

Environmental and Social Review Summary (ESRS)

Puerto Antioquia, municipality of Turbo, Gulf of Urabá – Colombia

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1. General Information and Overview of Scope of IDB Invest's Review

The project consists of the design, construction, operation and maintenance of a greenfield multipurpose port facility located in the southern end of the Gulf of Urabá, known as Puerto Bahía, Antioquia region, municipality of Turbo, Colombia, under a 30-year concession contract (the "Project"). The Project will build up on existing and captive traffic (major shipping lines already call at Urabá despite the lack of modern port facilities), becoming the main outlet for Urabá's banana and fruit exports, which represent 75% of Colombian banana exports. Due to its location and logistic cost advantages, it is also expected that Puerto Antioquia will divert cargo in and out of Medellín (the second largest city in Colombia and main international trade region in Colombia), and in and out of Bogotá and surrounding areas.

Project components include; (i) an offshore deck with 1,337 meters of berth (570 for container, 537 for bulk & general cargo, 230 for Roll-On-Roll-Off cargo) capable of handling super post-Panamax vessels; (ii) a 3.8 kilometer viaduct and access road that connects the offshore deck with the inland terminal; (iii) a 38 hectare inland terminal/logistic facility, including a container yard, dry-bulk storage facilities, warehouses, inspection areas, maintenance and administration buildings and utilities; and (iv) a 115kV electrical transmission line, approximately 4.9 kilometers long, connecting the port to the substation of Nueva Colonia. The Project's initial handling capacity is of 600,000 TEU (expandable to 800,000 TEU), 1.15 million tons of general cargo/year, 3 million tons of bulk cargo, and 60,000 vehicles. The Project currently has land access routes, but prior to start of operations there will be a 13-kilometer alternate road built in order to allow for the progressive expansion of port operations.

The IDB Group's Environmental and Social (E&S) review of the Project began with a gap analysis conducted in April 2016. The purpose of the gap analysis was to assess, at an early stage, the Project's alignment with the IDB Group's E&S policies and the IFC Performance Standards. This gap analysis was performed with the assistance of a specialist international consulting firm and included a desk review of pertinent information (e.g., Environmental Impact Assessments and management plans, permits, and licenses), as well as an initial site visit. In 2018, a second desk review and site visit were performed by the same consulting firm. Subsequently, in 2019 the E&S firm conducted its final due diligence visit, followed closely by a visit by the IDB Invest Project Team. All site visits included meetings with representatives from local communities and community groups.

2. Environmental and Social Categorization and Rationale

The Project has been classified as a Category A (High-Risk) operation according to IDB Invest's Environmental and Social Sustainability Policy. The classification is due primarily to the Project's

potential impacts on indigenous peoples (two afro-descendant communities are located in the Project's area of influence), as well as the Project's potential impacts on critical habitats (the marine and terrestrial environments in the Project area are inhabited by several endangered and critically endangered species).

The Performance Standards (PS) triggered by the Project are:

PS1: Assessment and Management of Environmental and Social Risks and Impacts

PS2: Labor and Working Conditions

PS3: Resource Efficiency and Pollution Prevention

PS4: Community Health, Safety, and Security

PS5: Land Acquisition and Involuntary Resettlement

PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

PS7: Indigenous Peoples

PS8: Cultural Heritage

3. Environmental and Social Context

The Project will be located in the southern part of the Gulf of Urabá, adjacent to the mouth of the Río León and close to the town of Nueva Colonia (municipality of Turbo), Colombia. The Gulf of Urabá is considered an ecosystem of great environmental value, constituting one of the most important estuaries of the Colombian Caribbean. The Project was granted a 30-year right over an offshore area of 130 hectares, located in an exclusion zone where activities not related to shipping are already prohibited. The terrestrial components of the Project will be built on 35 hectares of land previously used for farming. These lands are heavily disturbed and in varying stages of regeneration, with the exception of some small remaining fragments of primary vegetation.

The main access to the project during construction will be the existing road that connects the Project to the Turbo-Apartadó highway. This road passes through agricultural lands except for one stretch that crosses through a heavily populated part of Nueva Colonia for approximately one kilometer, and another stretch that borders the community of Rio Grande for approximately 750 meters where the road intersects with the main highway. Once the Project enters operation, port-related traffic will be diverted around Nueva Colonia on a bypass road to be built prior to that time. The bypass will pass entirely through agricultural lands (banana plantations).

The Project's transmission line, connecting the port to an existing substation in Nueva Colonia which will be extended, will be approximately 4.9 kilometers long and will pass through a patchwork of previously disturbed habitats.

Two Afro-descendant ethnic minority groups are present in the Project's area of influence: the *Consejo Comunitario de Puerto Girón* ("Puerto Girón") on the right bank of the Río León and, the *Consejo Comunitario Mayor de Comunidades Negras de Nueva Colonia* ("COMANUCO"), within the town of Nueva Colonia.

4. Environmental Risks and Impacts and Proposed Mitigation and Compensation Measures

4.1 Assessment and Management of Environmental and Social Risks

4.1.a E&S Assessment and Management System

The Project has not yet developed a full-fledged, consolidated Environmental and Social Management System (“ESMS”). It has, however, already developed many of the components that will eventually comprise such a system.

4.1.b Policy

The Project has prepared an E&S Policy reflecting its commitment to sustainable development and to the management of the Project’s E&S risks and impacts. The Project has also developed the following policy documents, which are integrated into the broader E&S policy: a Land Acquisition and Involuntary Resettlement Policy; a Corporate Social Responsibility Policy; a Health, and Safety Policy; and a Labor and Human Rights Policy.

4.1.c Identification of Risks and Impacts

As part of its initial EIA, the Project assessed its potential E&S risks and impacts. Later, in March 2019, a complementary Risk and Impacts Assessment was completed, using for that purpose a Process Interaction Matrix methodology, which identified 314 risk factors.

Project key impacts include the following: (i) impacts to threatened marine mammals and sea turtles, especially from dredging and pile driving activities; (ii) displacement of threatened terrestrial mammals; (iii) impacts to artisanal fisherfolk; (iv) indirect impacts to local communities, including ethnic minority communities, due to population influx during construction (e.g., from construction workers) and operation (e.g., from Project-induced population growth); (v) impacts to roadside populations from Project-related traffic during construction and operation; (vi) impacts to non-Project marine traffic during construction and operation; and (vii) displacement of jobs of workers in the banana shipping operations currently occurring in the Project area.

The Project has not yet conducted a Cumulative Impact Assessment. Regarding an analysis of alternatives, the Colombian environmental authority did not require such analysis as part of the EIA process. Nevertheless, during its pre-feasibility stage, the Project conducted a limited analysis of alternatives in relation to the Project’s potential intersection with a nearby protected area. Furthermore, the Project analyzed the “no project scenario” as part of the EIA in order to comply with the environmental authority’s requirements.

4.1.d Management Programs

The Project developed a series of E&S management and monitoring plans as part of the EIA process, and has been modifying and supplementing these plans over the past year in response to continued feedback from IDB Invest and potential co-lenders. The plans are currently in varying stages of completion. Once completed, the Project will integrate all these plans into an overarching Project-

level Environmental and Social Management Plan (ESMP). The ESMP will in turn comprise the backbone of the ESMS.

4.1.e Organizational Capacity and Competency

The Project currently has two E&S managers: a Social Manager and an Environment, Health and Safety (“EHS”) Manager. Two assistants report to the Social Manager, who also oversees third-party consultants hired to assist with discreet tasks. Project Sponsor staff, experienced with managing the EHS aspects of other ports financed by development finance institutions, will begin to support the EHS manager once the project nears the construction stage. In addition, the Project has hired two external consulting firms—one local and one international—expressly to ensure the Project is designed, built and operated in accordance with international E&S standards. All project managers will receive training in the IFC Performance Standards prior to the closing of the Project’s financing.

During the operational stage, the Project structure contemplates a fully staffed E&S department. The department will be led by an E&S Director, an Environmental Coordinator, and an EHS Coordinator, and will include an Abiotic Team, a Biotic Team, a Social Team, a GIS Team, and a junior environmental engineer.

4.1.f Emergency Preparedness and Response

As part of the EIA process, the Project developed a Contingency Plan in which it evaluates various emergency-relate risks. Subsequently, the Project prepared an Emergency Response Plan that identifies emergency response actions in general terms as well as a more complete Emergency Preparation and Response Plan. This last plan provides a solid basis on which the Project will now develop a full-fledged Emergency Preparedness and Response Plan commensurate with the nature and scale of the Project’s risks.

4.1.g Monitoring and Review

As part of the EIA process, the Project developed an extensive series of monitoring plans for tracking the biotic, abiotic, and social Project-related impacts. The Project is committed to updating and supplementing these plans in order to reach full compliance with PS1.

The Project will also be monitored by social and environmental authorities, the Environmental and Social Independent Consultant, and the Lenders’ environmental and social teams.

4.1.h Stakeholder Engagement

The Project’s Stakeholder Engagement Plan (“SEP”) reflects a broad analysis and identification of Project stakeholders, and clearly differentiates between affected and interested parties. Project stakeholders identified in the SEP include: local communities, fisherfolk associations, Afro-Colombian Community Councils, educational institutions, religious groups, economic groups, academic institutions, local and municipal authorities, the Urabá Regional Environmental Corporation, maritime authorities, armed forces and other governmental institutions at the regional

and national level, and banana producers, among others. Affected parties are identified in the SEP, and the SEP includes activities to engage and consult with these parties.

During the E&S due diligence process (ESDD), several other stakeholder groups were identified and these will be incorporated into the SEP.

A Spanish version of the EIA has been made available at the Nueva Colonia Library and the Project's mobile office in the community. Furthermore, the Project has disclosed Project-related information actively and appropriately as part of its overall stakeholder engagement strategy. Interviews conducted by IDB Invest's E&S consulting firm with community members and authorities found that the Project has disclosed relevant and pertinent Project information. Community leaders and members interviewed understand the Project's impacts and opportunities and are active participants in various coordination mechanisms to follow up on impacts and management plans.

The Project actively participates in the following groups: (i) *Comité Técnico Territorial y Comunitario de Nueva Colonia* (CTTNC), a community-based coordination and decision-making mechanism representing the *Consejo Mayor de Comunidades Negras de Nueva Colonia* (COMANUCO); (ii) *Juntas de Acción Comunal*; (iii) *Asociación de Pescadores Artesanales de Nueva Colonia* (APEANCO); (iv) *Asociación de Mujeres Productivas de Nueva Colonia*; and (v) *Representantes del área rural de Comunal San Jorge and Vereda Nueva Unión*. The Project is also a member of the *Río Grande Junta de Acción Comunal*, and other local organizations. Through its participation, the Project has engaged and reached agreements with a wide array of stakeholders.

4.1.i External Communication and Grievance Mechanisms

The SEP includes sound procedures and methods for external communications with specific stakeholders. The Project will manage and evaluate external communications based upon Performance Standard 1 and ISO 14000 requirements.

The SEP also includes a Community Grievance Mechanism ("CGM") for managing community grievances. The CGM is easily accessible by stakeholders through a variety of means and includes clear procedures for disclosure of the CGM among communities within the Project's area of influence. It also includes procedures for the receiving, screening and managing complaints, as well as for responding to complaints within the time limits established by Colombian Law. The Project will further enhance its CGM to include the following: (i) procedures to receive, manage and respond to complaints that are anonymous; (ii) procedures for conducting root-cause analyses; (iii) procedures for determining remedial actions for repetitive, high-risk grievances; (iv) a system for ranking complaints based on level of risk; and (v) a schedule and procedure for the CGM's regular review and update.

4.2 Labor and Working Conditions

The Project workforce is expected to approach 1,200 workers at the peak of construction. During operations, the average direct workforce is expected to comprise approximately 500 workers. It is anticipated that the construction workforce will be mostly local. Memoranda of Understanding (MOUs) signed with the communities of Nueva Colonia, Puerto Girón and El Canal, specify that the

Project is committed to fill 80 percent of all direct construction jobs with regional residents—giving priority to members of local ethnic communities.

4.2.a Working Conditions and Management of Worker Relationships

The Project's Labor Management and Human Rights Policy states the Project's commitment to contractual and working conditions compliant with Colombian legislation and PS2. As PS2 requirements apply both to the Project and its contractors, the Project has included explicit provisions in the Labor Management and Human Rights Policy and in the EPC contract to ensure that the Project's own policies and the PS requirements are implemented by the EPC Contractor, sub-contractors and suppliers.

The Project contemplates a temporary worker camp that will house approximately 400 Project-related workers. It has also developed a Worker Accommodation Plan to manage the relationship between these workers and the surrounding communities which will be enhanced to include a Worker Code of Conduct and a prohibition on lodging workers in communities of ethnic minorities or other areas where the population is highly vulnerable.

The Labor and Human Rights Policy contains procedures for grievance management in cases related to sexual harassment and industrial safety. The Project is in the process of developing a Labor Management Plan, which will include a Worker's Grievance Mechanism that will be more comprehensive.

The Labor and Human Rights Policy also includes a general commitment to the protection of workers' rights as well as specific guarantees related to freedom of association and non-discriminatory management practices. It states the Project's prohibition of forced labor and child labor, and its acceptance of organized labor and collective bargaining. The Policy explicitly mentions The Project's commitment to United Nations and International Labor Organization principles, including equal pay and non-discriminatory labor practices.

The Project has submitted a draft Local Hiring Strategy, including sound principles and procedures for increasing employment opportunities among Project-affected communities. The Strategy has been discussed with affected communities and is reflected in MOUs signed with these communities. The Project has also developed strategic alliances with workforce training institutions dedicated to increasing employment rates among the local population. The Project will develop a Local Hiring Management Plan, that will include the following: (i) a database for tracking the hiring status of interested local workers; (ii) provisions for the training of interested local workers; (iii) a procedure for systematically documenting the justifications based on which any local applicants are rejected; and (iv) a procedure for providing periodic feedback to local communities on the Plan's implementation status.

The Project will develop a Construction Workforce Demobilization Plan.

4.2.b Occupational Health and Safety

The Project has developed a Worker Health and Safety Management Plan describing how the Project will address risks and impacts during the Project's construction phase. The goal of the Plan is "zero workplace incidents." Prior to the start of construction activities, the Project will develop an Occupational Health and Safety Plan to address in more detail the specific risks that workers will face. A key component of this Plan will be detailed procedures for investigating and analyzing any accidents that may occur during Project construction or operation.

4.2.c Workers Engaged by Third Parties

In its Labor and Human Rights Policy, the Project expresses its commitment to ensuring that subcontractors have recognized integrity and the capacity to implement an E&S management system compatible with the Project's policies and the PS requirements. To operationalize this commitment, the Project will develop a Contractor Management Plan aligned with IFC's [*Good Practice Note: Managing Contractors' Environmental and Social Performance*](#) (2017).

4.3 Resource Efficiency and Pollution Prevention

4.3.a Resource Efficiency

The Project has developed a Resource Efficiency and Pollution Prevention Plan, containing sub-plans for the following thematic areas: atmospheric and noise control; solid and hazardous waste; and pesticide use and management. Other energy efficiency aspects of the Project include the following: (i) ships arriving to the new port will be modern, with environmentally friendly technologies; (ii) natural gas powered trucks will be used for transporting cargo between the terrestrial terminal and the marine terminal; (iii) the length of time that ships stay in the Gulf of Urabá will be reduced to less than one third of current times; (iv) the Project will reduce the number of trips of tugboats, barges, vessels and personnel through the Río León and around the anchoring areas of the Gulf; and (v) most of the equipment that will operate in the port will be electrical (both STS gantry cranes and RTG yard cranes).

The Project carried out a Climate Change Analysis, which resulted in the definition of a series of climate change mitigation and adaptation measures that the Project plans to implement. These measures are based on the recommendations in the *Climate Change Management Plan for Maritime Ports of Colombia* (Ministerio de Ambiente y Desarrollo Sostenible, Ministerio de Transporte, INVEMAR 2017). The Project will quantify its greenhouse gas emissions following the guidance in the International Maritime Organization's *Port Emissions Toolkit--Guide No.01: Assessment of Port Emissions*.

During the construction phase, water use will be limited primarily to the provision of sanitary facilities, cleaning, preparation of concrete and cement mixtures, and control of dust on roads. The Project has obtained a license for water collection in the Río León at a rate of 1.5 l/s for the construction and operation phases. During construction, the Project is authorized to make industrial use of the water for manufacturing concrete and suppressing dust on roads. During operations, the

water intake will be 1.5 l/s from the Río León. This water will be used primarily to supply the fire system and to clean equipment and shipping containers.

4.3.b Pollution Prevention

The main impacts on air quality during the Project's construction phase will result from the operation of heavy machinery. General mitigation measures and management procedures for air emissions and air quality are presented in various management plans developed as part of the EIA process (e.g., Control of Atmospheric Emissions and Noise; Environmental Management of Vehicles, Machinery, Equipment, Ships and Naval Devices). These plans provide general recommendations related to the following aspects: controlling dust along roads; mitigating air emissions from mobile sources; and mitigating dust generation in the dry bulk solids area.

The management plans also include measures for monitoring compliance with national regulations. Air quality monitoring, for example, will be conducted in the Project's area of influence semiannually during the construction phase and annually during the operational phase. Sampling points will be located at the terrestrial terminal, at the marine terminal, and in Nueva Colonia.

Before construction begins the Project will develop a comprehensive plan dedicated to managing and monitoring air quality and airborne noise. The plan will address potential impacts related to noise and vibrations emanating from the construction and operation of the port and all associated facilities. The Project will also assess and manage the potential impacts of underwater noise—both during the construction phase (e.g., from pile-driving and dredging) and the operation phase (e.g., from increased ship traffic). Both the Air Quality, Airborne Noise and Vibration Management and Monitoring Plan, and the Underwater Noise Management and Monitoring Plan, will be aligned with the guidance in the World Bank Group's Environmental, Health and Safety Guidelines for Ports, Harbors, and Terminals.

Project waste streams generated during construction will include non-hazardous solid waste such as the following: food, paper, cardboard, and other scraps generated by workers; soils from earth-leveling activities; trees and limbs removed to open roads and for facilities construction; general construction debris; and concrete. Hazardous wastes will include oily wastes and solvents typical of large construction projects. The Project has developed the following plans that address the management of hazardous and non-hazardous wastes generally: (i) Environmental Management of Vehicles, Machinery, Equipment, Ships and Naval Devices; (ii) Integrated Management of Hazardous and Non-hazardous Solid Waste on Land, Dock, and Vessels; and (iii) Environmental Management of Water Resources. Furthermore, the Resource Efficiency and Pollution Prevention Plan specifies that two Colombian companies will assume solid waste management during construction and operation. Before the start of construction, the Project will update the Integrated Management of Hazardous and Non-hazardous Solid Waste on Land, Dock, and Vessels plan to ensure full compliance with PS 3.

Hazardous materials at port operations typically include large volumes of fuels, solvents, lubricants and other hazardous substances used in port activities by vessels, vehicles, and equipment. In order to deal with them and to control potential spills that may occur from accidents, equipment failures, or improper operating procedures during cargo transfers or fueling activities, the Project has

developed an Environmental Management of Fuels, Oils, and Lubricants on Land, Dock, and Boats Plan, which includes general management procedures to address this risk. Before the start of construction, this plan will be updated to ensure its full compliance with PS3.

The Project will produce wastewater effluents during construction mainly from portable bathrooms and the worker camp. Wastewater from portable bathrooms will be treated by a service provider authorized to carry out this activity. A wastewater treatment plant that will be installed for the camp, will treat domestic wastewater and water used for cleaning the facilities and will discharge 3 l/s, according to the Environmental License (Res. No 0078 of 2016, ARTICLE SEVEN, 2 - Permiso de Vertimientos). The Project will develop a Wastewater Management Plan that will reference the parameters and limits in the World Bank Group General EHS Guidelines (i.e., the Indicative Values for Treated Sanitary Sewage Discharges).

Since the Project site receives approximately 2,500 mm of rainfall per year, a Stormwater and Erosion Control Plan will be developed. This plan will include measures to stabilize the right bank of the Río León, which has experienced significant erosion in recent years.

The Project has developed a Pest Management Program which addresses the use of pesticides in a general manner. The Program will be updated so that it fully aligns with the requirements under the Pesticide Use and Management header in PS3, which includes the following requirements: implementation of an integrated pest management approach; selection of low-toxicity, targeted chemical pesticides; and prohibition of the use of products classified by the World Health Organization as Highly Hazardous.

4.4 Community Health, Safety and Security

4.4.a Community Health and Safety

Key Project risks related to community health and safety include the following: (i) potential transportation-related accidents (on roads, rivers and at sea); (ii) potential respiratory effects from dust and from engine emissions; (iii) spread of vector-borne diseases; (iv) transmission of communicable diseases (e.g., HIV/AIDS); (v) deterioration of living conditions or living standards due to population influx (worker and non-worker); (vi) nuisances from Project-related noise and vibrations; (vii) misconduct among private security forces; and (viii) accidents involving unexploded ordinances in the Project area. To address these and any other community health and safety risks, the Project will develop a Community Health and Safety Plan, incorporating the Project's existing Security and Human Rights Plan. This plan will also include procedures for regular follow-up with local communities regarding the plan's implementation.

To address diseases specifically, the Project has developed a Vector Management Plan containing preventative actions for protecting the health of workers and surrounding communities. The plan encompasses the following themes: camp management; camp closure policies; and sanitation of worker facilities. It also covers worker interactions with nearby communities and sexual health training.

Regarding Project-related emergencies that could affect local communities, the Project will include in its Emergency Preparedness and Response Plan procedures for addressing emergencies that could affect surrounding communities. The Plan will be developed in consultation with the affected communities.

4.4.b Security Personnel

The Project has prepared a Security and Protection of Human Rights Plan aimed at guiding the general provision of security within the Project's boundaries with a focus on respecting the human rights of the local population. The Plan includes a mechanism for complaints and follow-up through the CGM. Given the location of the Project in a post-conflict zone, the Project will take the additional step of developing a Security Forces Management Plan aligned with the following standards: (i) The IFC Good Practice Handbook—Use of Security Forces: Assessing and Managing Risks and Impacts; and (ii) The Voluntary Principles on Security and Human Rights. The Plan will include a procedure and schedule for consulting on the Plan with local communities, artisanal fisherfolk, and Port service providers.

4.5 Land Acquisition and Involuntary Resettlement

4.5.a General

The Project has developed a Land Acquisition and Involuntary Resettlement Policy consistent with PS5. The Policy is designed to guide any future land acquisition that the Project may need—although the such a need is not expected to arise.

To date, the Project has required the involuntary resettlement of 32 families living in 24 houses in the El Canal community. This community was located immediately adjacent to the Project's access road, on lands frequently flooded by rains. The entire community, except for two families, was relocated to new housing by the Project in 2013. The Project is in the process of arranging the relocation of the two remaining families.

The Project has prepared a Resettlement Completion Report for the El Canal community which confirms the following results: housing and services, including access to schools, have been duly provided to the new settlement; the sanitary and other living conditions in the new settlement exceed those in the original community; and the resettlement did not result in any significant disruption of livelihoods. The Project has obtained signed confirmations from each of the relocated families stating satisfaction with the relocation process and its outcomes. To ensure that the process is finalized in a manner compliant with IDB Invest's policies, the Project will close two remaining gaps: (i) the Project will ensure that all the relocated families gain legal title to their new lands; and (ii) the Project will build a boat dock for the resettled fisherfolk, as agreed during the resettlement negotiations.

Regarding potential economic displacement, the Project could potentially impact the livelihoods of three groups of people: (i) owners of business along the access road whose businesses may be affected by roadworks; (ii) artisanal fisherfolk; and (iii) workers in the current banana export logistics operations. In response, the Project will develop: (i) a Compensation Plan, including a procedure

for determining and dispensing compensation if the construction or operation of the Project results in economic losses to roadside business owners or to fisherfolk; and (ii) a plan to mitigate and monitor livelihood impacts to workers in the current banana transport system.

The Project has carried out a series of actions aimed at understanding its potential impact to fisherfolk. First, the Project conducted workshops in 2017 and 2018 with the participation of artisanal fisherfolk belonging to the three local fisherfolk associations: APEANCO, *la Asociación de Pescadores de Turismo* (ASOPESCATUR) and *Asociación de Pescadores de Puerto Girón*. In these workshops, fisherfolk identified a series of anticipated Project-related impacts. These included adverse effects on fishing grounds, limitations and changes to traditionally used fishing routes, and changes to cultural practices. Second, the Project has undertaken an artisanal fisheries baseline study to measure parameters such as the fisherfolk numbers, fishing techniques, and the contribution of fishing activities to the livelihoods of the fisherfolk. The baseline study is still ongoing, with work still pending to ensure that the statistics are inclusive of fisherfolk who are unassociated with any of the three local fisherfolk associations. The Project will update its Participatory Artisanal Fishing Monitoring Plan to ensure that any changes in the artisanal fishery relative to the baseline conditions are detected and addressed.

Since the Project's marine footprint does not significantly overlap with artisanal fishing grounds, any impacts to fisherfolk livelihoods are expected to be temporary. Nevertheless, prior to the initiation of any construction activities, the Project will carry out an objective, science-based evaluation of all the Project's potential risks and impacts in an effort to predict and quantify any such potential impacts *ex ante*.

The Project has already signed MOUs with the three local fisherfolk associations, committing to a series of mitigation and compensation measures, including the following: providing training and other technical support to improve artisanal fishing productivity, or developing activities that could generate alternative income for local fisherfolk. Such activities could include fish farming or the provision of ecotourism or maritime transportation services. The MOUs are grounded in alliances between the Project and strategic partners, including marine research academic institutions, governmental institutions that regulate fishing activities, the chamber of commerce, and tourism agencies.

4.6 Biodiversity Conservation and Natural Habitats

4.6.a General

As mentioned previously, the Gulf of Urabá is considered an ecoregion of great environmental value. It is heavily influenced by the Atrato River Delta on the western shore, which forms a complex, ecologically important ecosystem composed of mangroves, wetlands, rocky coastline and sandy beaches. The onshore Project elements will affect a total of 51.31 hectares of land, consisting of a mosaic of natural and modified habitats, categorized as natural pastures and flooded dense forests.

4.6.b Protection and Conservation of Biodiversity

According to the EIA, the following will be the main sources of impacts to biodiversity during Project construction: site clearing and preparation; construction of infrastructure; pile driving (995 piles for the offshore trestle and the viaduct); dredging a volume of approximately 2,000,000 cubic meters of bottom sediments; and disposal of dredge spoils at an offshore disposal site approximately four to six kilometers from the dredging site. The EIA defines the main sources of impacts during Project operation as follows: truck traffic on the viaduct; operation of cargo ships and tugs (during navigation, approach and anchoring); loading and unloading of cargo; operation of onshore cargo vehicle traffic; and maintenance dredging.

To determine the alignment of the access road, the Project worked in consultation with the national and regional regulatory agencies, *Autoridad Nacional de Licencias Ambientales* (ANLA) and the Regional Autonomous Corporation of Urabá Antioquia (CORPOURABÁ). As required by Colombian licensing procedures, the Project ultimately chose the option that minimized impacts to natural habitats.

Regarding the viaduct corridor, the alternatives analysis for its alignment was reviewed by ANLA and CORPOURABÁ, and the selected alternative was approved as part of the Environmental License. The Project chose the alignment that maximizes the portion located in degraded habitats and minimizes the portion that passes through coastal mangroves and adjacent natural habitats. The corridor will affect 0.93 hectares of land. The chosen alignment crosses what was formerly the extreme eastern edge of a protected area known as *Parque Natural Regional de los Humedales de los Ríos León y Suriquí*. As part of the licensing process, the corridor—which was already severely fragmented—was legally removed from the protected area (ANLA Res. No. 78/2016). No other protected areas are intersected by the Project or its associated facilities.

With respect to the configuration of the offshore platform, the Project has modified its design with the aim of reducing impacts to biodiversity. These modifications include the following: (i) construction phases were reduced from two to one, reducing the duration over which the local environment will be exposed to construction-related impacts; (ii) the footprint of the offshore terminal was reduced from 12.8 hectares to 5.2 hectares; (iii) the number of steel piles to be driven for the offshore platform was reduced from 3,100 to 995, significantly reducing underwater noise generation; (iv) the offshore area to be dredged was reduced by approximately 35 percent; and (v) the volume of marine sediments to be dredged was reduced by approximately 25 percent.

As part of the EIA process, the Project conducted field surveys to census the species within the Project's area of influence for terrestrial, marine and riverine ecosystems. The EIA report presents the IUCN Red List status of each species detected, as well as the status of each of these species on national lists of threatened species (Resolution 192/2014 and Colombian Red List). The surveys recorded the presence of 131 species. The following is a summary of the most significant findings for the purposes of this review:

Reptiles and amphibians. One threatened species was detected, *Chelonoids carbonaria* (Morrocoy Turtle), which is listed as Critically Endangered under both Resolution 0192/2014 and the Colombian Red List. The species is not listed as threatened on the IUCN Red List.

Birds. No vulnerable, endangered or critically endangered species were detected.

Terrestrial mammals. *Saguinus oedipus* (Cotton-headed Tamarin) is listed as Critically Endangered according to the IUCN Red List, and Vulnerable on the Colombian Red List. *Lontra longicaudis* (neotropical otter) is listed as Vulnerable on the Colombian Red List (Near Threatened on the IUCN Red List).

River and marine species. No threatened species were recorded. With regard to fish, only one species (*Astyanax* sp.), was recorded in the Río León river system.

Several other threatened species known to inhabit the Gulf were not detected as part of the EIA process, including the following: the Caribbean Manatee (*Trichechus manatus ssp manatus*—Endangered on both the IUCN and Colombian Red List; the Neotropical Otter (*Lontra longicaudis*—Vulnerable on the Colombian Red List; and four species of sea turtle (*Dermochelys coriácea*—Vulnerable on the IUCN Red List and Critically Endangered on the Colombian Red List; *Eretmochelys imbricate*—Critically Endangered on both the IUCN Red List and the Colombian Red List; *Caretta caretta*—Vulnerable on the IUCN Red List and Critically Endangered on the Colombian Red List; and *Chelonia mydas*—Endangered on both the IUCN Red List and the Colombian Red List).

The Project has developed a preliminary Invasive Alien Species Management Plan which will be revised to ensure that it aligns with the International Convention for the Control and Management of Ship's Ballast Water and Sediments. The Project's Biodiversity Monitoring Plan will also include procedures for early detection of invasive alien species.

The Project intends to adhere to international conventions applicable in Colombia regarding ballast water management by providing support to the Colombian Maritime Authority (DIMAR). DIMAR already has a presence in the Port of Turbo, approximately 15 kilometers to the north of the Project's proposed offshore facility, where it implements the ballast water management program for the 700 ships that call there each year.

4.6.c Management of Ecosystem Services

The EIA process assessed Project impacts on ecosystem services, as well as the dependencies of both the communities and the Project on these services. The assessment included semi-structured interviews with stakeholders in local communities. The most important ecosystem services identified related to those provided by the Gulf's fisheries to the region's fisherfolk. The Artisanal Fisheries Baseline and Impact Assessment and the Participatory Fisherfolk Monitoring Program, both described previously in this review, have been conceived to mitigate any potential impacts to these services.

4.6.d Sustainable Management of Living Natural Resources

The Project has developed a Biodiversity Loss Compensation Plan to address impacts to the protected area mentioned above and to other natural habitats expected to be impacted by the Project. Implementation of the plan will begin once Project construction is initiated. The entire compensation process (site selection, planting, and monitoring of success) will be carried out under the supervision of ANLA and CORPOURABÁ. It is estimated that the implementation of the

compensation plan will take approximately 5 years following a detailed schedule. The area to be restored will total 255.4 hectares, in compliance with national regulations requiring compensation factors of between 5:1 and 10:1 depending on the habitat type.

The Project is developing a Monitoring Plan for Biodiversity Conservation and Sustainable Management of Natural Resources which will be fully aligned with PS6.

The Project has also committed to develop the following additional biodiversity-related management instruments to fully comply with the requirements of PS6: (i) a Critical Habitat Assessment to identify and delineate, in an academically rigorous manner, all areas of Critical Habitat in the Project's area of influence; (ii) a Biodiversity Impact Assessment to identify in detail the ways in which the Project could adversely impact the surround biodiversity, with a special focus on assessing impacts to Critical Habitats; and (iii) a Biodiversity Action Plan to address, according to the mitigation hierarchy, the potential impacts identified via the Biodiversity Impact Assessment. The Project will also update its Dredging Monitoring and Management Plan, as described in the ESAP, to ensure full alignment with relevant international standards and the protection of the surrounding ecosystems.

4.7 Indigenous Peoples

4.7.a General

Two Afro-descendant ethnic minority groups, both officially recognized by the Colombian Government, are present in the Project's area of influence: the *Consejo Comunitario de Puerto Girón* (Puerto Girón¹); and, the *Consejo Comunitario Mayor de Comunidades Negras de Nueva Colonia* (COMANUCO²). Neither of these two groups has yet been assigned a collective territory under Colombian Law. Nevertheless, to different degrees, both have a collective attachment to their respective territories, make traditional use of natural resources, and have social, or political institutions different from those of mainstream society.

The Project area is characterized by a lack of formalized property rights and unassigned collective lands. The area has a history of forced displacements and dispossession of land rights. Port-induced economic development in the area has the potential to exacerbate these conditions. The result could be increased risks to the traditional cultural practices of afro-descendent communities, to their access to natural resources, and to their collective land rights. Worker influx and Project-related traffic also present Puerto Girón and COMANUCO with potential risks related to community health and safety and to their traditions and living standards. Temporary Project-related disruptions of artisanal fishing routes may potentially impact the livelihoods of fisherfolk from these communities.

Benefits of the Project to these communities include local employment opportunities, Project investments in local development, and the Project's benefit-sharing program during port operations (the Project has committed to dedicate a percentage of its revenues to local development projects).

¹ Recognized by Resolution 049 of the Ministry of Interior issued on June 04, 2013

² Recognized by Resolution 023 of the Ministry of Interior issued on March 20, 2018

Puerto Girón also is expected to benefit from a significant reduction in barges passing by the community along the León River.

4.7.b Circumstances Requiring Free, Prior, and Informed Consent

The Project has duly obtained certifications from the Ministry of the Interior, Directorate of Previous Consultation, whereby the Directorate determined that, given the characteristics of the project, no direct affectation to the rights of the community of Puerto Girón was identified, and therefore, it is not mandatory to conduct the prior consultation (*Consulta Previa* in Spanish) protocol with said community. Furthermore, in February 2019 the Project received an official correspondence from the Ministry of Interior expressing the Ministry's conclusion that, "in the area of the Project there is no evidence of the presence of ethnic communities (Indigenous Communities, Rom and Minorities, Black Communities, Afro-descendants, *Palenqueras*, or *Raizales*) and therefore, for the execution of the said Project, it is not appropriate to advance a process of prior consent."³

Nevertheless, the Project has, on its own accord, obtained and maintained the Free, Prior and Informed Consent of both Puerto Girón and COMANUCO. The ESDD confirmed that the Project has shared pertinent information in a free and prior manner and reached agreement with the communities pursuant to a mutually accepted process. The ESDD also confirmed strong support for the Project from both COMANUCO and Puerto Girón. During the field visit in March 2019, the IDB Invest Project Team met with representatives from the two communities and received confirmation of Free, Prior and Informed Consent (FPIC) from community leaders. The leaders confirmed that the Project has carried out good faith negotiations with regard to Project employment and social investment programs to support community development initiatives. They declared that they know the details of the Project and understand the Project's impacts. Written evidence of FPIC was reviewed by IDB Invest, including community meeting records as well as the MoUs signed with the *Comité Técnico Territorial de Nueva Colonia* (of which COMANUCO is member) and Puerto Girón.

The Project's FPIC process encompassed the following elements:

- (i) A prior-to-the-Project information and engagement process formally started in 2018 with the two communities.
- (ii) A mutually accepted process adapted to the communities' language needs and decision-making procedures, which consisted of a free information exchange and consultations on Project-related matters. The outcomes of these exchanges and consultations were reflected in formal agreements, to be jointly followed up on by the Project and the respective *Consejos Comunitarios*, with a special focus on actions and programs agreed to in the signed MoUs.
- (iii) Signed MoUs and agreements aimed at supporting training programs and defining a road map to support and protect traditional cultural practices, ongoing ethno-education initiatives and collective rights.

³ OFI19-2386-DCP-2500, p.4: "En conclusión y dando respuesta a su comunicación en la que se indica que 'con estas tres expeditas manifestaciones de voluntad de la administración gubernamental, por parte del órgano competente en materia de Consulta Previa, se nos ratifique esta consideración, habida cuenta de la certeza jurídica que se requiere de la no presencia de comunidades étnicas para a implementación del Proyecto', esta Dirección se permite ratificar lo expresado en los documentos anteriormente reseñados, esto es, que en el área del "PROYECTO PUERTO BAHIA COLOMBIA DE URABÁ", NO SE EVIDENCIA presencia de comunidades étnicas (Comunidades Indígenas, Rom y Minorías, Comunidades Negras, Afrodescendientes, Palenqueras, Rom ni raizales), razón por la cual, para la ejecución del mismo, no es procedente adelantar proceso de consulta previa."

- (iv) Written statements of support for the Project and mutual willingness to engage, contained in MoUs and verbally conveyed to IDB Invest's E&S consultant and members of the Project Team in field visits carried out in 2018-2019.
- (v) Oral confirmation from representatives of both communities that they were not coerced or intimidated into supporting the Project.

The Project has committed to inform the communities in a culturally appropriate manner regarding the conclusions of the Project's Risk and Impact Assessment. The Project will likewise inform the communities regarding the mitigation measures the Project develops as it completes its ESMS. Once the communities are duly informed, and before initiating any construction activities, the Project will ensure that it still has the communities' consent.

4.7.c Mitigation and Development Benefits

The Project has engaged COMANUCO and Puerto Girón in impact assessment exercises and has reached agreements recorded in MoUs (one with Puerto Girón and the other with the *Comité Técnico Territorial y Comunitario de Nueva Colonia*). The MoUs signed with the communities, as well as those signed with fisherfolk associations, include the extension of specific Project benefits such as training, temporary employment and capacity building. The MoUs also include agreements to improve the efficiency of artisanal fishing and to contribute to other income-generating activities. Taken together, these agreements constitute a strategy to mitigate Project-related adverse economic impacts on the communities. Project documentation and interviews conducted with community leaders confirm that the MoUs contain community development strategies that respond to genuine aspirations of the communities.

The Project will prepare an Indigenous People's Development Plan and a Monitoring Plan for COMANUCO and Puerto Girón, with a focus on the protection of traditional cultures and collective territories.

4.8 Cultural Heritage

4.8.a Protection of Cultural Heritage in Project Design and Execution

Cultural heritage issues were adequately addressed during the EIA process and the subsequent update. With the assistance of authorized, qualified and officially registered archaeologists, and in close consultation with the *Instituto Colombiano de Antropología e Historia* (ICANH), the Project undertook Archaeological Prospective Studies, including terrestrial and subaquatic archaeological surveys⁴.

The terrestrial survey reports no evidence of pre-Hispanic occupation or critical cultural sites in the onshore area. The subaquatic survey areas included the designated port dredging area and the planned dredging spoils deposit. The survey was conducted using standard and reliable remote sensing technologies (side scan sonar, magnetometer and echo sounder). Whenever possible, visual inspections were also undertaken. The surveys did not reveal any cultural heritage resources.

⁴ The corresponding report was approved by the ICANH on June 17, 2016.

Consistent with Colombian legislation on Cultural Heritage, the Project prepared a Cultural Heritage Management Plan (CHMP) aligned with PS8 requirements. The Project's Archaeological Management Proposal (FICHA 7) of its Environmental License includes a Preventive Archaeological Program based on procedures in the event of archaeological finds during the construction phase. The EIA states that construction activities are to be suspended if cultural remains are found and requires involvement of the corresponding local and national authorities. In addition, ICANH recommends supplemental archaeological monitoring of dredging works.

The Project's CHMP includes the participation of a cultural heritage specialist with stop-work authority, to monitor construction activities, make an initial determination, coordinate with ICANH, and undertake initial rescue efforts for all sites and construction activities requiring soil removal. If cultural heritage resources are found, the contractor must stop activities, inform the Project and jointly engage in an Action Plan before resuming dredging and or construction activities.

5. Local Access of Project Documentation

The documentation relating to the project can be accessed at the following link:
<https://puertoantioquia.firmex.com/projects/1/documents>.

The physical addresses where Project documentation can be accessed is:

1. 104th Street 101-15 level 8, Chamber of Commerce of Urabá, Apartadó – Antioquia, Colombia
2. Mobile office Nueva Colonia –Turbo (Antioquia), Colombia
3. Mobile office Puerto Girón – Apartadó (Antioquia), Colombia

6. Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Deliverable	Deadline
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Organizational Capacity	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.	Financial Close
1.2	Organizational Capacity	Actively disseminate the Project's E&S policy to all Project employees.	Evidence of policy dissemination (e.g., signed induction records).	First Disbursement
1.3	Risk and Impact Identification	Update the Project-level Risk and Impact Assessment, ensuring that it identifies and treats distinctly 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.	Financial Close
1.4	Risk and Impact Management	Develop an ESMS for the Project, consistent with PS 1, integrating all environmental and social 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 Environmental and Social Management System.	Financial Close
1.5	Organizational Capacity	Define and document the organizational structure for the Project's environmental and social management, showing that the Project has sufficient human resources to implement the Project's ESMS.	Project organizational chart including environmental and social positions and their descriptions, included in the ESMS.	Financial Close
1.6	Risk and Impact Management	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.	Prior to signing the EPC contract
1.7	Stakeholder Engagement	Update the Stakeholder Engagement Plan to be consistent with PS 1.	Stakeholder Engagement Plan.	Financial Close
1.8	Emergency Response and Preparedness	Develop an Emergency Preparedness and Response Plan consistent with PS 1.	Emergency Preparedness and Response Plan.	Financial Close
1.9	Risk and Impact Management	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 IDB Invest Environmental and Social Sustainability Policy.	Executed legal agreements containing appropriate contractual clauses.	Prior to signing any legal agreements with relevant owners, operators or contractors
1.10	Risk and Impact Management	Regarding the existing road from Rio Grande to Nueva Colonia:	1. Environmental and social baseline studies.	1. Financial Close 2. Financial Close

No.	Aspect	Action	Deliverable	Deadline
		1. Conduct environmental and social (including socioeconomic) baseline studies in consultation with the affected population. 2. Conduct an environmental and social risk assessment in consultation with the affected population; 3. Develop an Environmental and Social 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 environmental and social supervision of these roadworks into the Project's ESMS; and 5. Ensure that roadworks contractors are legally obliged to implement the management plans.	2. Environmental and social 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.	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
1.11	Risk and Impact Management	Regarding the A3 alternative access road: 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 3. Incorporate environmental and social supervision of these roadworks into the Project's ESMS.	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. 3. Documentation demonstrating that supervision plans have been incorporated into the Project's ESMS.	1. Second Disbursement 2. Prior to any contracts being signed for these roadworks Second Disbursement 3. Prior to any contracts being signed for these roadworks
1.12	Risk and Impact Management	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 Environmental and Social Sustainability Policy; and 2. Incorporate environmental and social 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 Environmental and Social 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.
1.13	Risk and Impact Management	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.	Financial Close
1.14	Analysis of Alternatives	Incorporate all existing Project-related analyses of alternatives into a single document and include a "without-project" scenario.	Consolidated Analysis of Alternatives.	Financial Close
1.15	Compliance with Local Laws and Regulations	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).	Financial Close

No.	Aspect	Action	Deliverable	Deadline
PS 2: Labor and Working Conditions				
2.1	Labor Management	Develop a Local Hiring Management Plan.	Local Hiring Management Plan.	Financial Close
2.2	Worker Accommodations	Update the Worker Accommodation Plan to be consistent with PS 2.	Worker Accommodation Plan.	Financial Close
2.3	Worker Accommodations	Oblige principal contractors to implement the Worker Accommodation Plan.	Executed contracts with [principal contractors] including requirement to implement the Worker Accommodation Plan.	First Disbursement
2.4	Worker Health and Safety	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
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Waste Management	Update the Solid Waste Management Plan to be consistent with PS 3.	Solid Waste Management Plan.	Financial Close
3.2	Pollution Prevention	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.	Financial Close
3.3	Pollution Prevention	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.	Financial Close
3.4	Climate Change Mitigation	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				
4.1	Traffic Management	Develop a Traffic Management Plan, with participation from roadside residents and business owners.	Traffic Management Plan. 1.	First Disbursement
4.2	Traffic Management	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
4.3	Traffic Management	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
4.4	Community Grievance Mechanism	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.	Financial Close
4.5	Community Health and Safety	Develop a Community Health and Safety Management Plan to be consistent with PS 4.	Community Health and Safety Management Plan.	Financial Close
4.6	Security Forces Management	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.	Financial Close
4.7	Community Health and Safety	Develop a Worker Influx Management Plan.	Worker Influx Management Plan.	Financial Close
PS 5: Land Acquisition and Involuntary Resettlement				
5.1	Land Acquisition	Update the Land Acquisition and Involuntary Resettlement Policy to be consistent with PS 5.	Updated Land Acquisition and Involuntary Resettlement Policy.	Financial Close

No.	Aspect	Action	Deliverable	Deadline
5.2	Land Acquisition	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
5.3	Land Acquisition	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 1.
5.4	Land Acquisition	Complete the resettlement process for any remaining families in El Canal in accordance with PS 5.	Evidence of finalization of resettlement process.	First Disbursement
5.5	Economic Displacement	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
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Dredging Management	Update the Dredging Monitoring and Management Plan to be consistent with PS 6.	Dredging Monitoring and Management Plan.	First Disbursement
6.2	Dredging Management	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
6.3	Biodiversity Conservation	Conduct and document a Critical Habitat Assessment in collaboration with qualified marine mammal specialists.	Critical Habitat Assessment.	Financial Close
6.4	Biodiversity Conservation	Conduct a Biodiversity Impact Assessment aligned with PS 6.	Biodiversity Impact Assessment.	Financial Close
6.5	Biodiversity Conservation	Develop a Biodiversity Action Plan.	Biodiversity Action Plan.	First Disbursement
6.6	Biodiversity Conservation	Update the Biodiversity Monitoring Plan to be consist with PS 6.	Biodiversity Monitoring Plan.	First Disbursement
6.7	Ecosystem Services Management	Update the Participatory Artisanal Fishing Monitoring Plan to be consistent with PS 6.	Participatory Artisanal Fishing Monitoring Plan.	Financial Close
6.8	Biodiversity Conservation	Hire enough Marine Fauna Observers to carry out the monitoring specified in the Biodiversity Action Plan.	Signed contracts and terms of reference for Marine Fauna Observers.	The sooner of First Disbursement or commencement of dredging or piling activities
PS 7 Indigenous Peoples				
7.1	Free, Prior and Informed Consent	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 Environmental and Social Monitoring Consultant confirming that the Project has the Free, Prior and Informed Consent of each community.	Financial Close
7.2	Indigenous Peoples Development Planning	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.	Financial Close