with recognized or recognizable legal rights to the land and assets they occupy, and informal settlers without any legal or recognizable rights to the land impacted by the land acquisition process, and (b) includes: i) resettlement action plans (RAPs); ii) livelihood restoration plans (LRPs) for each Social Unit; iii) a procedure to address the ongoing resettlement and expropriation processes initiated by the previous concessionaire; iv) a procedure to acquire the necessary properties for the Project that are subject to restitution claims (due to the armed conflict); and v) a Stakeholder Engagement Program to consult with PAPs and inform them about the implementation of the LACRF; and vi) conditions that guarantee (c) considerable participation of women in stakeholder consultation and engagement activities, and d) women's access to the land acquisition processes and the resettlement, compensation, and livelihood restoration programs.	
a.	Land Acquisition, Compensation, and Resettlement Framework ("LACRF").	30 days after the start of the construction phase.
5.1.2	Implement the Land Acquisition, Compensation, and Resettlement Framework ("LACRF").	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
5.1.3	Develop a Land Acquisition and Resettlement Monitoring Program, including independent monitoring of the implementation of RAPs and LRPs.	
a.	Land Acquisition and Resettlement Monitoring Program.	Prior to first disbursement.
5.1.4	Implement the Land Acquisition and Resettlement Monitoring Program.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
5.1.5	Conduct a final independent audit to assess the success of the RAPs which: i) assesses whether the livelihoods and living conditions of PAPs who were physically or economically displaced have been improved or at least restored; and ii) if necessary, propose corrective actions to meet the unmet objectives.	
a.	External audit of the RAPs.	Once a year, 3 to 5 years after completion of LACRF implementation.
5.1.6	Prepare a report that: (i) characterizes the socioeconomic and land ownership conditions of the people affected by the interruption of land acquisition and resettlement initiated by the previous concessionaire; (ii) assesses the impacts of delays in compensation payments on their livelihoods; (iii) identifies and characterizes all affected Social Units ("SUs") whose land acquisition process was initiated but not completed by the previous concessionaire; iv) describes the current living conditions and livelihoods of PAPs and compares them to their situation prior to the initiation of the land acquisition process; and v) provides information on the impacts that the delay in compensation payments has generated, in terms of current value of compensation paid and outstanding, and income and benefits derived from the continued use of the land and resources.	
a.	Characterization report of the SUs whose land acquisition process was interrupted.	30 days after the start of the construction phase.

<b>5.2 Compensation and Benefits for Displaced Persons</b>		
5.2.1	Develop a technical study to review the land acquisition and resettlement processes carried out by the previous concessionaire as required by Colombian law and the IDB Invest's Sustainability Policy.	
a.	Technical study to review the land acquisition and resettlement processes.	30 days after the start of the construction phase.
5.2.2	If necessary, based on the technical study of land acquisition and resettlement processes, develop a program to support Project Affected Persons ("PAPs") that: i) describes measures to improve their conditions and livelihoods, with a focus on vulnerable people; ii) defines risk categories to classify any vulnerability conditions of PAPs; and iii) addresses possible complaints related to past resettlements, through a mechanism for receiving complaints.	
a.	Project Affected Persons ("PAPs") Program.	30 days after the start of the construction phase.
5.2.3	Implement the Project Affected Persons ("PAPs") Program, when applicable.	
a.	Evidence of PAP implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>5.3 Community Engagement</b>		
5.3.1	Develop a Stakeholder Engagement Plan in the RAP and LRP to consult with and inform the community about the implementation of land acquisition, compensation, and resettlement processes, to ensure: i) the participation of women in the consultation activities; ii) women's access to the land acquisition processes; and iii) access to the RAPs and LRPs.	
a.	Stakeholder Engagement Plan in the RAP and LRP.	Prior to the start of the construction phase.
5.3.2	Implement the Stakeholder Engagement Plan in the RAP and LRP.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>5.4 Economic Displacement</b>		
5.4.1	Update the technical and economic feasibility studies to validate the location and characteristics of the Community Commercial Areas ("CCAs").	
a.	Technical and economic feasibility studies of the CCAs.	Prior to the start of construction of the bypasses.
<b>5.5 Grievance Mechanism</b>		
5.5.1	Establish a specific grievance mechanism for the RAP that guarantees timely attention and defines adequate response times to attend to PAPs and vulnerable PAPs.	
a.	Specific complaints mechanism for the RAPs.	Prior to the start of the construction phase.
5.5.2	Implement the specific grievance mechanism for the RAP.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>ND 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>		
<b>6.1 Biodiversity Baseline</b>		
6.1.1	Conduct a study to update the biotic baseline of the Project that includes the characterization of the natural habitat ("NH") patches potentially affected by the Corridor route.	
a.	Biotic baseline study.	60 days after the start of the construction phase.
<b>6.2 Biodiversity Action Plan</b>		
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 Environmental and Social Compliance Report (ESCR).
<b>6.3 Management of Ecosystem Services</b>		
6.3.1	Identify the ecosystem services (provisioning, regulating, cultural, and supporting) materially affected by the Project.	
a.	Ecosystem services identification study.	180 days after the start of the construction phase.
6.3.2	Implement the protection measures for any ecosystem services that may be materially affected by the Project.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).

PS 8: Cultural Heritage		
8.1 Chance Find Procedures		
8.1.1	Develop a Cultural Heritage Management Plan that includes: i) an archaeological monitoring program; ii) chance finds procedures; iii) an archaeological site protection program; iv) a training program on the identification of chance finds, along with chance find procedures for workers engaged in ground disturbing activities; and v) guidelines for the publication of the results of 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 implementation.	As part of the Environmental and Social Compliance Report (ESCR).