

Colombia – FDN Puerto de Antioquia – Environment and Social Action Plan (ESAP) – December 2019*

**This ESAP is based on the ESAP disclosed by IDB Invest in August 2019, and therefore, it presents some items that have already been completed.*

No.	Action	Deliverable	Deadline
PS 1: Assessment and Management of E&S Risks and Impacts			
1	Provide training on the Lenders policies (focused on the IFC Performance Standards) to all Project management.	Copies of training material and attendance records demonstrating participation by all Project managers.	Completed October 2019
2	Actively disseminate the Project’s E&S policy to all Project employees.	Evidence of policy dissemination (e.g., signed induction records).	First disbursement
3	Update the Project-level Risk and Impact Assessment, ensuring that it identifies, and addresses issues related to any vulnerable individuals and groups (as defined by Performance Standard 1) that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status.	Updated Risk and Impact Assessment.	March 31, 2020 ¹
4	Develop an ESMS for the Project, consistent with PS 1, integrating all E&S policies, management plans and monitoring plans. The management plans should address every risk identified in the Project-level Risk and Impact Assessment. Where appropriate, plans should include consideration of the construction as well as the operation phase and differentiated measures for any disadvantaged or vulnerable individuals or groups identified in the Risk and Impact Assessment (e.g., women, or ethnic minority groups with collective rights), so that adverse impacts do not fall disproportionately on them and they are not disadvantaged in sharing development benefits and opportunities.	Documented E&S Management System.	March 31, 2020
5	Define and document the organizational structure for the Project’s E&S management, showing that the Project has sufficient human resources to implement the Project’s ESMS.	Project organizational chart including E&S positions and their descriptions, included in the ESMS.	March 31, 2020
6	Include in the EPC contract requirements for COTEMA to undertake the following: (i) Develop and implement an ESMS aligned with the Project’s ESMS and consistent with IFC Performance Standard 1; (ii) Ensure that each of COTEMA’s subcontractors implements an ESMS consistent with PS 1.	Copy of executed EPC Contract.	March 31, 2020
7	Update the Stakeholder Engagement Plan to be consistent with PS 1.	Stakeholder Engagement Plan.	March 31, 2020

¹ Note: MIGA has used, ‘March 31, 2020’ as an estimated date of financial close, which is the deadline in the IDB Invest ESAP.

No.	Action	Deliverable	Deadline
8	Develop an Emergency Preparedness and Response Plan consistent with PS 1.	Emergency Preparedness and Response Plan.	March 31, 2020
9	Ensure that the contractors in charge of the design, building and operation of the bulk solids facility and any off-port storage facility for empty containers that may be needed for port operations, comply with the MIGA's E&S requirements.	Executed legal agreements containing appropriate contractual clauses.	Prior to signing any legal agreements with relevant owners, operators or contractors
10	<p>Regarding the existing road from Rio Grande to Nueva Colonia:</p> <ol style="list-style-type: none"> 1. Conduct E&S (including socioeconomic) baseline studies in consultation with the affected population. 2. Conduct an E&S risk assessment in consultation with the affected population; 3. Develop an E&S Impact Assessment (ESIA) and accompanying management plans for any roadworks to be performed by the EPC contractor or third parties along the route, incorporating the abovementioned baseline and risk assessment; 4. Incorporate E&S supervision of these roadworks into the Project's ESMS; and 5. Ensure that roadworks contractors are legally obliged to implement the management plans. 	<ol style="list-style-type: none"> 1. E&S baseline studies. 2. E&S risk assessment. 3. ESIA and related management plans aligned with the IFC Performance Standards. 4. Copies of legal agreement(s) requiring roadworks contractors to implement the management plans developed by the Project. 5. Documentation demonstrating that supervision plans have been incorporated into the Project's ESMS. 	<ol style="list-style-type: none"> 1. March 31, 2020 2. March 31, 2020 3. Prior to any roadworks on this road being contracted 4. Prior to any roadworks on this road being contracted 5. Prior to any roadworks on this road being contracted
11	<p>Regarding the proposed new alternative access road:</p> <ol style="list-style-type: none"> 1. Develop an ESIA and accompanying management plans for the road's construction; 2. Ensure that roadworks contractors are legally obliged to implement the abovementioned management plans; and 	<ol style="list-style-type: none"> 1. ESIA and related management plans aligned with the IFC Performance Standards. 2. Copies of legal agreements demonstrating that relevant contractors are required to implement these management plans. 	<ol style="list-style-type: none"> 1. Second Disbursement 2. Prior to any contracts being signed for these roadworks Second Disbursement

No.	Action	Deliverable	Deadline
	3. Incorporate E&S supervision of these roadworks into the Project's ESMS.	3. Documentation demonstrating that supervision plans have been incorporated into the Project's ESMS.	3. Prior to any contracts being signed for these roadworks
12	Regarding the Nueva Colonia Electrical Substation and the transmission line from the port to the Substation: 1. Evaluate the ESIA and accompanying construction and operation management plans for consistency with the IDB Invest E&S Sustainability Policy, and 2. Incorporate E&S supervision of these works into the Project's ESMS.	1. Written evaluation of the consistency of the ESIA and related management plans with the IDB Invest E&S Sustainability Policy. 2. Documentation demonstrating that these works are incorporated in the Project's ESMS.	The sooner of First Disbursement or commencement of construction activities on these facilities.
13	Conduct A Natural Hazard Risk Assessment, compliant with IDB's Disaster Risk Management Policy.	Natural Hazard Risk Assessment, including details of how the Project plans to prevent or mitigate any high natural hazard risks.	March 31, 2020
14	Incorporate all existing Project-related analyses of alternatives into a single document and include a "without-project" scenario.	Consolidated Analysis of Alternatives.	March 31, 2020
15	Document a strategy for handling any modifications of licenses or permits that the Project may require in the future. Include in the strategy a table for continually tracking the status of all Project-required permits and licenses.	1. Strategy for ensuring continued compliance with laws and regulations regarding environmental permits and licenses for the Project and all Associated Facilities (as determined by the Lenders). 2. A list of all necessary permits and licenses, categorized by due date (i.e., either Financial Close or First Disbursement).	March 31, 2020
<i>PS 2: Labor and Working Conditions</i>			
16	Develop a Local Hiring Management Plan.	Local Hiring Management Plan.	March 31, 2020
17	Update the Worker Accommodation Plan to be consistent with PS 2.	Worker Accommodation Plan.	March 31, 2020
18	Oblige principal contractors to implement the Worker Accommodation Plan.	Executed contracts with [principal contractors] including requirement to implement the Worker Accommodation Plan.	First Disbursement
19	Mark for visibility the wreck located 2.5 kilometers west-northwest of the Leon River entrance.	Evidence that the wreck has been marked.	First Disbursement

No.	Action	Deliverable	Deadline
PS 3: Resource Efficiency and Pollution Prevention			
20	Update the Solid Waste Management Plan to be consistent with PS 3.	Solid Waste Management Plan.	March 31, 2020
21	Update the Air Quality and Airborne Noise Monitoring Plan to be consistent with PS 3.	Air Quality, Airborne Noise, and Vibration Management and Monitoring Plan.	March 31, 2020
22	Update the Management Plan for Fuels, Oils and Lubricants on Land, Docks and Boats to be consistent with IFC PS 3.	Management Plan for Fuels, Oils and Lubricants on Land, Docks and Boats.	March 31, 2020
23	Quantify greenhouse gas emissions, following the guidance in the International Maritime Organization's <i>Port Emissions Toolkit--Guide No.01: Assessment of Port Emissions</i> .	Report on methods and results of greenhouse gas quantification.	First Disbursement
PS 4: Community Health, Safety and Security			
24	Develop a Traffic Management Plan, with participation from roadside residents and business owners.	Traffic Management Plan. 1.	First Disbursement
25	Ensure relevant authorities (e.g., from the Municipality of Turbo) agree to participate in implementation of Traffic Management Plan.	Evidence of agreement by relevant authorities.	First Disbursement
26	Ensure the principal contractors (e.g., EPC contractor and dredging contractor) comply with Traffic Management Plan.	Executed legal agreements containing appropriate contractual clauses.	Prior to signing contracts with relevant principal contractor
27	Update the Community Grievance Mechanism to ensure it is fully accessible to those with communication obstacles such as illiteracy and physical accessibility issues and that it is fully consistent with PS4.	Community Grievance Mechanism, as part of Stakeholder Engagement Plan.	March 31, 2020
28	Develop a Community Health and Safety Management Plan to be consistent with PS 4.	Community Health and Safety Management Plan.	March 31, 2020
29	Develop a Security Forces Management Plan aligned with the following standards: 1. The IFC Good Practice Handbook—Use of Security Forces: Assessing and Managing Risks and Impacts; and 2. The Voluntary Principles on Security and Human Rights.	Security Forces Management Plan as part of the Security and Protection of Human Rights Plan.	March 31, 2020
30	Develop a Worker Influx Management Plan.	Worker Influx Management Plan.	March 31, 2020
PS 5: Land Acquisition and Involuntary Resettlement			
31	Update the Land Acquisition and Involuntary Resettlement Policy to be consistent with PS 5.	Updated Land Acquisition and Involuntary Resettlement Policy.	March 31, 2020
32	Ensure all families relocated from El Canal have legal title to their lands.	Evidence that all families have legal land titles to their properties.	Technical Completion

No.	Action	Deliverable	Deadline
33	Build and deliver the boat docking infrastructure that El Canal fisherfolk requested as part of the resettlement process.	Documentary evidence, signed by beneficiaries, of transfer of the infrastructure.	Technical Completion
34	Complete the resettlement process for any remaining families in El Canal in accordance with PS 5.	Evidence of finalization of resettlement process.	First Disbursement
35	Develop a Compensation Plan for compensating any economic impacts to fisherfolk or landowners along access routes that cannot be fully avoided or mitigated.	Compensation Plan.	First Disbursement
<i>PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</i>			
36	Update the Dredging Monitoring and Management Plan to be consistent with PS 6.	Dredging Monitoring and Management Plan.	First Disbursement
37	Oblige the dredging contractor to implement the Dredging Monitoring and Management Plan.	Executed contract between Project and dredging contractor including requirement to implement the Project's Dredging Monitoring Plan.	Prior to signing contract with dredging contractor
38	Conduct and document a Critical Habitat Assessment in collaboration with qualified marine mammal specialists.	Critical Habitat Assessment.	Completed December 2019
39	Conduct a Biodiversity Impact Assessment aligned with PS 6.	Biodiversity Impact Assessment.	Completed December 2019
40	Develop a Biodiversity Action Plan.	Biodiversity Action Plan.	First Disbursement
41	Update the Biodiversity Monitoring Plan to be consistent with PS 6.	Biodiversity Monitoring Plan.	First Disbursement
42	Update the Participatory Artisanal Fishing Monitoring Plan to be consistent with PS 6.	Participatory Artisanal Fishing Monitoring Plan.	March 31, 2020
<i>PS 7: Indigenous Peoples</i>			
43	Demonstrate that the Project still maintains the Free, Prior and Informed Consent (FPIC) of both COMANUCO and Puerto Girón once the Project's Risk and Impact Assessment and ESMS have been completed and the Project has informed the communities of their contents in a culturally appropriate and fully accessible manner.	Certifications from the Project's E&S Monitoring Consultant confirming that the Project has the Free, Prior and Informed Consent of each community.	March 31, 2020
44	Develop an Indigenous People's Development Plan. The Plan should be linked to any Project benefit sharing or CSR plan for the broader community. It must address specific cultural, collective territory or group needs of COMANUCO and Puerto Girón.	Indigenous People's Development Plan including evidence of community participation in its development.	March 31, 2020