

**MANAGEMENT ACTION PLAN  
ADDRESSING MICI's COMPLIANCE REVIEW REPORT FOR  
ITUANGO HYDROELECTRIC PROJECT  
(MICI-CII-CO-2018-0133)**

IDB Invest Management would like to thank MICI for the collaborative process in the development of the Action Plan addressing the Compliance Review Report for the Ituango Hydroelectric project (MICI-CII-CO-2018-0133).

IDB Invest welcomes the opportunity to present its Action Plan<sup>1</sup> to the Board of Executive Directors and seek its approval.

IDB Invest would like to note the following key points:

- IDB Invest remains committed to strengthening internal capacities and providing our clients with capacity building related to adequate management of environmental and social risks. IDB Invest will develop the recommended guidance notes, technical briefs, and other instruments to facilitate this process, while continuing customary efforts of assisting clients in achieving their developmental sustainable goals.
- IDB Invest recognizes the value of liaising and partnering with local organizations and benefiting from their knowledge and experience.
- IDB Invest is committed to gender equality and fostering socioeconomic empowerment of small businesses, contributing to fostering inclusion.
- IDB Invest will engage with the Requesters and seek to find agreement on developing an activity acknowledging the ancestral traditions in the Cauca River Canyon in accordance with the sustainability objectives of IDB Invest.
- Lastly, Management wishes to communicate that the development of activities presented in this action plan must observe security restrictions at country and local levels. A security assessment will be needed to confirm safety on the ground before IDB Invest personnel or consultants enter the area.

Management remains at the Board's disposal for any further clarification deemed necessary.

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<sup>1</sup> Recommendations are extracted from the Compliance Review Report for the Ituango Hydroelectric project (MICI-CII-CO-2018-0133).

Thematic Axis	Topic	Recommendation Number	Recommendation	Deliverables	Date
Identification of the affected and potentially affected population	Area of influence and emergency area	1	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	Internal technical note on emergency plan assessment	Q2 2024
		2.1	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	Good practice note for clients and staff on participatory stakeholder mapping including the importance of regular updates	Q2 2024
		2.2	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	Updated supervision report template	Q1 2025

	Emergency areas and disaster risk management	3.1	Technical note clarifying the supervisory role and responsibilities of IDB Invest where government agencies are involved in the disaster risk management	Internal technical note on roles and responsibilities of IDB Invest during emergencies	Q3 2024
		3.2	Develop the general guidelines of PS4 on how clients should act in emergency situations in which government agencies intervene	New General Guidelines for the Environmental and Social Sustainability Policy Implementation Manual for PS4 – client’s role during emergencies	Q3 2024

	Community consultation and participation processes	4	<p>IDB Invest publicly disclose the following:</p> <p>(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.</p> <p>(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.</p> <p>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 Ríos Vivos, in non-technical language, the Panel's work and the conclusions it reached as of the date of its reports</p>	<p>a) Disclose updates to relevant Environmental and Social documents according to the Disclosure of Information Policy valid at the time of the project approval; b) disclose technical opinions rendered by the Independent Advisory Panel translated to Spanish; c) facilitate a meeting with the leader of the Independent Advisory Panel and the Requester's representatives to explain the Panel's work and conclusions.</p>	Q3 2024
		5.1	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	Technical Note for clients on security and contextual risk management, including content on stakeholder participation	Q4 2024
	Information and consultation process on security risks management measures	5.2	Providing training to clients on the topics included in the above technical note	Recorded training on the technical note permanently accessible to all clients	Q4 2024

Assessment of socio-environmental risks and impacts and their management measures		5.3	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	Updated Supervision report template	Q1 2025
		6.1	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, and	Internal technical note on necessary elements of a resettlement plan	Q3 2024
	Involuntary resettlement process	6.2	(d) orientation guidelines for its environmental and social specialists and its clients on external audits in involuntary resettlement processes	Guidelines for staff and clients on external audits of resettlement plans	Q3 2024
		6.3	Develop a specific action for monitoring and updating the resettlement plan to be included in IDB Invest's environmental and social supervision template, as outlined above.	Updated Supervision report template	Q1 2025

	Involuntary resettlement process	7.1	Institutionalize practices for carrying out a contextual analysis at 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	Internal technical note on contextual risk analysis, including content on violence and reprisals, to be used as part of IDB Invest's assessment of environmental and social impacts during appraisal.	Q1 2025
		7.2	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 and with the communities, (3) the potential risk of reprisals against project opponents, and (4) possible management measures of impacts, including strengthening relationships with stakeholders	Guidance note for clients on contextual risk including content on (1) the context of violence and security in which the project is developed, (2) the project's potential interactions with the context of violence and conflict and with the communities, (3) the potential risk of reprisals against project opponents, and (4) possible management measures of impacts, including strengthening relationships with stakeholders.	Q1 2025
		7.3	Incorporate in its environmental and social supervision report template an action to monitor the client's management of measures to address risks of conflict and violence	Updated supervision templates	Q1 2025
	Conflict, security, and violence	8.1	Document 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	Updated ESRS templates	Q3 2024
		8.2	Provide training and guidance to its clients on this topic throughout project implementation	Recorded anti retaliation training permanently accessible to all clients	Q1 2025

	8.3	Include in its environmental and social supervision report template an action to supervise the client's actions with regard to the risk of reprisals	Updated Supervision report template	Q1 2025
	9	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	Change to IDB Invest project page template (banner)	Q2 2024
	10	Strengthening 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.	Recorded training on community security, prevention, and management of conflict in fragile areas affected by conflict and violence available for current E&S staff, and to be included in the onboarding program for new E&S staff	Q2 2025
	11.1	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	Updated Supervision report template	Q1 2025
	11.2	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	Updated ESCR template	Q4 2024

General Recommendations	Biodiversity, habitats, ecosystem services, and water flows	12.1	Since neither IDB Invest's former ROPs nor its current Environmental and Social Sustainability Policy and Implementation Manual provide details on how to design metrics to test the outcomes of biodiversity offsets, 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.	Technical note on assessment of biodiversity offsets including content on results evaluation	Q1 2025
	Scope of supervision	13	Recommends that this concept be developed through 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.	a) Internal guidance on assessing biodiversity offsets, b) Training on general effectiveness of mitigation measures for "migratory pressure" and "security"	Q1 2025
	Development of an instrument for exiting projects responsibly	14	Develop an instrument for exiting projects responsibly in communication with the MICI, OVE and present it to the BOED	Responsible Exit Framework developed. The process will include coordination with other Multilateral Institutions and conversations with the OVE and MICI	Q4 2024
	Support for local initiatives	15.1a	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.	a) Create the content for an educational program about protecting the Cauca River biome in different formats (video, audio, and written report) including an integrated gender perspective. The program will be designed considering input from Requesters and communities from the region.	Q1 – Q3 2025



			b) Disclose the program at IDB Invest website	Q4 2025
15.1b	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.		Two meetings with public authorities, one meeting with private sector representatives and one meeting with Requester's representatives to present the educational program	Q4 2025
			Research on socioeconomic potential and demands in the region plus market analysis and technical constraints for developing small scale business and cooperatives.	Q4 2024
15.2.a	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.		Meetings with people that used to pan and fish to collect views and inputs, including an integrated gender perspective. The meetings will include representatives from Requesters and other communities from the region.	Q1 - Q2 2025
			Study on socioeconomic potential and demands in the region plus market analysis and technical constraints for developing scale business and cooperatives	Q3 2025

				List of institutions that could finance/support the development of small business and cooperatives	Q3 2025
				Disclosure of the study in IDB Invest website	Q4 2025
				a) Implementation of one workshop in Medellin about structuring a proposal to request financing, and b) logistic support for a group of up to 10 Requester's representatives from Bogotá to attend the workshop in Medellin	Q1 2026
		15.2.b	Implementation of technical workshops to structure proposals or project financing for the identified initiatives and support from IDB Invest in the structuring process.	Introduction of Requester's representatives to two potential financing entities	Q4 2026
		15.3	Develop the technical content 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.	a) Technical content on: women's rights, prevention of STDs, domestic violence and gender-based violence and mapping of existing national and regional supporting systems. The technical content will include input from Requesters and communities from the region.	Q4 2024
				b) Disclosure of content on IDB Invest website	

15.4	<p>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.</p>	<p>Upon the approval of the Action Plan and for the duration of a maximum of 60 business days, participate in regular meetings with Requesters, with the support of a facilitator hired by MICI to begin preliminary discussions about an activity acknowledging the ancestral traditions in the Cauca River Canyon in accordance with the sustainability objectives of IDB Invest.</p> <p>If an agreement is reached between IDB Invest and the Requesters on the activity acknowledging the ancestral traditions in the Cauca River Canyon in accordance with the sustainability objectives of IDB Invest, Management will propose a timeline to implement the activity and report to MICI on the advancements on a quarterly basis</p> <p>Implement the activity acknowledging the ancestral traditions in the Cauca River Canyon in accordance with the sustainability objectives of IDB Invest</p>	<p>Q2 – Q3 2024</p> <p>2 months after an agreement is reached</p> <p>12 months after the agreement is reached</p>
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