

**LA UNION – COLOMBIA**  
**Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Assessment and Management System	1. Incorporate social elements (stakeholder engagement, community grievance mechanism, and ongoing reporting to affected communities) into the Project's Environmental and Social Management System (ESMS).	1. Updated ESMS	1. Prior to first disbursement
		2. Implement the ESMS.	2. Evidence of ESMS implementation	2. As part of the Environmental and Social Compliance Report (ESCR)
1.2	Organizational Capacity	1. Provide an Environmental and Social (E&S) Staffing Plan for the Project, to include: i) organizational chart; ii) brief description of roles and responsibilities; and iii) biographies or curriculum vitae of key personnel.	1. E&S Staffing Plan	1. Prior to construction
1.3	Emergency Preparedness and Response	1. Update the solar plant's Contingency Plan and the transmission line's Risk Management Plan to assess the risk of and respond to incidents of sabotage.	1. Updated Contingency Plan and Risk Management Plan	1. Six months after first disbursement
		2. Implement the Contingency Plan and Risk Management Plan.	2. Evidence of Contingency Plan and Risk Management Plan implementation	2. As part of the ESCR
1.4	Stakeholder Engagement Plan	1. Finalize the Project's Community Relations Plan, to include procedures to publicize the Project's External Grievance Mechanism to local communities.	1. Updated Community Relations Plan	1. Prior to first disbursement
		2. Implement the Community Relations Plan.	2. Evidence of Community Relations Plan implementation	2. As part of the ESCR
PS 2: Labor and Working Conditions				
2.1	Human Resources Policies and Procedures	1. Develop an Internal Work Regulation for the Project, to include information on: i) working conditions and terms of employment; and ii) retrenchment.	1. Internal Work Regulation	1. Prior to first disbursement
		2. Implement the Internal Work Regulation.	2. Evidence of Internal Work Regulation implementation	2. As part of the ESCR
2.2	Occupational Health and Safety	1. Develop an Occupational Health and Safety (OHS) Plan for the Project.	1. Occupational Health and Safety Plan	1. Prior to construction
		2. Implement the OHS Plan.	2. Evidence of OHS Plan implementation	2. As part of the ESCR
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Waste Management	1. Update the Project's Waste Management Plan to include procedures for the recycling/disposal of solar modules.	1. Updated Waste Management Plan	1. Prior to operations
		2. Implement the updated Waste Management Plan.	2. Evidence of Waste Management Plan implementation	2. As part of the ESCR
3.2	Hazardous Materials Management	1. Develop a Hazardous Materials Management Plan with procedures for the safe storage of the Project's hazardous materials.	1. Hazardous Materials Management Plan	1. Prior to first disbursement
		2. Implement the Hazardous Materials Management Plan.	2. Evidence of Hazardous Materials Management Plan implementation.	2. As part of the ESCR
3.3	Pesticide Use and Management	1. Develop a Pesticide Management Plan for the Project.	1. Pesticide Management Plan	1. Prior to first disbursement
		2. Implement the Pesticide Management Plan.	2. Evidence of Pesticide Management Plan implementation	2. As part of the ESCR

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PS 4: Community Health, Safety, and Security				
4.1	Security Personnel	1. Develop a Security Management Plan for the Project, to include: i) procedures for the vetting of security personnel; ii) policies on the use of force; and iii) requirements for human rights training.	1. Security Management Plan	1. Prior to first disbursement
		2. Conduct an assessment of the risk to the Project posed by the nearby Clan del Golfo and update the Security Management Plan to include the results and include procedures to mitigate any identified risks.	2. Updated Security Management Plan	2. Six months after first disbursement
		3. Implement the Security Management Plan.	3. Evidence of Security Management Plan implementation	3. As part of the ESCR
PS 5: Land Acquisition and Involuntary Resettlement				
5.1	Easements	1. Obtain all transmission line easements and provide a report on each property that required judicial imposition.	1. Transmission line easement report	1. Prior to construction of the transmission line
PS 7: Indigenous Peoples				
7.1	Indigenous Peoples	1. Periodically communicate with the DANCP to determine if prior consultation is required with any newly recognized ethnic groups in the Project's AOI.	1. Evidence of communication	1. Prior to first disbursement and thereafter as part of the ESCR
PS 8: Cultural Heritage				
8.1	Protection of Cultural Heritage in Project Design and Execution	1. Obtain ICANH approval of an Archaeological Management Plan for the transmission line.	1. Archaeological Management Plan and ICANH Resolution	1. Prior to construction of the transmission line