

Atlas Solar PV Project (GIP) - Colombia
Environmental and Social Action Plan – ESAP

No.	Product/Deliverable	Completion Date
PS1: Assessment and Management of Environmental and Social Risks and Impacts		
1.1 Policy		
1.1.1	Communicate and disclose the Project's sustainability policy across all organization levels, including contractors, suppliers and other internal and external stakeholders.	
a.	Evidence of disclosure.	Before the first disbursement and later as part of the Environmental and Social Compliance Report ("ESCR")
1.2 Cumulative impact analysis		
1.2.1	Update the Cumulative Impact Assessment for the Project to include a cumulative impact mitigation plan ("CIMP"), as per IDB Invest's Practical Guide for Cumulative Impact Assessment in Latin America and the Caribbean.	
a.	Updated cumulative impact assessment.	Prior to the first disbursement
1.2.2	Implement the Cumulative Impacts Mitigation Plan.	
b.	Evidence of the implementation	As part of the ESCR
1.3 Gender risks		
1.3.1	Develop a gender risk plan to include, among other aspects: (i) prevention and management measures to ensure female employees' safety, considering isolated work posts, night shifts, work environment, transport and access to gender-exclusive toilets; (ii) actions to minimize gender-based violence ("GBV") and social conflict risk; (iii) measures to prevent the risk of sexual exploitation of boys, girls, teenagers and other vulnerable groups; and (iv) actions to prevent the spread of diseases and communicable infections.	
a.	Gender Risk Plan.	30 days prior to the start of the construction phase.
1.3.2	Implement the Gender Risk Plan.	
b.	Evidence of the implementation.	As part of the ESCR.
1.4 Management programs		
1.4.1	Adapt the program "Somos parte de la misma energía" for the Project, considering, among other personnel selection parameters: (i) the female unemployment rates in Ibagué; and (ii) gender-specific vulnerability conditions.	
a.	Program "Somos parte de la misma energía" after being adapted to the Project's needs.	Prior to the first disbursement.
1.5 Organizational capacity and competency		
1.5.1	Train Project direct and indirect staff (contractors and subcontractors) periodically in E&S aspects.	
a.	Evidence of training provided.	30 days prior to start the construction phase and later as part of the ESCR.
1.5.2	Make sure Contractors hire environmental and social ("E&S") experts to implement their management programs.	
b.	Updated Project organizational chart for the Construction phase, with the names and roles of the experts to be appointed.	30 days prior to start the construction phase and later as part of the ESCR.
1.6 Monitoring and evaluation		
1.6.1	Develop an E&S legal matrix for the Project's construction phase: (i) all the national E&S and OHS regulatory requirements; (ii) the contractual financing obligations and requirements; and (iii) provisions for the timely review and monitoring of such obligations and requirements.	
a.	E&S impact matrix as updated for the Project Construction phase.	Prior to the first disbursement.
1.6.2	Implement the E&S legal matrix for the Project Construction phase.	
b.	Evidence of implementation	As part of the ESCR.
1.6.3	Prepare an E&S legal matrix for the Project Operation phase to include: (i) all the national E&S OHS regulatory requirements; (ii) the contractual obligations and requirements derived from the financing facility; and (iii) the timely monitoring and review of those obligations and requirements.	

c.	E&S impact matrix for the Project operation phase.	30 days prior to start the operation phase
1.6.4	Implement the E&S legal matrix for the Project operation phase.	
d.	Evidence of implementation.	As part of the ESCR.
1.7 Disclosure of information		
1.7.1	Update the information disclosure procedures for the Project construction phase to include: (i) tools to document it; and (ii) details about the social investment programs, such as education, environment, sports promotion and capacity building, and the mitigation plans for derived impacts, if applicable.	
a.	Information disclosure procedures as updated for the Project Construction phase.	Prior to the first disbursement.
1.7.2	Adopt the information disclosure procedures for the Project construction phase.	
b.	Evidence of disclosure of information during the Project construction phase.	30 days prior to start the construction phase and later as part of the ESCR
1.7.3	Update the information disclosure procedures for the Project operation phase to include: (i) tools to document it; and (ii) details about the social investment programs, such as education, environment, sports promotion and capacity building, and the mitigation plans for derived impacts, if applicable.	
c.	Information disclosure procedures for the Project Operation phase.	30 days prior to start the operation phase
1.7.4	Adopt the information disclosure procedures for the Project operation phase.	
d.	Evidence of disclosure of information during the Project operation phase.	As part of the ESCR.
1.8 Informed consultation and participation		
1.8.1	Update the stakeholder map for the Project construction phase based on the updated risk and impact assessment.	
a.	Stakeholder map as updated for Construction phase.	Prior to the first disbursement.
1.8.2	Update the stakeholder map for the Project operation phase based on the updated risk and impact assessment.	
b.	Stakeholder map as updated for the operation phase.	30 days prior to the start of the operation phase.
1.9 Community grievance mechanism		
1.9.1	Update the external grievances mechanism procedure to guarantee: (i) culturally adequate access for affected communities and other stakeholder groups; (ii) all communications are recorded, analyzed, assessed and responded timely; (iii) anonymity and priority for vulnerable groups; and (iv) GBV grievances are properly treated.	
a.	External grievances mechanism procedure for the Project.	Prior to the first disbursement.
1.9.2	Submit a record of the external grievances received and processed by the Project.	
b.	Record of the external grievances for the Project.	As part of the ESCR.
PS2: Labor and Working Conditions		
2.1 Internal grievance mechanism		
2.1.1	Update the internal grievance mechanism, to guarantee: (i) all grievances that may be typified as of inappropriate conduct are recorded; (ii) there are safe channels to capture confidential or anonymous grievances; (iii) the grievances related to gender-based violence, and sexual or workplace harassment are properly handled with a victim-centered approach; (iv) those filing grievances will not suffer any retaliation measures; (v) the mechanism is disclosed; (vi) a grievance record and monitoring system is adopted; and (vii) KPIs are used for monitoring and reporting activities.	
a.	Updated internal grievance mechanism.	30 days prior to the start of the construction phase.
2.1.2	Present a record of the internal grievances received and processed by the Project.	
b.	Record of internal grievances.	As part of the ESCR.
2.2 Human resources policies and procedures		
2.2.1	Develop a human resources policy for the Project, applicable to the construction and operation phases.	
a.	Human resources policy for the Project.	Prior to the first disbursement.
2.2.2	Disclose the human resources policy for the Project.	
b.	Evidence of disclosure.	As part of the ESCR.
2.2.3	Prepare a human resources procedure for the Project Construction phase.	

c.	Human resources procedure for the construction phase.	Prior to the first disbursement.
2.2.4	Prepare a human resources procedure for the Project Operation phase.	
d.	Human resources procedure for the operation phase.	30 days prior to the start of the operation phase.
2.3 Retrenchment		
2.3.1	Prepare a retrenchment plan to support workers during work relocation and labor market reintegration.	
a.	Retrenchment Plan.	90 days after signing the loan agreement.
2.4 Occupational health and safety		
2.4.1	Prepare an occupational health and safety (“OHS”) management plan for the Project construction phase to include: (i) guidelines to carry out field inspections at work fronts in order to assess the OHS conditions and properly identify opportunities for improvement; (ii) procedures to identify any unmitigated risks; (iii) requirements to protect workers from physical and road safety risks; and (iv) ways to improve the following processes: (a) safety risk identification and communication, (b) competence assessment and certification for equipment operators, (c) equipment safety inspections, (d) emergency protocols and communications, and (e) field health and safety monitoring.	
a.	OHS management plan for the Project construction phase.	30 days prior to start the construction phase.
2.4.2	Implement the OHS management plan for the Project construction phase.	
b.	Evidence of the implementation.	As part of the ESCR.
PS3: Resource Efficiency and Pollution Prevention		
3.1 Greenhouse gases		
3.1.1	Prepare an annual inventory of greenhouse gases (“GHG”) emissions to include: (i) significant sources of direct emissions (scope 1); (ii) indirect emissions from the energy consumed (scope 2); and (iii) the implementation of strategies to reduce scope 1 and 2 emissions.	
a.	Annual inventory of GHG emissions for the construction phase.	As part of the ESCR.
3.1.2	Estimate the total GHG scope 1 and 2 emissions for the Project construction phase.	
b.	Report on the estimated total GHG emissions for the construction phase	Prior to the first disbursement.
3.1.3	Develop an offset and material disposal plan to compensate for the GHG emissions caused by forest clearing and use.	
c.	Forest offset and forest material disposal plan.	Prior to the first disbursement.
3.1.4	Implement the forest offset and forest material disposal plan.	
d.	Evidence of the implementation.	As part of the ESCR.
3.2 Water consumption		
3.2.1	Prepare and use factsheets to manage third parties water supply, to include: (i) objectives; (ii) goals; (iii) impacts; (iv) management measures; and (v) management performance indicators.	
a.	Water supply management factsheets.	30 days prior to the start of the Construction phase.
3.2.2	Start using water supply management factsheets.	
b.	Evidence of the implementation.	As part of the ESCR.
3.2.3	Develop and implement a water management plan to guarantee: (i) is used rationally and efficiently; (ii) quality is kept without negatively affecting the people (health and wellbeing) or the use of the land on site; (iii) the compliances of applicable standards and legal requirements; (iv) potential impacts on the quality of the water caused by the works are mitigated; and (v) the ecosystems near the Project area are protected.	
c.	Water Management Plan.	30 days prior to the start of the Construction phase.
3.2.4	Implement the water management plan.	
d.	Evidence of the implementation.	As part of the ESCR.
3.3 Pollution prevention		
3.3.1	Prepare and implement an environmental noise mitigation plan for the construction phase to include the following measures, among others: (i) keeping equipment horns and sirens under control; (ii) checking work equipment and machinery for silencers; and (iii) limiting or banning the use of noise-generating equipment, especially during nighttime activities.	

a.	Noise mitigation plan.	30 days prior to the start of the construction phase.
3.3.2	Implement the noise mitigation plan.	
b.	Evidence of the implementation.	As part of the ESCR.
3.4 Hazardous materials management		
3.4.1	Prepare an inventory of chemical substances or products for the Project construction phase to include: (i) a product list and characteristics; (ii) an analysis of less hazardous replacements; and (ii) the prohibition to use materials that are internationally banned.	
a.	Inventory of chemical substances or products for the Project construction phase.	As part of the ESCR.
3.4.2	Prepare an inventory of chemical substances or products for the Project operation phase to include: (i) a product list and characteristics; (ii) an analysis of less hazardous replacements; and (iii) the prohibition to use materials that are internationally banned.	
b.	Inventory of chemical substances or products for the Project operation phase.	As part of the ESCR.
PS4: Community Health and Safety		
4.1 Infrastructure and equipment design and safety		
4.1.1	Develop a road signage program to guarantee the safety of workers and surrounding communities for the Project construction phase.	
a.	Road signage program.	30 days prior to the start of the construction phase.
4.1.2	Implement the road signage program.	
b.	Evidence of implementation.	As part of the ESCR.
4.1.3	Develop a dust control program to wet roads and work fronts for the Project construction phase.	
c.	Dust control program.	30 days prior to the start of the construction phase.
4.1.4	Implement the dust control program.	
d.	Evidence of implementation.	As part of the ESCR.
4.1.5	Monitor noise levels periodically at sensitive receptors to guarantee proper levels during the Project construction phase.	
e.	Reports on periodic noise levels monitoring actions at sensitive receptors.	As part of the ESCR.
4.1.6	Prepare, for the Project construction phase, a traffic management plan with potential alternative access roads to the Project to avoid road deterioration caused by trucks and heavy machinery running back and forth the solar power plant.	
f.	Road traffic management plan.	30 days prior to the start of the construction phase.
4.1.7	Implement the road traffic management plan.	
g.	Evidence of implementation.	As part of the ESCR.
4.2 Community exposure to disease		
4.2.1	Update and implement a community health, safety and security management procedure to include, among other things, measures to: (i) safely transport and manage waste and hazardous materials, (ii) manage the impacts of increasing traffic of light and heavy vehicles coming in and out of the Project, (iii) minimize the risk of social conflict and gender-based violence; (iv) prevent the risk of sexual exploitation of boys, girls, teenagers and other vulnerable groups due to the presence of Project workers; and (v) prevent the spread of communicable diseases (sexually transmitted or vector-borne) due to the presence of Project workers.	
a.	Community health, safety and security management procedure as updated for the construction phase.	30 days prior to the start of the construction phase.
4.2.2	Implement the community health, safety and security management procedure.	
b.	Evidence of the implementation.	As part of the ESCR.
4.3 Security personnel		
4.3.1	Develop a security plan to manage the private security forces which: (i) includes measures to avoid potential damages to employees, communities and other stakeholders; (ii) is aligned with the Good Practice Handbook: "Use of Security Forces: Assessing and Managing Risks and Impacts, Guidance for the Private Sector in Emerging Markets" issued by the International Finance Corporation ("IFC"); (iii) is applicable to all contractors and subcontractors; (iv) includes formal procedures to report on, respond to and document security incidents; (v) contains training requirements which include the use of force and the prevention and management of GBVH acts; (vi) includes procedures to review the security contractors records; and (vii) includes procedures to analyze the applicants for security guards.	
a.	Private security forces security plan.	30 days prior to the start of the Construction phase

4.3.2	Implement the security plan to handle the private security forces.	
b.	Evidence of the implementation.	As part of the ESCR.
PS5: Land Acquisition and Involuntary Resettlement		
5.1 Economic displacement		
5.1.1	Update the corporate land acquisition procedure to guarantee: (i) fast-track compensation for those who are economically displaced due to asset loss or land use limitation, for an amount that makes it possible for them to recover what they have lost (fixed assets at total replacement cost in cash or in kind); (ii) restoration of their economic activity; (iii) economic support for them to face the transition towards generating revenue again or recovering their production levels; and (iv) special measures for vulnerable populations (if applicable).	
a.	Land acquisition procedure as updated for the Project.	Prior to the first disbursement.
5.1.2	Implement the Project land acquisition procedure (when applicable).	
b.	Evidence of the implementation.	As part of the ESCR, when applicable.
PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources		
6.1 Biodiversity baseline		
6.1.1	Update the Project biotic baseline.	
a.	Updated biotic baseline.	Prior to the first disbursement.
6.1.2	Update the applicable programs and factsheets in the EMP, based on the updated Project biotic baseline.	
b.	Updated EMP programs and factsheets.	30 days after first disbursement.
6.2 Modified habitats		
6.2.1	Update the compensation and action plan for the rehabilitation of non-vascular species ("VEDA", per its acronym in Spanish) to include: (i) an estimation of losses and gains in the affected forest areas considering the compensation plan demanded under Colombian legislation; (ii) a strategy to fulfill all the reforestation requirements; and (iii) a plan to assess and monitor the implementation of such strategy.	
a.	Updated compensation and action plan for the rehabilitation of non-vascular species ("VEDA").	30 days after first disbursement.
6.2.2	Implement the updated compensation and action plan for the rehabilitation of non-vascular species ("VEDA").	
b.	Evidence of implementation.	As part of the ESCR.
6.3 Management of ecosystem services		
6.3.1	Update the identification of the ecosystem services (provisioning, regulating, cultural and support) that may be significantly affected by the activities performed by the Project and its supply chain.	
a.	Updated assessment of ecosystem services.	30 days after first disbursement.
6.3.2	Implement the necessary measures to mitigate the impacts of the Project's suppliers on the ecosystem services.	
b.	Evidence of implementation.	As part of the ESCR.