



CONFIDENTIAL

DOCUMENT OF THE INDEPENDENT CONSULTATION AND INVESTIGATION MECHANISM

MICI-CII-CO-2018-0133

MONITORING PLAN

ITUANGO HYDROELECTRIC PLANT

(11794-04) (11794-04, 3818C/OC-CO-1, 3818C/OC-CO-2, 3818/CH-CO)

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LINKS

- 1. MICI public registry case file for Request MICI-CII-CO-2018-0133 https://mici.iadb.org/en/cases/MICI-CII-CO-2018-0133
- 2. Original Request https://www.iadb.org/document.cfm?id=EZSHARE-1002559224-169
- Recommendation for a Compliance Review and Terms of Reference for case MICI-CII-CO-2018-0133 https://www.iadb.org/document.cfm?id=EZSHARE-1002559224-1245
- 4. Compliance Review Report MICI-CII-CO-2018-0133 https://www.iadb.org/document.cfm?id=EZIDB0000559-1002559224-56507
- 5. Action Plan https://www.iadb.org/document.cfm?id=EZIDB0000559-1002559224-56621

ABBREVIATIONS

Management The IDB Invest manager or managers, executives, or chiefs of

division in charge of the relevant IDB Invest-financed operation, or

any delegate thereof

IDB Group Institution that supports the private sector, formerly IIC.

IDB Invest In November 2017, the IIC was rebranded as IDB Invest (in

English) and BID Invest (in Spanish, French and Portuguese)

IFC International Finance Corporation

Client Empresas Públicas de Medellín

ESDD Environmental and Social Due Diligence

Board of Executive Directors of IDB Invest

EIS Environmental Impact Study

CP Consultation Phase

CRP or Phase MICI's Compliance Review Phase

IDB Group Inter-American Development Bank Group

MICI or Mechanism IDB Group Independent Consultation and Investigation Mechanism

PS Performance Standard

ESAP Environmental and Social Action Plan
ECP Emergency and Contingency Plan

Action Plan IDB Invest Action Plan to comply with MICI recommendations

Expected time frame Time frame established in the Action Plan

MICI Policy Policy Policy of the Independent Consultation and Investigation

Mechanism of the IIC (CII/MI-1-4)

ROP Relevant Operational Policies

Project The Ituango Hydroelectric Project

Requesters Group of people who submitted the request before the MICI

Executive Summary

The Ituango Hydroelectric Project is a hydroelectric power generation project with a final installed capacity of 2,400 MW, eight generation units and an estimated investment of USD 5,508 million. It is located on the Cauca River in the Department of Antioquia. The Project's construction began in March 2011 and it is expected to be the largest hydroelectric power generation project in Colombia, accounting for 17% of the country's installed capacity. The main works are located in the cities of Ituango and Briceño. This area (comprised by subregions North, West and Bajo Cauca) faces challenges related to poverty, lacking access to utilities, and security. The towns of the Department of Antioquia have been historically affected by armed conflict and, despite the recent peace process, multiple illegal armed groups still operate there.

The IDB Group participated in the Project through two operations: i) an unsecured USD 1 billion corporate loan granted to Empresas Públicas de Medellín, ESP (EPM) to support the construction of the Ituango Hydroelectric Project approved by the Executive Directors of the IIC and the IDB on November 30, 2016; and ii) technical cooperation by the IDB for the first stages of the Project involving preliminary assessment of its financial, economic, technical, social and social-environmental aspects.

During the months of April and May 2018, the Project faced an emergency due to the collapse of slopes that obstructed the detour tunnels, causing the filling of the reservoir and the obstruction of the road to the city of Ituango, as well as the partial flooding of several townships, and leading to displacement of the population. To deal with the emergency, the company activated a contingency plan.

On June 5, 2018, MICI received a request related to the Project, signed by 472 people, organized in 15 community groups, residents of nine municipalities in the Department of Antioquia, Colombia, who are represented before the Mechanism by the organization Movimiento Ríos Vivos (hereinafter MRV) and are accompanied by three non-governmental organizations. The request alleged various non-compliances with the provisions of the Relevant Operational Policies by both IDB and IDB Invest, as well as with the Performance Standards of the International Finance Corporation related to the identification and management of social and environmental impacts in the design, construction and operation of the project, which have allegedly deepened and expanded during the emergency that occurred in April 2018.

On September 26, 2018, the Request was deemed eligible by the MICI. On December 7, 2018, the case was submitted to the Compliance Review Phase (CRP) and on October 29, 2019, the Board approved the Recommendation for a Compliance Review (Recommendation). In December 2021, due to the prepayment of the loan by EPM, IDB Invest left the Project.

On October 10, 2023, the Executive Directors Board approved the Compliance Review Report issued by the CRP. Said investigation excluded aspects related to an eventual compensation for alleged damages, including moral damages, caused by the risks of collapse of the dam, which were also under dispute in legal proceedings at the local level, and the analysis of the possible

causes or natural technical reasons that led to the 2018 contingency situation. Likewise, as a result of the Investigation, MICI concluded that IDB Invest failed to comply with certain requirements of the OP-703 (Environment and Safeguard Compliance), OP-704 (Disaster Risk Management), OP-761 (Gender Equality in Development), PS1 (Assessment and Management of Social and Environmental Risks and Impacts), PS4 (Community Health and Safety), PS5 (Land Acquisition and Involuntary Resettlement), PS6 (Conservation of Biodiversity and Sustainable Management of Living Natural Resources), PS8 (Cultural Heritage) and the IIC Environmental and Social Sustainability Policy.

Based on the findings of the investigation, MICI included sixteen recommendations for consideration by the Board to address the non-compliances found in the case. The recommendations were approved by the Board of Executive Directors on October 10, 2023. The Board requested that IDB Invest develop an action plan and that MICI monitor its implementation. This action plan was approved by the Board on June 4, 2024 and monitoring will continue for a maximum of five years from that date.

The present document is the monitoring plan. It was developed in consultation with the Requesters and IDB Invest, who were sent a draft in order to submit their comments. The final version of the monitoring plan, once the comments submitted by the Parties have been duly considered, is distributed for the Board's information, informed to the Parties, and made available to the general public through the <u>Public Registry of the case</u>.

During the monitoring process, MICI will analyze the completion of the activities set forth in the action plan with the aim of ensuring that said activities are completed according to the ROP and that any activity that failed to comply is addressed during the investigation. The results of the monitoring process are reflected in the annual monitoring reports prepared by MICI, which will be published in the <u>Public Registry of the case</u>.

I. Case background

- 1.1 On November 30, 2016, The Board of Executives of the IIC and the IDB approved an unsecured corporate loan to Empresas Públicas de Medellín, ESP ("EPM" or "the company") to support the construction of the Ituango Hydroelectric Project for USD 1 billion. The A/B loan structure includes part A of USD 300 million from IDB Group, USD 50 million from a cofinancing fund by the Government of China, administered by IDB Invest, and part B of USD 650 million supplied by commercial international banks and institutional investors from North America, Europe and Asia (CDPQ, KFW IPEX, BNP Paribas, ICBC, Sumitomo Mitsui, BBVA, and Banco Santander). The project was environmentally classified as category A, due to the identification of highly significant environmental and social impacts and risks.
- 1.2 In addition to this operation, the Project was supported in its early stages by the IDB through a technical cooperation operation for the initial assessment of the Project in the financial, economic, technical, social and environmental aspects.³
- 1.3 The Ituango Hydroelectric Project is located in the Department of Antioquia, less than one kilometer north of the Ituango River and approximately 170 km from Medellín. The Project's construction began in March, 2011 and it is expected to be the largest hydroelectric power generation project in Colombia, with an installed capacity of 2,400 MW that will enable the generation of 13,900 GWh per year⁴. At the time of completion of this document, four of the eight power generation units had begun operating.⁵
- 1.4 The main works are located in Ituango and Briceño, while the townships of Santa Fe de Antioquia, Buriticá, Peque, Liborina, Sabanalarga, Toledo, Olaya, San Andrés de Cuerquia, Valdivia and Yarumal contribute with premises for activities such as environmental compensation and the Project's complementary works.⁶ The towns of the Department of Antioquia have been territories historically affected by the armed conflict and, despite the recent peace process, multiple illegal armed groups still operate there.⁷ Since 1970, illegal armed groups, such as the Ejército Popular de Liberación (EPL), Ejército de Liberación Nacional (ELN), Fuerzas Armadas Revolucionarias de Colombia (FARC), and several paramilitary organizations have been present in the Bajo Cauca Subregion and have contributed to the conflict in the area, mainly with the aim of controlling the coca and gold extraction economy. The conflict in the Bajo Cauca Subregion intensified during the nineties, especially when the Autodefensas Unidas de Colombia (or United Self-Defenders of Colombia, a para-military group, hereinafter,

⁴ IDB Invest, <u>Ituango Hydroelectric Plant</u>.

¹ <u>Determination of Eligibility Memorandum</u>, section 1.7.

² Compliance Review Report, p. 2.

³ Ibidem, section 1.8.

⁵ EPM, EPM delivers on their promise to the country: units 3 and 4 of Hidroituango power generation plant are ready, October 27, 2023.

⁶ Compliance Review Report, p. 19.

⁷ Consultation Phase Assessment Report, sections 1.5 and 1.6.

"AUC") appeared in Córdoba and Urabá, and then, the Bloque Mineros and Bloque Central Bolívar of the AUC.8

- 1.5 The project was scheduled to begin commercial operation in June 2018 but during April and May of that same year the blockage of the auxiliary detour gallery or tunnel, which was built as part of the Project, caused an emergency situation that resulted in a sudden increase in the river's flow. This generated flooding of the areas near the dam, resulting in the final evacuation of approximately 17,000 people from the communities at higher risk, among other impacts. During the 2018 emergency, local, departmental and national authorities declared a public catastrophe in the Project's area of influence. Unified Command Posts were set up with the participation of the authorities, relief agencies and representatives of the Client, where the measures required to manage the contingency were adopted.⁹ Due to the Client's prepayment of the corporate loan to IDB Invest, the Bank left the Project in December 2021.¹⁰
- 1.6 **The request**. On June 5, 2018, MICI received a request submitted by the MRV and signed by 472 people¹¹ who are represented before the Mechanism by the MRV organization and accompanied by the Inter-American Association for Environmental Defense (AIDA), the Center for International Environmental Law (CIEL) and the International Accountability Project (IAP)¹². On June 11 the request was registered and on July 11 of the same year, the Management sent their response.¹³
- 1.7 The request alleged a number of non-compliances with IDB and IDB Invest's Relevant Operational Policies, as well as with the International Finance Corporation's Performance Standards related to: 1) absence of an adequate and complete environmental impact assessment, with no perspective of cumulative impacts; 2) absence of risk assessment of a possible emergency situation; 3) absence of an adequate social impact assessment; 4) failure to comply with procedures for citizen participation and access to information; 5) criminalization, death threats and homicides against communities and social leaders opposed to the Project; 6) forced evictions with disproportionate use of force; 7) lack of adequate compensation for evictions; 8) lack of an involuntary resettlement plan; 9) lack of gender perspective in the Project investment approval process; and 10) lack of access to sufficient information on the Project and its risks.¹⁴
- 1.8 **Eligibility.** On September 26, 2018, the Request was declared eligible by MICI as it met the eligibility criteria, although two specific issues were excluded from the MICI process: first, the recovery of bodies thrown into the Cauca River due to the armed conflict, since this issue could not be linked to an IDB Invest act or omission with respect to its environmental and social regulations; and, second, potential breaches of the Project

⁸ Compliance Review Report, p. 20.

⁹ Compliance Review Report, p. 25.

¹⁰ Compliance Review Report, p. 25.

¹¹ Compliance Review Report, p. 26.

¹² Original Request.

¹³ Compliance Review Report, p. 26.

¹⁴ Original Request.

- regarding national environmental standards were also excluded, as this issue is undergoing an active legal process.¹⁵
- 1.9 **Consultation Phase**. The case was transferred to the MICI Consultation Phase, which on December 7, 2018, decided to transfer the case to the CRP after considering that the conditions for a dialogue process were not favorable.¹⁶
- 1.10 **Recommendation.** On October 29, 2019, the Board of Executive Directors approved the Recommendation for a Compliance Review formulated by the CRP which decided to conduct an investigation to verify whether IDB Invest complied with its Environmental and Social Sustainability Policy, and particularly IDB Policies OP-703, OP-704, OP-710 and OP-761 and IFC's PSs1, 3, 4, 5, 6 and 8 regarding the allegations raised by the Requesters.¹⁷
- Investigation. On September 7, 2023, the Final Compliance Review Report was distributed to the Board of Executive Directors for their consideration. On October 10, 2023, The Board of Executive Directors approved the sixteen recommendations proposed by MICI. In the Compliance Review Report, it was concluded that IDB Invest failed to comply with certain requirements of OP-703 (Environment and Safeguard Compliance), OP-704 (Disaster Risk Management), OP-761 (Gender Equality in Development), PS1 (Assessment and Management of Social and Environmental Risks and Impacts), PS4 (Community Health and Safety), PS5 (Land Acquisition and Involuntary Resettlement), PS6 (Conservation of Biodiversity and Sustainable Management of Living Natural Resources), PS8 (Cultural Heritage) and the IIC Environmental and Social Sustainability Policy¹⁸, due to the following issues, among others.
 - Definition of the area of influence. Neither the area of influence nor all affected populations, including vulnerable groups or individuals such as victims of the violence generated by armed conflict, were correctly identified. This oversight later resulted in the absence of specific measures intended for them.
 - Definition of emergency areas and disaster risk management. During the ESDD and during monitoring, there was no assessment of whether the Contingency Plan included adequate identification of emergency areas and affected or potentially affected populations. The populations susceptible to being affected by emergency situations were not identified, characterized or censused.
 - Consultation processes and forms of participation. It was not ensured that the stakeholder mapping and relationship processes were meaningful and had adequate levels of depth and quality. It failed to conduct a consultation as a two-

¹⁶ Consultation Phase Assessment Report, section 4.1.

¹⁵ Compliance Review Report, p. 27.

¹⁷ Recommendation for Compliance Review and Terms of Reference, section 7.2.

¹⁸ Compliance Review Report, pp. 125-130.

way process that should be documented. It did not ensure that a gender-sensitive consultation process had been carried out.

- Gender-differentiated impacts. It did not ensure that there was an analysis of the
 relevance of gender issues in the preparation of the operation, nor did it ensure the
 incorporation of specific actions to address priority issues and measures to
 facilitate their implementation.
- Social impact and migratory pressure. No data analysis was found to determine
 the effectiveness of the mitigation measures, nor an assessment of criteria to be
 taken into account to design actions based on the results of the monitoring
 processes in each of the indicators.
- Involuntary resettlement process. It did not verify the existence of an initial
 census or an up-to-date baseline at the time of its involvement in the Project, which
 was 10 years after the original census had been conducted. By that time, the
 physical resettlement was about to be completed, but the economic displacement
 had not yet concluded.
- Conflict, security and violence. It did not identify risk factors and security impacts
 to potentially affected communities, nor did it ensure that risks arising from the
 existence of government security personnel mobilized to provide security services
 to the Project were assessed and documented.
- Biodiversity, natural habitats, ecosystem services and water flows. At the
 time of its exit from the Project, the obligation to implement a metric framework to
 evaluate conservation results had not been fulfilled. In terms of ecosystem
 services, it was not ensured that the identification and proposal of measures to
 manage the impacts on these services were complied with, following the logic of
 the mitigation hierarchy.
- Cumulative impacts. Failed to ensure that the cumulative environmental and social impacts of the Project on the affected communities, especially the most vulnerable populations, had been subject to a comprehensive assessment, including socioeconomic impacts in addition to environmental impacts.
- **Supervision.** It did not verify, within its supervisory role, that the risk assessment of the Project took into consideration its maximum magnitude and risks, carrying out the supervision according to the nature and scale of the Project.
- 1.12 Based on the findings of the investigation, MICI included sixteen recommendations for consideration by the Board to address the non-compliances found in the case. The recommendations were approved by the Board of Executive Directors on October 10, 2023. The Board requested that IDB Invest develop an action plan and that MICI monitor

its implementation. This action plan was approved by the Board on June 4, 2024 and monitoring will continue for a maximum of five years from that date.¹⁹

1.13 **Summary of the process before the MICI**. Below is a figure summarizing the main milestones in the process before the MICI.

Figure 1
MICI Process



II. Policy Authority and Monitoring Process

- 2.1 This document contains the MICI monitoring plan for the Action Plan, according to section 49 of MICI's Policy (CII/MI-1-4). This section establishes that, where applicable, MICI will monitor the implementation of any action plan or corrective or remedial action agreed to be taken following a Compliance Review. To that end, it will design a Monitoring Plan tailored to the case requirements and developed in consultation with the Requesters, Management, and other relevant stakeholders, as applicable. Management will collaborate with MICI during the Monitoring process.
- 2.2 The final version of the plan, after considering the comments of the Requesters and Management, is distributed to the Board for information, notified to the Parties and published in the Public Registry of the case.
- 2.3 The Monitoring Plan is based on the recommendations included in the Compliance Review Report and the Management Action Plan approved by the Board to comply with these recommendations. The Report has three types of recommendations: a) institutional, b) one on access to information for the benefit of the requesters and c) one on support for local initiatives for the benefit of the requesters. The institutional recommendations refer to actions that IDB Invest should take according to the Compliance Review Report, particularly recommendations 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14 and 16.
- 2.4 Regarding the recommendation on access to information, it is listed as number 4 of the CRP Report, and highlights information gaps among affected individuals, and asks IDB Invest to publish all updates of environmental and social documents that may have been

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¹⁹ Management Action Plan approved by the Board of Executive Directors.

produced until its exit from the Project, as well as an easy-to-understand summary in Spanish of all technical rulings issued by the Independent Advisory Panel concerning the Project. If this cannot be done due to the confidentiality clauses of the loan agreement, a session should be held with one of the experts of the Independent Advisory Panel in which the representatives of Movimiento Ríos Vivos will be briefed, in non-technical language, about the work that was done and the conclusions the Panel reached at the time of preparation of their reports.²⁰

- 2.5 Finally, the recommendation on support for local initiatives is number 15, which in turn is broken down into 4 recommendations (15.1, 15.2, 15.3 and 15.4). As will be explained, 15.4 provides for direct participation of requesters in the design of an action.
- 2.6 Regarding the content of recommendations 15.1²¹, 15.2²² and 15.3²³, the Requesters submitted comments by e-mail dated April 26, 2024. In turn, BID Invest thanked them for the comments and responded that they would be taken into account.²⁴
- 2.7 Regarding recommendation 15.4, the Requesters have made statements over time. The recommendation sets forth:

"Joint Action. Together with the Requesters, and according to the terms of Recommendation 16 about the Action Plan, to analyze the implementation of a specific action that will last over time, to acknowledge ancestral traditions in the Cauca River Canyon in order to transmit their history and symbolism to future generations. The action must be framed within IDB Invest sustainability objectives".²⁵

2.8 This recommendation is complemented by the second section of recommendation 16, which stipulates that:

... "Since both Management and the MRV have made verbal and written statements regarding the Preliminary Report, endorsing the possibility that the process of preparing the Action Plan with regard to Recommendation 15 may include representatives of the MRV, MICI **recommends** that this participation be

²¹ Recommendation 15 of the <u>Compliance Review Report</u> sets forth the following: 15. 1.a. Design of an educational program to raise awareness on the importance of caring for the Cauca River Canyon biome using various educational strategies. The content will be published on the IDB Invest website; 15.1.b. Outreach of the program among local authorities and other relevant national and international actors from the public and private sector with presence in the project area towns.

²⁰ See Recommendation 4 of the Compliance Review Report.

²² Recommendation 15.2 of the <u>Compliance Review Report</u> sets forth the following: 15.2a. Study for productive, economic and social strengthening with a gender equity approach that seeks to identify socioeconomic options with market analysis including technical feasibility, as an alternative to gold panning and fishing activities, as well as the identification of possible forms of financing for such initiatives. The content of the study will be published on the IDB Invest website; 15.2 b. Implementation of technical workshops on the structuring of financing proposals or projects for the identified initiatives and accompaniment by IDB Invest during the structuring process.

process.

²³Recommendation 15.3 of the <u>Compliance Review Report</u> sets forth the following: 15.3. Development of technical content for workshops to raise awareness in the communities affected by the Project on the importance of women's rights and differentiated impacts; sexual and reproductive rights, with emphasis on the management of sexually transmitted diseases; and prevention of domestic violence and gender-based violence.

²⁴ E-mail response by IDB Invest on June 13, 2024.

²⁵ See Recommendation 15.4 of the Compliance Review Report.

materialized, particularly regarding the design of Recommendation 15.4. At the request of the parties, MICI will collaborate in the facilitation of the conversations they agree upon."

- 2.9 By virtue of the above, since February 2024, the Parties have been participating in a facilitation process, under the modality of good offices, in order to reach a consensus on a working methodology for the convergence of the action of recommendation 15.4. The following are the seven steps of the methodology agreed upon by the parties:
 - "Step 1: Reach agreements on the methodology. Establish a methodology agreed upon by the parties in a consensual manner.
 Step 2: Each party sends an initial draft to MICI within a maximum of 15 days after the methodology has been agreed upon.
 To prepare these initial drafts, MRV requires:
 - 2.1. A coordination meeting with 43 participants, for which funding is requested for internal travel. BID Invest has expressed openness to supporting local transportation in the area where communities are located for two coordination meetings. the 2.2. of the delegates. meeting **2.3.** A meeting of the delegates with MICI and submission of the initial draft.
 - **Step 3:** MICI sends each party the draft from the other party to begin its analysis. This is done simultaneously once both drafts are received. Avoiding the exchange of drafts is not advisable, as it raises doubts and suspicions about MICI's interpretation of both drafts, especially considering that MICI's role is not neutral and it is part of BID. **Step 4:** MICI analyzes the points of convergence and divergence between the drafts and sends its analysis to the parties within a maximum of 8 days after receiving them. **Step 5:** MICI conducts bilateral meetings with the parties to find common ground on the divergences identified in the drafts. **Step 6:** MICI coordinates the first meeting between the parties to address and resolve the differences in the drafts. **Step 7:** MICI coordinates the necessary meetings between the parties to finalize and sign the Joint Action Agreement."²⁶
- 2.10 During the monitoring process, MICI analyzes compliance with the activities established in the Action Plan, in order to ensure that these activities are carried out in compliance with the recommendations approved by the Board.
- 2.11 For the implementation of this Monitoring Plan, MICI requires the active collaboration of Management in the provision of updated documentation and information within the timeframe established in the Monitoring Plan. Likewise, it will hold periodic meetings with Management regarding the status of compliance with pending actions. When appropriate,

²⁶ This section is solely a description of the agreed methodology. Progress regarding the joint action will be carried out through the Monitoring Plan, considering the dates, indicators, and verification methods proposed in Section III of this document.

- consultants or other third parties involved in specific aspects of the Action Plan will be included in the meetings to obtain direct information from them.
- 2.12 Furthermore, MICI will maintain active communication with the Requesters to receive updated information on the issues to be monitored and as part of the verification methods for some of the actions to be carried out. Similarly, MICI emphasizes that actions involving the active participation of Requesters whether through providing input or through consultation processes, are not intended to impose such participation, as it is entirely voluntary. The primary objective is to ensure that their concerns and needs are considered and heard, guaranteeing that the implemented actions result in tangible benefits for the Requesters.
- 2.13 If deemed necessary during the monitoring process, MICI may hire independent consultants to assist in the verification of data or information regarding compliance with actions, as well as field visits to the Project site or area of influence. In accordance with MICI Policy, the Mechanism will issue annual monitoring reports. MICI will make efforts to promote the accessibility of its reports, particularly to the communities in the Antioquian municipalities of Briceño, Ituango, Toledo, San Andrés de Cuerquia, Valdivia, Sabanalarga, Peque, and Caucasia.

III. Monitoring Plan

Recommendations²⁷

Thematic axis 1: Identification of the affected and potentially affected population

Area of influence and emergency area

Recommendation 1. ESDD in high-risk projects. ... MICI recommends that IDB Invest should develop an internal guide or technical note providing further guidance to its environmental and social teams, including such elements as: (i) the existence of affected area models for worst-case scenario, (ii) emergency response plans that include a description of the populations affected by different scenarios, and (iii) a plan for the necessary coordination between different actors to implement emergency actions.

Deliverable and date

Deliverable: Internal technical note for the assessment of emergency plans.

Date: Second quarter of 2024.

Monitoring indicators and verification methods

- I.1: That an internal technical guide or note for the assessment of emergency plans be developed.
- I.2: That it be developed to address the following issues: (i) the existence of models that consider the worst-case scenario for the affected areas; (ii) emergency response plans that include a description of the affected populations in different scenarios; and (iii) a plan for the necessary coordination between the different actors to implement emergency actions.
- I.3: That it be developed by the second guarter of 2024 at the latest.
- M1: Availability of the technical note.
- M2: Verification that the technical note includes the three required topics.
- M3: Verification of the dissemination of the technical note to the environmental and social teams.
- M4: Verifying that the technical note was delivered within the required timeframe.

Recommendation 2.1. Periodically update mapping of the affected population. MICI recommends: i) that IDB Invest produce a technical note for clients and IDB Invest teams identifying good practices for stakeholder participation in the process of mapping affected groups and highlighting the importance of periodically updating the mapping of stakeholders and affected communities in the different phases of complex, large-scale, or high-risk projects.

Deliverable and date

Deliverable: Technical note for IDB Invest clients and teams on participatory stakeholder mapping, including the importance of regular updates.

Date: Second quarter of 2024.

- I.1 That a technical note be developed identifying:
- 1) Examples of good practices where stakeholders²⁸ have been involved in the mapping or identification of affected groups or communities.²⁹
- 2) Examples of good practices on the regular updating of the mapping of affected groups or actors. 30
- I.2 That it should reach IDB Invest's clients and teams.
- 1.3 That it be delivered during the second guarter of 2024.

²⁷ This column is based on the recommendations of the Compliance Review Report.

²⁸ Stakeholders are individuals or groups who have expressed support or concerns regarding proposed or existing Bank-Financed Operations. See the Environment and Safeguard Compliance Policy ('ESCP'), 2006, p.19.

²⁹ Affected Parties are individuals, groups of individuals or communities that may be directly impacted by a Bank-Financed Operation. This impact can be positive or negative. See the Environment and Safeguard Compliance Policy ('ESCP'), 2006, p.19.

³⁰ Ibid.

- M.1 Existence and availability of the technical note.
- M.2 Dissemination on the IDB Invest website of the note and in the annex of the IDB Invest Environmental and Social Sustainability Policy Implementation Manual.
- M.3 Dissemination of the note to IDB Invest teams.
- M.4 Verification that the technical note includes the three required topics.
- M.5 Verification that the technical note was delivered within the required timeframe.

Recommendation 2.2. Periodic update mapping of the affected population (...) ii) that the IDB Invest environmental and social supervision report template include a specific action to monitor updates to the mapping of the affected population within a project's area of influence and within the identified emergency area(s).

Deliverable and date

Deliverable: Model of the updated monitoring report.

Date: First quarter of 2025.

Monitoring indicators and verification methods

- I.1 That the supervision report template be updated including:
- 1) A specific action to monitor the updates that will occur in a pre-established period of the mapping of the affected population within the area of influence of the project and;
- 2) A specific action to monitor the updates of the mapping of the affected population that will occur in a pre-established period within the delimited emergency zones.
- I.2 That it be delivered during the first quarter of 2025.
- M.1 Confirmation that the supervision report template explicitly includes a monitoring action of the mapping activities of the potentially affected population within the area of influence of the Project.
- M.2 Confirmation that the supervision report template explicitly includes the follow-up of mapping activities of the potentially affected population within the delimited emergency zones.
- M.3 Confirmation that the technical teams were informed about the update of the supervision report template.
- M.4 Verification of the scheduled delivery timeframe.

Emergency areas and disaster risk management

3.1. Clarify the role and responsibilities of IDB Invest supervision in projects with government intervention in case of emergency......MICI recommends that: 3.1 The institution issue a technical note clarifying the supervisory role and responsibilities of IDB Invest where government agencies are involved in the disaster risk management.

Deliverable and date

Deliverable: Internal technical note addressing IDB Invest's roles and responsibilities during emergencies.

Date: Third quarter of 2024.

Monitoring indicators and verification methods

- I.1 That a technical note be developed on IDB Invest's supervision role and responsibilities in emergency management, when government agencies in the region are involved in the management.
- I.2 That it be delivered during the third quarter of 2024.
- M.1 Confirmation of the existence and availability of the technical note.
- M.2 Verifying that the technical note includes the required content.
- M.3 Verifying that the note was brought to the attention of the technical teams.
- M.4 Verification of the scheduled delivery timeframe.
- **3.2 Clarify the role and responsibilities of IDB Invest supervision in projects with government intervention in case of emergency...........3.2** Develop the general guidelines of PS4 on how clients should act in emergency situations in which government agencies intervene.

Deliverable and date

Deliverable: New general guidelines in the Environmental and Social Sustainability Policy Implementation Manual for PS4 – the role of the client during emergencies. Date: Third quarter of 2024.

- I.1 That new guidelines be developed related to the content of the Environmental and Social Sustainability Policy Implementation Manual for PS4 on the role of the client in emergency situations involving government agencies.
- I.2 That they be delivered during the third guarter of 2024.
- M.1 Confirmation of the existence of the new general guidelines concerning the role of the client during emergencies.

M.2 Verification of the dissemination of the guidelines to IDB Invest teams and clients through the IDB Invest website and in the annex of the IDB Invest Environmental and Social Sustainability Policy Implementation Manual.

M.3 Verification of the scheduled delivery timeframe.

Community consultation and participation process

- 4. Address information gaps experienced by the affected persons... it is therefore recommended that IDB Invest publicly disclose the following:
- (a) All updates to the environmental and social documents that have been produced up to the time of IDB Invest's exit from the Project.
- (b) An easy-to-understand summary, in Spanish, of all the technical opinions rendered by the Independent Advisory Panel on the status of the Project, its potential risks, and actions to address them, in relation to the downstream population, after the contingency, which are currently published on the institution's website and of any others rendered by the panel that have not been published. If the actions provided for in (a) and (b) above cannot be carried out due to contractual restrictions, IDB Invest should organize a meeting with one of the experts of the Independent Advisory Panel to explain to the representatives of Movimiento Rios Vivos, in non-technical language, the Panel's work and the conclusions it reached as of the date of its reports.

Deliverable and date

Deliverable: a) Publication of relevant updated environmental and social information in accordance with the Information Disclosure Policy in force at the time of approval of the project; b) Publication of the technical opinions issued by the Independent Advisory Panel on the status of the Project, translated into Spanish; c) Virtual meeting with IDB Invest Panel's expert leader and the Complainants' Representatives to explain the Panel's work and main findings.

Date: Third quarter of 2024.

Monitoring indicators and verification methods

- I.1 That all updates to environmental and social documents generated up to the time of exit from the project be published, in accordance with the Information Disclosure Policy. I.2 That the technical opinions issued by the Independent Advisory Panel on the status of the Project be published in a Spanish translation.
- I.3 To prove that efforts have been made to hold a virtual meeting with the Independent Advisory Panel's expert leader and MRV representatives to explain, in non-technical language, the Panel's work and its main findings. To this end, it must:
 - Schedule the appropriate date with MRV.
 - · Provide an agenda for the meeting.
 - Draft minutes of the meeting.
 - Prepare a list of attendees.
- 1.4 That it be delivered during the third guarter of 2024, unless an extension is necessary for good cause related to coordination between the parties.
- M.1 Confirmation of the publication of updates to the environmental and social documents on the project website.
- M.2 Verification of the publication of the technical reports of the Independent Advisory Panel translated into Spanish on the project website.
- M.3 Verification of the holding or good faith efforts to hold a virtual explanatory meeting on the work carried out by the International Accountability Project ("IAP").
- M.4 Verification of the scheduled delivery timeframe.
- **5.1 Information and consultation process on security risk management measures.** MICI recommends: i) preparing a technical note for clients in projects classified by IDB Invest as having high contextual risk, located in areas of heightened conflict, violence, and insecurity, to help them identify and manage security and contextual risks, with an emphasis on stakeholder participation, particularly that of the affected and most vulnerable communities.

Deliverable and date

Deliverable: Technical note for clients on security and contextual risk management issues including content regarding stakeholder participation.

Date: Fourth quarter of 2024.

- I.1 That a technical note be prepared for clients including: (i) Definition and characterizations of elements present in high contextual risk scenarios, (ii) elements and good practices to identify and manage contextual and security risks, emphasizing the participation of stakeholders, especially, affected and vulnerable communities³¹.
- I.2 That it be delivered during the fourth quarter of 2024.

³¹ According to <u>PS1</u> the condition of vulnerability may derive from race, color, sex, language, religion, political or other opinion, national or social origin, property, place of birth or another characteristic of an individual or group. The client must also consider factors such as gender, age, ethnicity, culture, literacy level, illness, physical or mental disability, poverty or economic deprivation, and dependence on unique natural resources.

- M.1 Confirmation of the existence of the technical note.
- M.2 Verification that the technical note includes the required content.
- M.3 Verification of the scheduled delivery timeframe.
- **5.2.** Information and consultation process on security risk management measures.... (ii) providing training to clients on topics included in the above technical note.

Deliverable and date

Deliverable: Recorded training on the content of the technical note permanently accessible to all clients.

Date: Fourth quarter of 2024.

Monitoring indicators and verification methods

- I.1 That a training on the content of the technical note be recorded.
- I.2 That it be permanently available to IDB Invest's clients, especially those considered high contextual risk.
- I.3 That a client training be carried out for the clients in 2024.
- M.1 Verification of the existence of a video about the content of the technical note.
- M.2 Verification of availability of the video to IDB Invest clients.
- M.3 Verification of the scheduled delivery timeframe.
- **5.3 Information and consultation process on security risk management measures**... (iii) including a specific action in the IDB Invest environmental and social supervision report template to monitor stakeholder participation activities, particularly those involving the affected and most vulnerable communities, in the safety management plan.

Deliverable and date

Deliverable: Updated supervision report template.

Date: First quarter of 2025.

Monitoring indicators and verification methods

- I.1 That the supervision report template be updated with a component on monitoring stakeholder participation activities particularly those of affected and most vulnerable communities as part of the security management plan.
- I.2 That it be delivered during the first quarter of 2025.
- M.1 Confirmation of the update of the supervision report template.
- M.2 Verification that the model includes mechanisms for monitoring stakeholder participation activities in the security management plan.
- M.3 Verification of the scheduled delivery timeframe.

Thematic axis 2: Assessment of socio-environmental risks and impacts and their management measures

Involuntary resettlement process

6.1 Resettlement plan update and consideration of external audit upon completion...MICI therefore recommends that: (i) IDB Invest prepare an internal note or guide for its environmental and social specialists that includes the necessary elements to consider in the implementation of a resettlement plan, such as (a) the best forms of dialogue with the affected communities and feedback actions for those communities during the resettlement process, (b) a review of the mitigation measures implemented by the client when project construction has already begun by the time the Bank becomes involved in the financing, (c) a review of the potential need to update the census and resettlement plan when some time has elapsed between census-taking and implementation of the resettlement plan...

Deliverable and date

Deliverable: A technical note on the necessary elements of a resettlement plan.

Date: Third quarter of 2024.

Monitoring indicators and verification methods

- I.1 That an internal note or guide be developed on the necessary elements to be considered in the implementation of a resettlement plan and that it include at least: (a) the best forms of dialogue with the affected communities and the feedback actions of those communities during the resettlement process, (b) a review of the mitigation measures implemented by the client when it is a project whose construction, at the time the institution becomes involved in the financing, has already started, (c) a review of the appropriateness of updating the census and the resettlement plan when some time has elapsed between the performance of the census and the implementation of the resettlement plan.
- 1.2 That its environmental and social specialists be made aware of it.
- 1.3 That the delivery occurs during the third quarter of 2024, within the Expected Timeframe.
- M.1 Verifying the existence of the technical note.
- M.2 Verifying that the note includes the required content.
- M.3 Verifying that the environmental and social specialists were notified of the existence of the note.
- M.4 Verifying that the note is made available to the social and environmental specialists.
- M.5 Verification of the scheduled delivery timeframe.
- **6.2 Resettlement plan update and consideration of external audit upon completion.....**6.2 (d) orientation guidelines for its environmental and social specialists and its clients on external audits in involuntary resettlement processes.

Deliverable and date

Deliverable: Guidelines for specialists and clients on external audits of resettlement plans.

Date: Third quarter of 2024.

Monitoring indicators and verification methods

- I.1 That guidelines be developed for environmental and social specialists and clients regarding external audits of resettlement plans.
- I.2 That the guidelines be made known to environmental and social specialists as well as clients.
- I.3 That the delivery take place during the third quarter of 2024.
- M.1 Verification of the existence of the Guidelines.
- M.2 Verification that the Guidelines were made known to environmental and social specialists as well as clients.
- M.3 Verification of the scheduled delivery timeframe.
- **6.3 Resettlement plan update and consideration of external audit upon completion...** ii) a specific action for monitoring and updating the resettlement plan be included in IDB Invest's environmental and social supervision model, as outlined above.

Deliverable and date

Deliverable: Updated supervision report template.

Date: First quarter of 2025.

Monitoring indicators and verification methods

- I.1 That the supervision report template be updated to include a component on monitoring and updating the resettlement plan.
- 1.2 That the technical teams be notified of the update of the supervision report with the monitoring component of the resettlement plan.
- 1.3 That the delivery take place during the first guarter of 2025.
- M.1 Verifying that the supervision report template includes a component for monitoring and updating the resettlement plan.
- M.2 Verifying that the technical teams have been notified of the template update.
- M.3 Verification of the scheduled delivery timeframe.

Conflict, security and violence

7.1 Thorough analysis of participation in a project located in fragile areas with a history of conflict. (i) institutionalize the aforementioned practices for carrying out a contextual analysis as the beginning of the ESDD process and before conducting field visits in an internal orientation tool (e.g., an internal guide or through the update of the Procedures Manual) for its environmental and social specialists;

Deliverable and date

Deliverable: Internal technical note on contextual risk analysis, including retaliation and violence content, to be used as part of the environmental and social impact assessment during the due diligence process.

Date: First quarter of 2025.

Monitoring indicators and verification methods

- I.1 That a technical note on contextual risk analysis be developed that includes content on retaliation and violence, to be used as part of the environmental and social impact assessment during the due diligence process.
- I.2 That it be made known to the technical teams.
- I.3 That the delivery take place during the first guarter of 2025.
- M.1 Verification of the existence of the technical note regarding contextual risk analysis includes the required content.
- M.2 Verification that the note was made known to the technical teams.
- M.3 Verification of the scheduled delivery timeframe.
- 7.2 Thorough analysis of participation in a project located in fragile areas with a history of conflict. ii) develop a guidance note for its clients on conflict, security, and violence, describing the importance of, and tools for, conducting a comprehensive analysis of these issues for projects located in fragile areas with a history of conflict, violence and insecurity. Both instruments should consider the analysis of at least the following factors: (1) the context of violence and security in which the project is developed and the geographic area in which it is located, (2) the project's potential interactions with the context of violence and conflict with the communities, (3) the potential risk of reprisals against project opponents, and (4) possible management measures of impacts, including strengthening relationships with stakeholders.

Deliverable and date

Deliverable: Guidance for clients with contextual risk content including content on (1) the violence and security context in which the project is involved, (2) potential interaction between the project and the context of violence and conflict, as well as the communities, (3) the potential risk of retaliation against project opponents, and (4) potential impact management measures, including strengthening stakeholder engagement.

Date: First quarter of 2025.

Monitoring indicators and verification methods

- I.1 That guidelines for clients be developed concerning conflict, security and violence, describing the importance and tools to carry out a comprehensive analysis of these issues for projects located in vulnerable areas with a history of conflict, violence and insecurity, including at least the following aspects:
- 1) The context of violence and security in which the project is developed and the geographic area in which it is located,
- 2) Potential interactions between the project and the context of violence and conflict, as well as the communities.
- 3) The potential risk of retaliation against project opponents, and
- 4) Potential impact management measures, including strengthening engagement with different stakeholders.
- I.2 That it be made known to the clients.
- I.3 That the delivery take place during the first guarter of 2025.
- M.1 Verification of the existence of the guidelines for clients regarding conflict, security and violence.
- M.2 Verification that the guidelines include the required components.
- M.3 Verification that the guidelines have been made known to clients through the IDB Invest website and included in the annex of the IDB Invest Environmental and Social Sustainability Policy Implementation Manual.
- M.4 Verification of the scheduled delivery timeframe.
- 7.3 Thorough analysis of participation in a project located in fragile areas with a history of conflict. (iii) Incorporate in its environmental and social supervision report template an action to monitor the client's management of measures to address risk of conflict and violence.

Deliverable and date

Deliverable: Format of the updated supervision report.

Date: First quarter of 2025.

- I.1 That the environmental and social supervision report template be updated to include an action to monitor the client's management of measures to address risks of conflict and violence.
- I.2 That the IDB Invest environmental and social technical team be notified of the update.
- I.3 That the delivery take place during the first quarter of 2025.
- M.1 Verification that the environmental and social supervision report template includes the required action.
- M.2 Verification that the update has been notified to the social and environmental technical team.
- M.3 Verification of the scheduled delivery timeframe.

8.1. Zero tolerance against reprisals. ... MICI recommends that IDB Invest: (i) documents in project ESRSs what are the documents from its clients reviewed during its ESDD that reflect their commitment to human rights and zero tolerance for reprisals.

Deliverable and date

Deliverable: Update the template of the Environmental and Social Review Summary ("ESRS").

Date: Third quarter of 2024.

Monitoring indicators and verification methods

- I.1 That the Environmental and Social Review Summary (ESRS) template be updated to include a section on documents reviewed during the ESDD related to the client's commitments on human rights and zero-tolerance against reprisals.
- I.2 That the IDB Invest environmental and social technical team be notified of the update.
- I.3 That the delivery take place during the third guarter of 2024.
- M.1 Verification of the ESRS model update with the required content.
- M.2 Verification of the scheduled delivery timeframe.
- 8.2 Zero tolerance against reprisals... (ii) provide training and guidance to its clients on this topic throughout project implementation.

Deliverable and date

Deliverable: Audiovisual anti-reprisal training permanently accessible to all clients.

Date: First quarter of 2025.

Monitoring indicators and verification methods

- I.1 That audiovisual anti-reprisal training be developed.
- I.2 That training be permanently accessible to all clients.
- 1.3 Verification that the audiovisual training has been shared during the first quarter of 2025.
- M.1 Verification of the existence of audiovisual training against reprisals.
- M.2 Verification that training material is permanently accessible to all clients.
- M.3 Verification of the scheduled delivery timeframe.
- 8.3 Zero tolerance against reprisals...(iii) include in its environmental and social supervision report template an action to supervise the client's actions with regard to risk of reprisals.

Deliverable and date

Deliverable: Updated supervision report template.

Date: First quarter of 2025.

Monitoring indicators and verification methods

- I.1 That the supervision report template be updated to include an action to supervise the client's measures regarding the risk of reprisals.
- I.2 That the IDB Invest environmental and social technical teams be informed of said update.
- I.3 That the delivery take place during the first quarter of 2025.
- M.1 Verification that the update of the supervision report template includes a specific action to supervise the risk of reprisals.
- M.2 Verification that the update was communicated to the environmental and social teams.
- M.3 Verification of the scheduled delivery timeframe.
- 9. Link to IDB Invest instruments on reprisals. Consequently, MICI recommends that the website of every project in which IDB Invest is involved include a link to all such instruments on reprisals in force, both for IDB Invest and MICI. This does not preclude IDB Invest's ability to add links to other environmental and social commitments, such as zero tolerance for gender-based violence.

Deliverable and date

Deliverable: A change in the format (banner) of the IDB Invest project publication webpage.

Date: Second quarter of 2024.

- I.1 That the format of the IDB Invest web page be changed and that the link to the reprisal instruments in effect for both IDB Invest and MICI be included in the site of each project.
- I.2 That the delivery take place during the second half of 2024.
- M.1 To confirm that IDB Invest website for each ongoing project includes a direct link to the latest reprisal instruments.
- M.2 Verification of the scheduled delivery timeframe.

10. Strengthening IDB Invest's internal capacities to manage projects in fragile and violence-affected areas. MICI recommends that the institution strengthen internal capacities to ensure compliance with security and human rights standards and to manage projects in fragile areas affected by conflict and violence. It is recommended that this strengthening should be carried out through periodic training in security and human rights, community security, conflict prevention and management, and/or the hiring of specialists or experts in security and human rights.

Deliverable and date

Deliverable: Training including content on human rights and security, conflict management and prevention in vulnerable regions affected by conflict and violence for existing environmental and social teams and including the content in onboarding training for new environmental and social officers.

Date: Second guarter of 2025.

Monitoring indicators and verification methods

- I.1 That training on security and human rights, conflict prevention and management in vulnerable regions affected by conflict and violence be developed for environmental and social teams.
- I.2 That training be held regularly, with the first training taking place during the second half of 2025.
- I.3 That the training content be part of the onboarding for new environmental and social officers.
- I.4 If necessary, that security and human rights experts be hired when developing projects in vulnerable areas affected by violence.
- M.1 Verification that regular training has been developed to strengthen IDB Invest's internal capacities in the topics indicated in the recommendation.
- M.2 Verification of the scheduled delivery timeframe.
- M.3 Verification that onboarding for new environmental and social officers includes training on this area.
- M.4 Verification of the hiring of security and human rights experts in projects developed in vulnerable areas affected by violence.
- 11.1 Update of security agreements and incident reporting information. MICI therefore recommends that: (i) a monitoring action on the updating of security agreements, security-related incidents, and description of incident management measures be included as part of IDB Invest's environmental and social supervision model.

Deliverable and date

Deliverable: Updated supervision report template.

Date: First quarter of 2025.

Monitoring indicators and verification methods

- I.1 That the supervision report template be updated to include a monitoring action on the updating of security agreements, security-related incidents and description of incident management measures.
- I.2 That the delivery take place during the first quarter of 2025.
- M.1 Verification that the supervision report template includes the required action.
- M.2. Verification that the existence of the new supervision report template was communicated to the technical teams.
- M.3 Verification of the scheduled delivery timeframe.
- 11.2 Update of security agreements and incident reporting information. (ii) a section in the template of the report required of clients (ICAS or ESCR or its equivalent) include a section in which clients report updates on: (1) substantial changes in security contracts or agreements (public or private); (2) acts of project-related violence that have occurred; and (3) reprisals or threats against its workers or the community.

Deliverable and date

Deliverable: Updated format of the required client report (ESCR).

Date: Fourth quarter of 2024.

Monitoring indicators and verification methods

- I.1 That the format of the ESCR report required from the clients be updated to include a section for clients to report updates on (1) substantial changes to security contracts or agreements (public or private); (2) acts of violence that have occurred and are related to the project; and (3) reprisals or threats against the community and its workers.
- I.2 That the update take place during the fourth quarter of 2024.
- M.1 Verification that the ESCR format includes the required sections.
- M.2 Verification of the scheduled delivery timeframe.

Biodiversity, natural habitats, ecosystem services and water flows

12. Technical note on metrics for measuring biodiversity offset outcomes....it is recommended that IDB Invest produce a guidance instrument (e.g., a technical note or guide) that would allow its clients to include an effective form of measurement in their projects. These forms of measurement may be existing measurement tools that clients can use for these purposes.

Deliverable and date

Deliverable: Technical note on assessment of biodiversity offsets including content on performance assessment.

Date: First quarter of 2025.

Monitoring indicators and verification methods

- I.1 That a technical note be developed on biodiversity offsets assessment including content on performance assessment for use by its clients.
- I.2 That it be made known to the clients.
- I.3 That the development take place during the first quarter of 2025, within the Expected Timeframe.
- M.1 Verification of the existence of the technical note.
- M.2 Verification that the technical note contains the required assessment parameters.
- M.3 Verification that clients have access to the technical note, through the IDB Invest website and in the annex to the IDB Invest Environmental and Social Sustainability Policy Implementation Manual.
- M.4 Verification of the scheduled delivery timeframe.

General recommendations

Scope of supervision

13. Develop the concept of mitigation measures and their effectiveness... recommends that this concept (mitigation measures and their effectiveness) be developed though the adoption of a guidance instrument on the new sustainability framework, and that the topic of measuring the effectiveness of mitigation measures in general, and for "migratory pressure" and "security" in particular, be included in the training programs for IDB Invest's environmental and social teams.

Deliverable and date

Deliverable: a) In-house guidance for biodiversity offset assessment, b) In-house training for environmental and social officers on the effectiveness of mitigation measures and on mitigation measures for "migratory pressure" and security.

Date: First quarter of 2025.

Monitoring indicators and verification methods

- I.1 That an internal guide be developed for the assessment of biodiversity offsets.
- 1.2 That the internal guide be developed during the first guarter of 2025.
- 1.3 That training be conducted on assessing the effectiveness of mitigation measures in general, and specifically on migratory pressure and security for IDB Invest's environmental and social teams.
- 1.4 That the training be carried out during the first guarter of 2025.
- M.1 Verification of the existence of the internal guide for the assessment of biodiversity offsets.
- M.2 Verification that the internal guide is delivered during the first guarter of 2025.
- M.3 Verification that training has been provided to IDB Invest's environmental and social teams on the assessment of the effectiveness of management measures associated with migratory pressure and security.
- M.4 Verification that training was provided during the first guarter of 2025.

Development of an instrument for exiting projects responsibly

- 14. Develop an instrument for exiting projects responsibly....MICI recommends to IDB Invest that the framework being formulated be discussed with MICI and OVE prior to consultation with the Board of Executive Directors. In addition, MICI recommends that the framework require IDB Invest to consider the following:
 - (1) Depending on the nature of the operation, contractual or other approaches to implement the framework principles.
 - (2) Before exit, issues or considerations related to the management of environmental and social impacts that are pending management and are in the process of complying with the Project's environmental and social standards, and that had already been identified by the client, in the supervision process, or by Management in its own monitoring;
 - (3) Before exit, issues or considerations related to environmental and social impacts that were part of a Request or Complaint filed by communities, that feel affected by a Project, with the project-level grievance mechanism, the Management Grievance Mechanism, or MICI, and that are at any stage of the MICI process, including the monitoring status of any MICI phase:
 - (4) Where appropriate, the design of actions and measures to address the issues identified, as described in paragraphs (2) and (3) above.

Deliverable and date

Deliverable: Responsible Exit conceptual framework developed. The process will include discussions with other multilateral organizations and dialogue with MICI and OVE. Date: Fourth guarter of 2024.

Monitoring indicators and verification methods

- I.1 That a Responsible Exit conceptual framework be developed and discussed with MICI and OVE prior to presentation to the Board of Directors.
- 1.2 That said framework includes the guiding principles of the responsible exit process.
- I.3 That the framework be tested for a period of at least 24 months.
- 1.4 After 24 months, to develop the necessary measures to adjust the principles or conceptual framework and make them operational in discussion with MICI.
- 1.5 That the delivery of the framework occurs during the fourth guarter of 2024.
- M.1 Verification of the existence of the responsible exit framework.
- M.2. Verification of the scheduled delivery timeframe.
- M.3. Verification that the process of developing the responsible exit framework has included discussions with other multilateral organizations, MICI and OVE.
- M.4 Verification of the feedback received after the trial period of at least 24 months.
- M.5 Verification of the measures proposed for operationalization.

Support for local initiatives

Recommendation 15. MICI recommends that IDB Invest support the following projects or programs, which should include a cross integrated gender perspective, for the benefit of the Requesters belonging to the communities in Briceño, Ituango, Toledo, San Andrés de Cuerquia, Valdivia, Sabanalarga, Peque and Caucasia, Antioquean municipalities, represented by the MRV.

15.1 a. Biodiversity, habitats, ecosystem services, and water flows. 15.1. a. Design an educational program with various pedagogical strategies to raise awareness about the importance of caring for the Cauca River canyon biome. The content will be published on IDB Invest's website.

Deliverable and date

Deliverable 1. To create content for an educational program on the protection of the Cauca River biome in different formats (video, audio and written report) with a gender perspective. This program will be designed with input from³² representatives of the communities of Briceño, Ituango, Toledo, San Andrés de Cuerquia, Valdivia, Sabanalarga, Peque and Caucasia who are complainants in the case before MICI.

Deliverable 2. To promote the program on the IDB Invest website. Additionally, MICI will assess whether IDB Invest has explored actions and made efforts to enhance the accessibility of the report, particularly for the specified communities, beyond publishing it on the website.

Date 1. Between the first and the third guarters of 2025.

Date 2. Fourth quarter of 2025.

Monitoring indicators and verification methods

- I.1 That an educational program to creative a positive impact on the protection of the Cauca River biome be designed in different formats, with a gender perspective.
- I.2 That the program design include input from representatives of the communities of Briceño, Ituango, Toledo, San Andrés de Cuerquia, Valdivia, Sabanalarga, Peque and Caucasia who are complainants in the case before MICI.
- 1.3 That the program be published on the IDB Invest website. Additionally, MICI will assess whether IDB Invest has explored actions and made efforts to enhance the accessibility of the report, particularly for the specified communities, beyond publishing it on the website.
- 1.4 That the program be designed between the first to third quarter of 2025 and published on the IDB Invest website in the fourth quarter of 2025.
- M.1 Verification of the existence of the educational program.
- M.2 Verification that inputs from representatives from the communities of Briceño, Ituango, Toledo, San Andrés de Cuerquia, Valdivia, Sabanalarga, Peque and Caucasia, who are complainants in the case before MICI, were collected during the program development process.
- M.3 Verification of the scheduled delivery timeframe.
- **15.1 b. Biodiversity, habitats, ecosystem services, and water flows.** Disseminate the program towards local authorities and other relevant national and international stakeholders from the public and private sector with a presence in the municipalities of the Project area.

Deliverable and date

Deliverable 1. Two meetings with public authorities, one meeting with representatives of the private sector and

Deliverable 2. One meeting with representatives of the Complainants in the Project area to present the educational program.

Date. Fourth quarter of 2025.

³² For the program's design, IDB Invest will listen to the representatives of these communities to determine what is needed to raise awareness about the importance of preserving the Cauca River Canyon biome. IDB Invest will not use inputs or knowledge provided by claimants without first obtaining their prior authorization.

Monitoring indicators and verification methods

- I.1 That two meetings be held with public authorities and one meeting with representatives of the private sector to disseminate the educational program to raise awareness on the care of the Cauca River Canyon.
- I.2 That a meeting be held with complainants from the communities of the Antioquian towns of Briceño, Ituango, Toledo, San Andrés de Cuerquia, Valdivia, Sabanalarga, Peque and Caucasia, to present and disseminate the educational program to raise awareness on the care of the Cauca River Canyon.
- 1.3 That the meetings be held during the fourth guarter of 2025.
- M.1 Confirmation that the two meetings with public authorities and one meeting with representatives of the private sector to present the educational program for the care of the Cauca River Canvon were held.
- M.2 Confirmation that the meeting with complainants from the communities of Briceño, Ituango, Toledo, San Andrés de Cuerquia, Valdivia, Sabanalarga, Peque and Caucasia, as well as local authorities to present the educational program for the care of the Cauca River canyon was held.
- M.3 Confirmation that the meetings were held on schedule.

Biodiversity, habitats, ecosystem services and water flows

15.2 a. Biodiversity, habitats, ecosystem services, and water flows. Study for productive, economic and social strengthening with a gender equity approach, seeking to identify socioeconomic options, along with market analysis including its technical feasibility, as an alternative to gold panning and fishing activities, as well as the identification of possible financing alternatives for such initiatives. The content of the study will be published on the IDB Invest website.

Deliverable and date

Deliverable 1. Meetings with people who used to be engaged in gold panning and fishing to gather opinions and input, from a comprehensive gender perspective. The meetings will include representatives from the communities of Briceño, Ituango, Toledo, San Andrés de Cuerquia, Valdivia, Sabanalarga, Peque and Caucasia that are complainants in the case before MICI, and other communities in the region.

Date 1. First and second quarter of 2025.

Deliverable 2. Study on the socioeconomic potential and needs of the region of Briceño, Ituango, Toledo, San Andrés de Cuerquia, Valdivia, Sabanalarga, Peque and Caucasia, as well as market analysis and technical barriers for the development of companies and cooperatives at scale, conducted with a gender equity approach. Date 2. Third quarter of 2025.

Deliverable 3. List of institutions that could finance/support the development of small businesses and cooperatives. Date 3. Third quarter of 2025.

Deliverable 4. Promoting the study on the IDB Invest website. Additionally, MICI will assess whether IDB Invest has explored actions and made efforts to enhance the accessibility of the study, particularly for the specified communities, beyond publishing it on the website.

Date 4. Fourth quarter of 2025.

- I.1 That meetings be held with people who used to be engaged in gold panning and fishing to gather opinions and input, from a comprehensive gender perspective. The meetings will include representatives from the communities in the region of Briceño, Ituango, Toledo, San Andrés de Cuerquia, Valdivia, Sabanalarga, Peque and Caucasia that are complainants in the case before MICI.
- 1.2 That the meetings be held during the first and second guarters of 2025.
- I.3 That a study be conducted on the socioeconomic potential and needs of the region, including a market analysis and technical barriers to the development of companies and cooperatives at scale.
- I.4 That the study be delivered during the third quarter of 2025.
- 1.5 That a list of institutions that could finance or support the development of small businesses and cooperatives be drawn up.
- I.6 That said list be delivered in the third guarter of 2025.
- I.7. That the study be published on the IDB Invest website during the fourth quarter of 2025.
- M.1 Verification of meetings with people who used to be engaged in gold panning and fishing, including representatives of the communities of Briceño, Ituango, Toledo, San Andrés de Cuerquia, Valdivia, Sabanalarga, Peque and Caucasia who are complainants in the case before MICI.
- M.2 Verifying that the meetings have been held within the scheduled timeframe.
- M.3 Verification of the existence of a study on the socioeconomic potential and needs of the region, including an analysis of market and technical barriers to the development of enterprises and cooperatives at scale.

- M.4 Verification of the date on which the study was available.
- M.5 Verification of the existence of a list of institutions that could finance or support the development of small businesses or cooperatives.
- M.6 Verifying that the list was available within the established timeframe.
- M.7 Confirmation that the publication of the study was carried out within the established timeframe. Additionally, MICI will assess whether IDB Invest has explored actions and made efforts to enhance the accessibility of the study, particularly for the specified communities, beyond publishing it on the website.
- **15.2 b. Biodiversity, habitats, ecosystem services, and water flows.** Implementation of technical workshops to structure proposals or project financing for the identified initiatives and support from IDB Invest in the structuring process.

Deliverable and date

Deliverable 1. To introduce the Complainants' representatives to two entities that can potentially fund proposals.

Deliverable 2. To develop and implement a workshop in Medellin for Complainant representatives on how to structure a proposal to apply for funding. If necessary, the importance of conducting a second workshop will be considered.

Deliverable 3. To provide logistical support to a group of no more than ten representatives of the Complainants to participate in the workshop in Medellín.

- Date 1. First quarter of 2026.
- Date 2. Second quarter of 2026.
- Date 3. Second quarter of 2026.

Monitoring indicators and verification methods

- I.1 That two entities that can potentially fund proposals be presented to complainants.
- 1.2 That the presentation with entities take place during the second half of 2026.
- 1.3 That at least one workshop be held in Medellín for representatives of complainants on how to structure a proposal to apply for funding.
- I.4 That logistical support be offered to a group of at least 10 complainants to participate in the workshop in Medellín. The inclusion of additional representatives from associations linked to MRV will be considered.
- I.5 That the workshop take place during the first quarter of 2026.
- M.1 Verification of the presentation to complainants with at least two entities that can potentially fund proposals.
- M.2. Verification of the scheduled delivery timeframe.
- M.3 Verifying that at least one workshop was held in Medellín on how to structure financing proposals.
- M.4 Verifying that logistical support has been offered to at least 10 complainants.
- M.5 Confirmation that the workshop took place on schedule.

Gender-differentiated impacts

15.3 Gender-differentiated impacts. Develop the technical note for workshops to raise awareness within the communities affected by the Project on the importance of women's rights and differentiated impacts; sexual and reproductive rights, with emphasis on the management of sexually transmitted diseases; and prevention of domestic violence and gender-based violence.

Deliverable and date

Deliverable 1. Technical materials on women's rights, prevention of sexually transmitted diseases (STDs), domestic violence and gender-based violence, and mapping of local and national support services for women who have suffered gender-based violence. The technical content will include input from representatives from the region of Briceño, Ituango, Toledo, San Andrés de Cuerquia, Valdivia, Sabanalarga, Peque and Caucasia who are complainants in the case before MICI.

Deliverable 2. Dissemination of content on the IDB Invest website. Additionally, MICI will assess whether IDB Invest has explored actions and made efforts to enhance the accessibility of the report, particularly for the specified communities, beyond publishing it on the website. Date. First guarter of 2025.

- I.1 That technical materials be developed for workshops to raise awareness in the communities affected by the project, on the importance of women's rights, differentiated impacts, sexual and reproductive rights with emphasis on the management and prevention of sexually transmitted diseases and prevention of domestic and gender-based violence.
- I.2 That the technical materials include input from complainants and representatives of communities in the region, if submitted.
- I.3 That the materials be disclosed on the IDB Invest website. Additionally, MICI will assess whether IDB Invest has explored actions and made efforts to enhance the accessibility of the report, particularly for the specified communities, beyond publishing it on the website.
- I.4 That these activities take place in the first guarter of 2025.

- M.1 Verification of the existence of technical materials and that they address the minimum required contents.
- M.2 Verifying that the technical content includes input from complainants and representatives of communities in the region, if submitted.
- M.3 Verifying that technical materials are available on the IDB Invest website. Additionally, MICI will assess whether IDB Invest has explored actions and made efforts to enhance the accessibility of the report, particularly for the specified communities, beyond publishing it on the website.
- M.4 Verification of the scheduled delivery timeframe.

Joint action

15.4. Joint Action. Analyze the development of one concrete action with lasting impact in conjunction with the Requesters, in line with the terms specified in Recommendation 16 of the Action Plan, to acknowledge the ancestral traditions in the Cauca River Canyon to pass on their history and symbolism to future generations. The action must be framed within the sustainability objectives of IDB Invest.

Deliverable and date

Deliverable 1. Once the Action Plan has been approved, for the period established therein, and consistently with the methodology agreed upon by the parties, to participate in periodic meetings with the Complainants, with the support of a facilitator hired by MICI, to initiate preliminary discussions on an activity that recognizes the ancestral traditions in the Cauca River Canyon in accordance with IDB Invest sustainable development objectives.³³

Date 1. Second to third quarter of 2024.

Deliverable 2. If an agreement is reached between IDB Invest and the Complainants, IDB Invest will prepare a schedule to implement an activity that recognizes ancestral traditions in the Cauca River Canyon in accordance with IDB Invest sustainable development objectives, Management will propose a schedule for implementation of the activity and will report quarterly to MICI on the progress of the activities.

Date 2. Two months after reaching an agreement.

Deliverable 3. To implement an activity that recognizes ancestral traditions in the Cauca River Canyon, in accordance with IDB Invest sustainable development objectives. Date 3. Timeline consistent with the Action Plan and the agreed-upon methodology. For the verification of compliance with this deadline, MICI will consider the nature and complexity of the agreed action, as well as the reasonable timeframe required for its implementation.

Monitoring indicators and verification methods

- I.1 That, after approval of the action plan, and for the period established in the Action Plan and the agreed-upon methodology, the necessary meetings be held for both Parties to make a proposal for concrete action to acknowledge ancestral traditions in the Cauca River Canyon. For the verification of compliance with deliverables and indicators, MICI will take into account the methodology agreed upon by the parties.
- I.2 That IDB Invest has requested an extension of the timeframe in the face of initial delays while both Parties make efforts to be prepared to make a concrete proposal for action.
- I.3 In the event of a negotiation between the parties, IDB Invest will present a schedule for implementing the activity.
- I.4 That the implementation of the activity be completed on schedule. MICI will assess the need to extend the implementation and monitoring timeline of the agreed action, considering its nature and complexity.

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- M.1 Verification of the holding of the corresponding meetings.
- M.2 Verification of a request for an extension of the timeframe, if necessary to allow the Parties to develop their proposal for a joint action.
- M.3 If an agreement is reached, verifying that IDB Invest submitted a schedule of activities to MICI two months after the agreement was reached.
- M.4 Verification of the scheduled delivery timeframe. For the verification of compliance with this deadline, MICI will consider the nature and complexity of the agreed action, as well as the reasonable timeframe required for its implementation.

³³ The process established in this action was modified by mutual agreement between the Parties. At this time, the approach is one of good offices, conducted virtually, with the aim of identifying convergence points for joint action. To this end, MICI is coordinating bilateral meetings with both MRV and IDB Invest. There will be meetings between both parties. MICI will take into account, when determining compliance with the timeline, whether the delay is related to the conciliation process and the definition of the joint action.

IV. Timeline

The timeline for implementing the monitoring plan is set out below:

| The time for imple | | | | | , p.a | | | | | | | |
|---|--|-----|-----|-----|-------|-----|-----|-----|-----|-----|-----|-----|
| Annual timeline for the monitoring plan for the Ituango Hydroelectric Power Plant ³⁴ | | | | | | | | | | | | |
| Activity | Annual monitoring schedule (2024-2029) | | | | | | | | | | | |
| | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May |
| Approval of the Action Plan by the Board of Executive Directors ³⁵ | | | | | | | | | | | | |
| Period for Management to submit documentation to MICI | | | | | | | | | | | | |
| Document review of the implementation of the Action Plan | | | | | | | | | | | | |
| Meetings between MICI and Management | | | | | | | | | | | | |
| Meetings between MICI and the Requesters | | | | | | | | | | | | |
| Drafting of the monitoring plan | | | | | | | | | | | | |
| Publication of the monitoring plan | | | | | | | | | | | | |

This timeline will be repeated in each subsequent year of the monitoring period, which, pursuant to the MICI Policy, is not to exceed five years.
 The Board of Executive Directors approved the Management Action Plan on June 4, 2024.