

<b>Health, Safety (Security), Environment</b>	
<b>MGD-E-BSOG-EN-PLN5-002-D1</b>	
<i>Title:</i>	
<b>Environmental and Social Management Plan for MGD Project</b>	
<i>Topic:</i>	
Defines arrangements in place for the management of environmental and social aspects during MGD Project execution	
<i>Target Group:</i>	
BSOG Management Team, MGD Project Team, EPCIC	

	<b>Name</b>	<b>Position</b>	<b>Signature</b>	<b>Date</b>
<b>Created by:</b>	Horia Herta	Environmental consultant	.....	.....
<b>Format Checked by:</b>			.....	.....
<b>Approved by:</b>	Serge Guibert	CFO	.....	.....

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### ABBREVIATIONS

AESIA	Additional Environmental and Social Information and Assessment
BAP	Biodiversity Action Plan
BAT	Best Available Techniques
BMP	Biodiversity Management Plan
BSOG	Black Sea Oil and Gas
CMT	Crisis Management Team
EBRD	European Bank for Reconstruction and Development
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
EPCIC	Engineering Procurement Construction Installation and Commissioning
ERT	Emergency Response Team
GD	Government Decree
GHG	Greenhouse gases
GSP	Grup Servicii Petoliere (the Project EPCIC Contractor)
GTP	Gas Treatment Plant
H&S	Health and Safety
HDD	Horizontally Directional Drilling
HSE	Health, Safety and Environment
IFC	International Finance Corporation
IRT	Incident Response Team
ISO	International Organization for Standardization
ISPS	International Ship and Port Facility Security
JNCC	Joint Nature Conservation Committee
KPI	Key Performance Indicator
MGD	Midia Gas Development (the Project)
NNL	No Net Loss
Project ESIA	Midia Gas Development ESIA, Xodus, 2018
ROW	Right of way

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### **1.0 INTRODUCTION**

#### **1.1 PURPOSE**

Black Sea Oil and Gas (BSOG) is a Romanian-based independent oil and gas company, targeting exploration and development of conventional oil and gas resources. The company's current portfolio is made up of one offshore concession covering two blocks in the continental shelf of the Romanian Black Sea, namely Blocks XIII Pelican and XV Midia, Shallow Water Area (Midia Block), totalling almost 4,200 km<sup>2</sup>. BSOG's Midia Gas Development Project (MGD Project or the Project) is aimed at putting into production the Ana and Doina gas discoveries.

BSOG operates the two blocks (on the basis of a 65% interest) and makes up the titleholder of the concession together with its partners Gas Plus International BV (15% interest) and Petro Ventures Resources SRL (20% interest).

A comprehensive Environmental and Social Impact Assessment (ESIA) Package has been prepared for the Project. A key part of the Package is the Project Environmental and Social Management Plan (ESMP) as described in this document.

This ESMP builds upon the commitments stated in the BSOG Code of Conduct and the Environmental and Social Policies indicated in section 2.2.1 of this document.

The purpose of this ESMP is to:

- Provide an overview of the environmental and social policies, regulations and standards applicable to the Project to all project staff including subcontractors;
- Document and direct BSOG personnel and guide Engineering, Procurement, Construction, Installation and Commissioning (EPCIC) Contractor on how Project Environmental and Social (ESHS) risks are managed during the construction stage of the Project to conform with applicable policies, regulations and standards and ensure the Project commitments are attained. This includes (i) establishing measures to be applied (ii) communicate requirements to project staff including contractors, and (iii) oversight of requirements implementation, as detailed further in this ESMP;
- Clarify ESHS compliance assurance roles and responsibilities during the construction stage of the Project;
- Ensure that adequate processes are in place to appropriately monitor construction activities against Project ESHS policies, regulations and standards;
- Ensure reporting systems are developed and implemented to communicate ESHS compliance performance to BSOG leadership and further to all project staff including contractors;
- Facilitate continual improvement and ESHS compliance assurance.

The scope of this ESMP details the ESHS management processes associated with the construction and commissioning stages of the Project. This ESMP and associated management plans will be revised as needed to accommodate any new mitigation required and to reflect lessons-learned from the ESHS monitoring.

The ESMP will be subsequently updated and revised as appropriate for the operational stage of the Project to reflect the different ESHS risks at that stage and any lessons-learned to date – referred to as the Operation-ESMP. The Operation-ESMP, along with supporting operational management plans, will be drafted during the end of the construction stage and disclosed not later than 6 months before start of MGD Project commercial operations.

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This ESMP provides an overview of the processes to identify, avoid, mitigate and manage Project ESHS risks during the construction stage. The ESMP is the central document of the Project ESHS management system and is supported by a series of subordinated ESHS management plans and procedures implemented at Company and Contractor levels:

- Company Level ESHS Management Plans – see Figure 3 in section 2 for an overview of the various management plans. These plans lay out the processes implemented by BSOG to ensure Project policies, standards and commitments are attained during the construction stage of the Project and guide EPCIC Contractor on the requirements and management plans to be implemented for the Project as part of their ESHS management system.
- Contractor Level ESHS Management Plans referred to in this ESMP as Contractor Management Plans (CMP) – see section 2.5 for an overview of the ESHS management plans to be put in place by the EPCIC Contractor to ensure implementation of the Project policies, standards and commitments during own Project construction activities.

### *Box 1.1 Project ESHS risks management approach*

The management of ESHS risks of the Project will follow a “cascade” approach, reflecting good international practice:

- The guiding plans and policies are outlined in this ESMP and related Company Level Management Plans;
- EPCIC must - on this basis - develop their own EPCIC-ESMP (to be approved by BSOG) and Contractor Level Management Plans and method statements;
- EPCIC must implement and enforce the EPCIC-ESMP measures in their own activities and those of any of their subcontractors and other service providers;
- EPCIC undertakes periodic monitoring of EPCIC-ESMP implementation (and reports to BSOG);
- BSOG conducts its own overall monitoring of the EPCIC performance (and reports to lenders);
- Lenders and external advisors conduct independent audits.

Updates/revisions to the ESMP and the EPCIC-ESMP will be implemented as appropriate to reflect the ongoing findings of the monitoring and audits, as well as corresponding training of staff. This approach provides for a robust system with continuous improvement of Project ESHS risk management.

## **1.2 THE MGD PROJECT**

BSOG is developing the MGD Project to produce and process gas from discoveries offshore, and route it to consumers within Romania and the region.

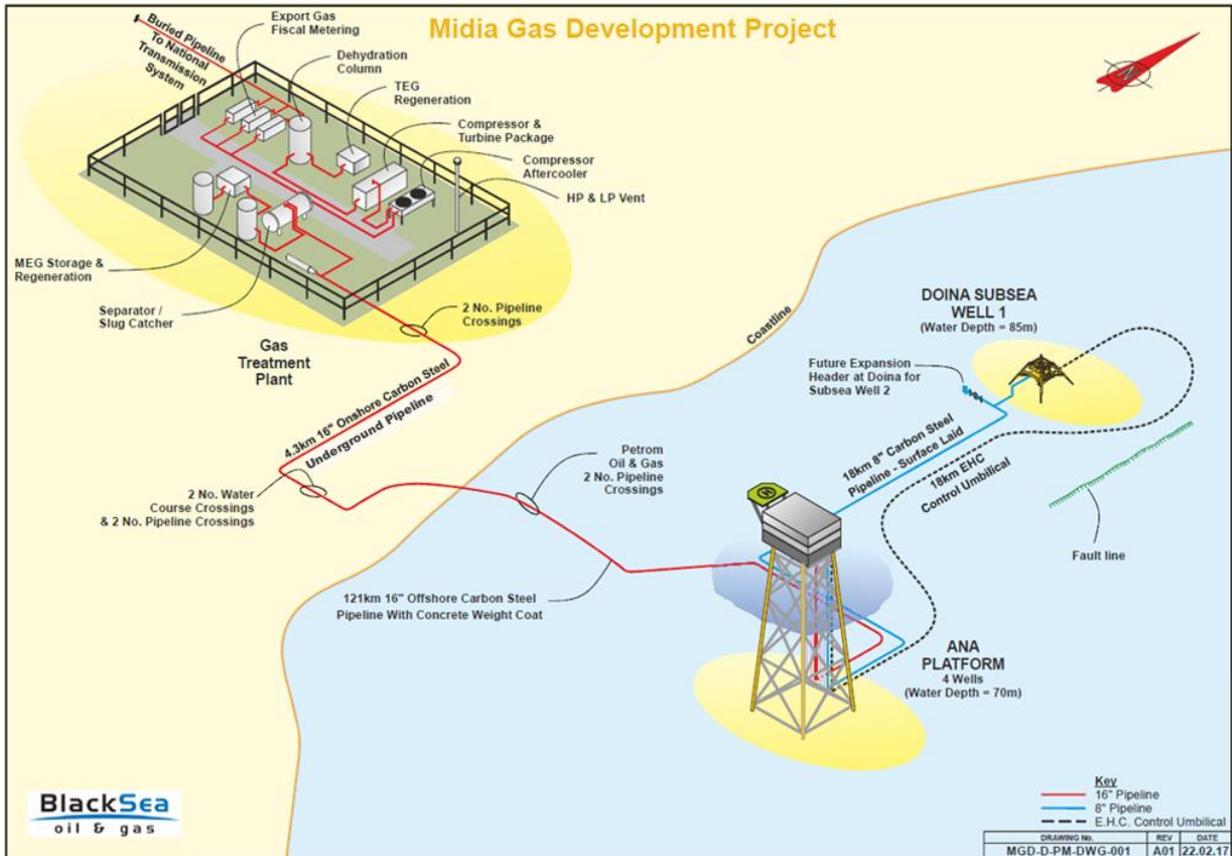
It is proposed to drill four development wells at the Ana field, where a small, normally unmanned platform will be installed to house the wellheads and minimum production control facilities. A further well will be drilled at the nearby Doina field as a subsea development, with gas being routed to the Ana field platform via a subsea 18 km-long, 8” pipeline. The gas from both fields will then be brought to shore through a purpose-built 121 km, 16” pipeline which will have a landfall at Vadu, Corbu Municipality, Constanța County. From the landfall site, gas will be routed through a buried 16” pipeline onshore (approximately

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4.3 km) to a new gas treatment plant (GTP) in the Vadu area where it will be treated prior to injection into the National Natural Gas Transmission System (NTS), operated by TRANSGAZ.

Both the Ana and Doina fields have high methane content (>99 mole%) with minimal contaminants. The fields are predicted to have an overall production life of 10 to 15 years with a predicted peak production capacity of 3.115 million standard cubic metres per day (MMSCMD). This nominal capacity is equivalent to a yearly average of 2.83 MMSCMD.

The overall development is represented in Figure 1 below:



**Figure 1 Overall Schematic of the Midia Gas Development Project**

## Environmental and Social Management Plan for MGD Project

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### 2.0 MGD PROJECT ESHS MANAGEMENT SYSTEM

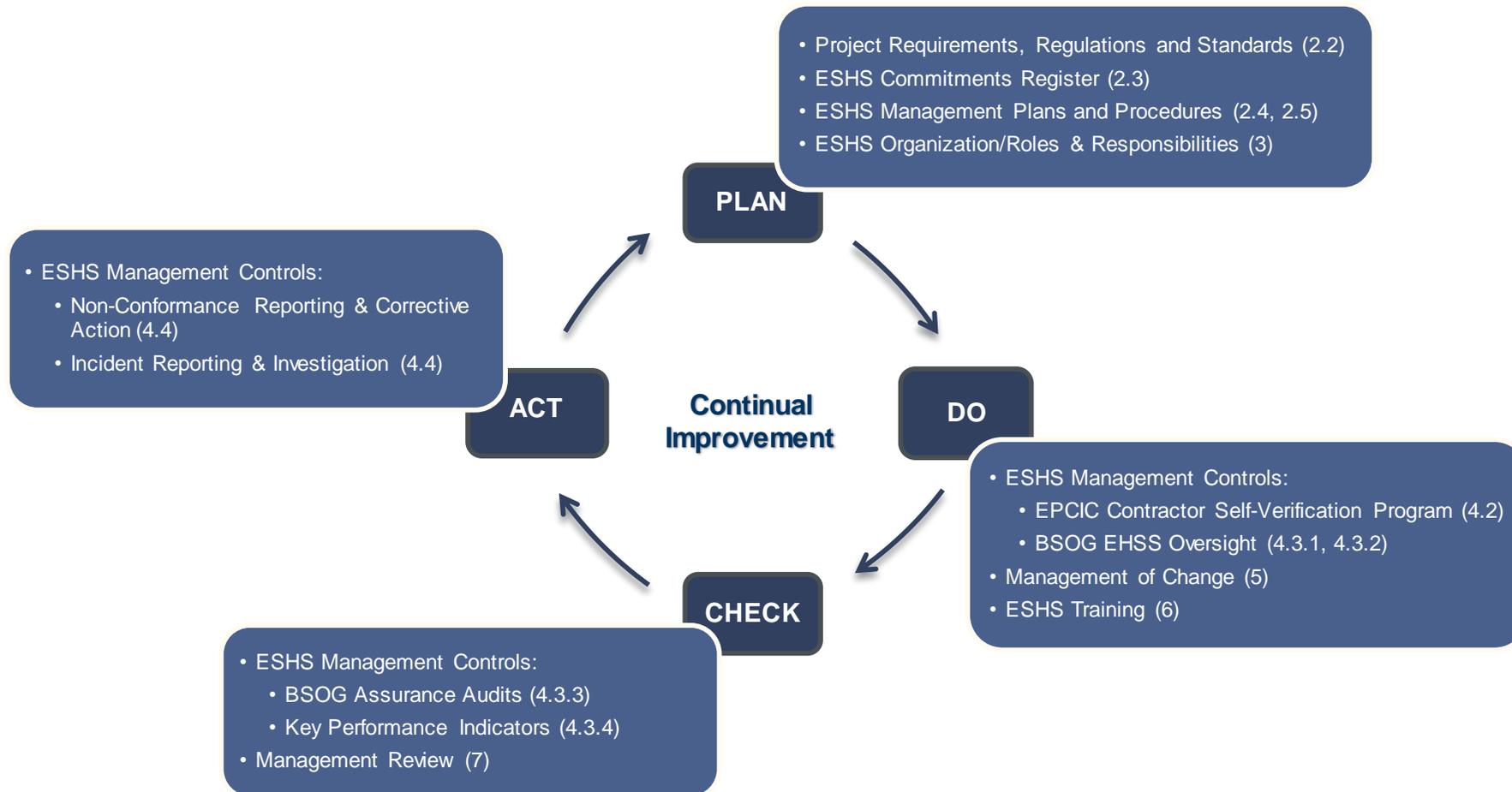
#### 2.1 BSOG MANAGEMENT SYSTEM CONCEPT

BSOG has implemented a management system accredited to ISO 9001, ISO 14001 and OHSAS 18001. This ESMP ties into this management system. The management system is detailed in the HSE Management System Manual (BSOG-HS-MAN1-001-D02 HSE Management System Manual). This section summarizes how the ESMP fits into the MGD Project management system.

The Project ESHS Management System is based on a four-step iterative process aligned with the Plan-Do-Check-Act model as represented in Figure 2 overleaf. The concept reflects an adaptive management loop allowing for accommodation of changes that occur as the Project moves through the various implementation stages.

All of the main activities corresponding to the above four components of the Project ESHS management system are described in the following sections of this ESMP (to facilitate reader orientation, the respective stage of **[PLAN]**, **[DO]**, **[CHECK]**, **[ACT]** is indicated at the subsection headings).

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(Numbers in brackets indicate the ESMP chapters detailing the respective topics)

**Figure 2 MGD Project ESHS Management System Process**

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The Plan-Do-Check-Act model was transposed in the Project's ESHS Management System following a staged approach, organized in three levels (from A to C) as represented in Figure 3 overleaf.

This process is initiated with the identification of the applicable requirements, regulations and standards and the definition of the Company principles and leadership commitments stated in the BSOG Code of Conduct & Business Ethics and ESHS Policies. Subsequently, the Project's ESHS risks and impacts were identified and assessed based on the ESIA package of studies performed for the MGD Project. The ESIA identified the embedded ESHS controls<sup>1</sup> and defined the mitigation measures required to address the residual ESHS impacts and ensure that the Project requirements, regulations and standards are met. Addressing the ESHS risks and impacts represents a Project commitment, more specifically a commitment by BSOG to ensure that these measures will be implemented during the Project execution – either by BSOG themselves or via the EPCIC or other parties.

The ESHS mitigation measures defined as resulted from the ESIA process were transposed into a Commitments Register serving as a tool which informs this ESMP as well as the subordinated ESHS management planning and processes to be implemented at the various levels of the Project organization.

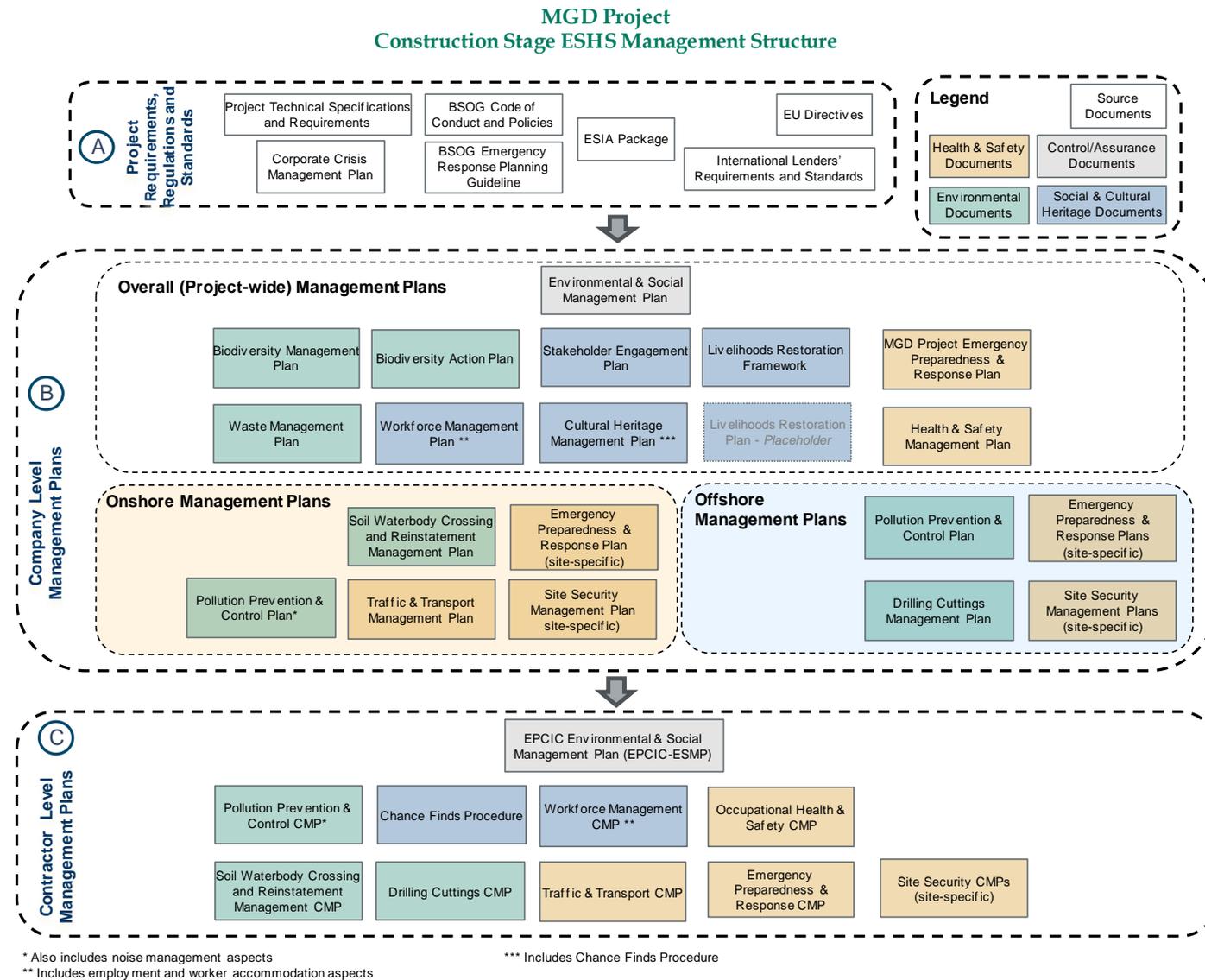
This ESMP is a key component of the Project ESHS risk management system, providing an overview of the processes and tools to manage Project ESHS risks within the frame of the Plan-Do-Check-Act model. The ESMP also sets the requirements for the management planning (operational controls, performance review and evaluation) to be established and maintained by BSOG and the EPCIC Contractors.

The above-indicated management system concept and the relationship between the ESMP, the Project requirements, regulations and standards (see section 2.2) and the management plans at the various levels of the Project ESHS Management System, is represented in Figure 3 overleaf. Each Project ESHS management system component indicated above and represented in Figure 3 is detailed in the following sections of this ESMP.

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<sup>1</sup> *The term "Embedded Controls" refers to those protective measures that are anyhow already included in the approved Project Design, such as high-efficiency boilers, air filters, wastewater treatment, etc. – therefore such items do not normally need to also be added as a further commitment.*

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**Figure 3 MGD Project ESHS Management Structure**

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### 2.2 PROJECT REQUIREMENTS, REGULATIONS AND STANDARDS [PLAN]

BSOG and its EPCIC Contractors are required to meet a number of key ESHS requirements, regulations and standards as outlined below. This ESMP is intended to support transposition of these standards into Project implementation. In cases where the Project requirements and standards are inconsistent or conflicting, BSOG and the EPCIC Contractors are committed to applying the most stringent requirement (unless otherwise justified to its stakeholders and confirmed with Project lenders).

These Project requirements regulations and standards represent the basis of the Project ESHS management system and are represented in Figure 3 – Level A.

The Project requirements regulations and standards are explained below.

#### 2.2.1 BSOG CODE OF CONDUCT AND POLICIES

BSOG has developed a set of overarching ESHS company policies, as listed below, and has committed to implement these on the Project to guide and ensure conformance to the Project Requirements, Regulations and Standards. These are applicable to all activities, including the construction works program and all staff working for the Project:

- Code of Conduct and Business Ethics (BSOG-GV-POL-001-D01);
- Anti-Bribery and Anti-Corruption Policy (GOV-POL-002-D1);
- Corporate Social Responsibility Policy (BSOG-CO-POL-001-D01);
- Quality Policy (BSOG-QA-POL-001-D03);
- Employment Policy (BSOG-HR-POL-001-D01);
- Whistle Blower Policy (GOV-POL-001-D1);
- Environmental Policy (BSOG-HS-POL-002-D02);
- Health and Safety Policy (BSOG-HS-POL-001-D02);
- Major Accidents Prevention Policy (BSOG-HS-POL-004-D01).

These policies establish the framework for the Project's environmental, social, health and safety management processes as further developed and defined within this ESMP.

#### 2.2.2 NATIONAL LEGISLATION AND PERMITTING

Key environmental legislation documents applicable to MGD Project are summarised in this section. A more detailed list of relevant national regulatory documents is provided in Appendix A.

BSOG and its EPCIC Contractor will comply with the requirements of all national laws, regulations and codes of practice, and fulfil all applicable regulatory requirements.

To ensure this, BSOG will maintain throughout the project life cycle both legal requirements and permitting registers to consolidate all applicable environmental and social compliance obligations for the MGD Project.

The EPCIC Contractor will set up a process for tracking and implementing any regulatory changes and requirements updates relevant for their activity.

The permit register constitutes an integral part of the EPCIC contract. The up-to date version of the register (updated as changes occur) is available at all times for both BSOG and EPCIC Contractor through the document sharing and communication platform established for the project.

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### **2.2.3 ENVIRONMENTAL IMPACT ASSESSMENT LEGISLATION**

The EIA procedure is governed by:

- Government Decision no. 445/2009 on environmental impact assessment pertaining to certain public and private projects (GD no. 445/2009) - which transposes the EIA Directive 85/337/EEC and the Directive 2003/35/EC providing for public participation in respect of the drawing up of certain plans and programs relating to the environment and amending with regard to public participation and access to justice Council Directive 85/337/EEC;
- Order no. 135/2010 approving the Methodology for the application of the environmental impact assessment for public and private projects (Order no. 135/2010); and
- Directive 2014/52/EU, amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment.
- According to GD no. 445/2009 an EIA is mandatory for MGD Project because it will involve (as listed on Annex 1 of the GD) the extraction of oil and natural gas for commercial purposes, where the amounts extracted exceed 500 tonnes/day in the case of petroleum and 500,000 cubic metres/day in the case of natural gas<sup>2</sup>.

Order no. 863/2002 approving the Methodological guides applicable to the stages of the environmental impact assessment framework procedure (Order no. 863/2002) contains the approved methodological guidelines applicable in the frame of the EIA framework procedure.

### **2.2.4 ENVIRONMENTAL AND OFFSHORE SAFETY LEGISLATION**

As member of the European Union, Romania has made good progress transposing the EU's environmental, occupational health and safety, employment and social 'Acquis' (body of law, mainly Directives) into national legislation – see Annex 1.

The main enactments governing oil and gas exploration and production in Romania are the Petroleum Law no. 238/2004 and its implementing norms approved under GD no. 2075/2004. These reflect the implementation of Directive 94/22/EC on the conditions for granting and using authorisations for the prospecting, exploration and production of hydrocarbons.

Of particular note, Law no.165/2016 on the safety of offshore oil and gas operations transposed Directive 2013/30/EU. This law aims to prevent or reduce major accident occurrences in offshore fields and to ensure appropriate clean-up and mitigation actions are taken to limit impacts from such accidents. Operators of offshore oil and gas assets are required to:

- Identify and implement all suitable measures to prevent major accidents and limit consequences for human health and the environment in the event of such an accident;
- Develop:
  - a report on major accident hazards;
  - an internal emergency response plan, covering both environment and safety matters and taking into account the major accident risk assessment;
  - a safety and environmental management system;
  - a corporate major accident prevention policy;

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<sup>2</sup> Although not applicable to MGD Project, the Romanian regulator deemed to frame the Project under the “Pipelines for the transmission of gas, petroleum and chemical substances having a diameter exceeding 800 mm and a length of at least 40 km”. Of consequence, the EIA has been made in consideration thereto as well.

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- a description of the scheme of independent verification;
- Obtain approval from the competent authority regulating offshore petroleum operations prior to commencement of operations with fixed and/or mobile installations;
- Demonstrate technical and financial capacity throughout the operations' lifecycle; and
- Notify the competent authorities and other agencies when a major accident occurs and submit the mandated reports on the incident as appropriate.

### **2.2.5 EU AND INTERNATIONAL LEGISLATION**

#### **International conventions and protocols**

Romania has ratified both Aarhus and Espoo international conventions:

- United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters 1998, ratified by Law no. 86/2000 (Aarhus Convention);
- The 1991 UNECE Convention on Environmental Impact Assessment in a Transboundary Context, ratified by Law no. 22/2001 (Espoo Convention);

Compliance with public participation requirements defined by Aarhus Convention will be fully covered by MGD Project through the compliance with Romanian legislation and EBRD standards.

Additional international conventions that are relevant to the MGD Project comprise:

- Convention on the Protection of the Black Sea against Pollution, 1992, Bucharest, ratified by Law no. 98/1992 and related Black Sea Biodiversity and Landscape Conservation Protocol, ratified by Law no. 218/2011;
- IMO Convention for the Prevention of Pollution from Ships, 1973 and the Additional Protocol from 1978, ratified by Law no. 6/1993 (MARPOL 73/78);
- IMO Convention on Oil Pollution Preparedness, Response and Co-operation, 1990, ratified by Government Ordinance no. 14/2000 (OPRC Convention);
- International Convention on Civil Liability for Oil Pollution Damage, 1992, ratified by Government Ordinance no. 15/2000 (CLC Convention);
- European Convention on the Protection of the Archaeological Heritage, 1992, ratified by Law no. 150/1997 (La Valetta Convention);
- European Landscape Convention, 2000, ratified by Law no. 451/2002 (Florence Convention);
- Convention on the Conservation of European Wildlife and Natural Habitats, 1979, ratified by Law no. 13/1993 (Bern Convention);
- Convention on Biological Diversity, 1992, ratified by Law no. 58/1994 (CBD);
- Convention on Conservation of Migratory Species of Wild Animals, 1979, ratified by Law no. 13/1998 (Bonn Convention);
- The International Labour Organisation's Core Conventions (see Appendix A for details);
- The Agreement on the Conservation of Cetaceans of the Black Sea, Mediterranean Sea and contiguous Atlantic area (ACCOBAMS), 2001, established under the auspices of the Bonn Convention (UNEP/CMS).

#### **EU Regulations**

The following EU Regulations are relevant to MGD Project; they are all directly applicable in Romania and will be adhered to by the project:

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- Regulation (EU) No. 525/2013 on a mechanism for monitoring and reporting greenhouse gas emissions and for reporting other information at national and Union level relevant to climate change and repealing Decision No 280/2004/EC;
- Regulation (EU) No. 601/2012 on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council;
- Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on Industrial Emissions (IED);
- Regulation (EC) no. 1272/2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) no. 1907/2006;
- Regulation (EC) no. 1907/2006 concerning the registration, evaluation, authorisation and restriction of chemicals, establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC (REACH);
- Regulation (EC) no. 166/2006 concerning the establishment of a European Pollutant Release and Transfer Register and amending Council Directives 91/689/EEC and 96/61/EC; and
- Regulation (EC) no. 850/2004 on persistent organic pollutants and amending Directive 79/117/EEC.

### **Good International Industry Practice**

The key good international industry practice standards applicable to the Project are:

- EBRD Environmental and Social Policy (May 2014) and associated Performance Requirements;
- The Equator Principles III (June 2013);
- IFC Performance Standards (January 2012);
- IFC Environmental, Health, and Safety (EHS) General Guidelines;
- IFC Environmental, Health, and Safety Guidelines for Onshore Oil and Gas Development;
- IFC Environmental, Health, and Safety Guidelines for Offshore Oil and Gas Development;
- IFC/EBRD Worker's Accommodation: Processes and Standards;
- Voluntary Principles on Security and Human Rights.

### **2.3 ESHS COMMITMENTS REGISTER**

Upon completion of the ESIA process, the mitigation measures to address potential project impacts as defined in the ESIA package were transferred into an ESHS Commitments Register (the Commitments Register). The Commitments Register consolidates the applicable ESHS mitigation measures defined in the ESIA package as actionable measures, management and monitoring activities for implementation during Project execution stages.

This ESHS Management System component is represented in Figure 3 – Level A.

The Commitments Register was developed in an easily understandable format allowing to be used as a tool by the Project ESHS staff during Project execution. For ease of use and implementation the Commitments Register is organized to provide for each commitment indication on:

- the Project stage (i.e. construction and operation) the respective commitment is applicable to,

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- responsibility for implementation (i.e. BSOG and/or EPCIC),
- Project location/site the respective commitment is applicable to, and
- BSOG and EPCIC management plan ensuring implementation of the commitment.

In turn, the Commitments Register informs the Company and the EPCIC Contractors' Management Plans which detail the resources and processes to be put in place to ensure the commitments implementation.

A print out of the Commitments Register represents an integral part of this ESMP and is provided in Annex 2 of this document. The Commitments Register includes, in the case of each item, indication of the management plan(s) ensuring the implementation of the respective commitment.

### **2.4 COMPANY (BSOG) - LEVEL ESHS MANAGEMENT PLANS [PLAN]**

BSOG has overall responsibility for the implementation of the Project ESHS mitigation measures. To ensure this, a number of ESHS Management Plans will facilitate the implementation of Project commitments, requirements, regulations and standards.

These ESHS Management System components are represented in Figure 3 – Level B, referred to as Company Level Management Plans.

The Company-level Management Plans are the following:

- Overall (Project-wide) Management Plans:
  - Biodiversity Management Plan
  - Biodiversity Action Plan
  - Waste Management Plan
  - Workforce Management Plan (includes employment and worker accommodation aspects)
  - Cultural Heritage Management Plan (includes Chance Finds Procedure)
  - Stakeholder Engagement Plan
  - Livelihoods Restoration Plan – Placeholder<sup>3</sup>
  - MGD Project Emergency Preparedness and Response Plan
  - Health and Safety Management Plan
- Onshore Management Plans
  - Pollution Prevention and Control Plan (including, among others, air, noise, water supply and wastewater, spill prevention, contaminated land management)
  - Soil Waterbody Crossing and Reinstatement Management Plan
  - Traffic and Transport Management Plan

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<sup>3</sup> According to current project execution planning, the relevant onshore construction activities will be performed outside of the tourism season. The need for a Livelihoods Restoration Plan will be reassessed in case of changes to the project execution schedule to address any potential tourism-related impacts triggered. Implementation of this requirement will be ensured in the frame of Change Management Process.

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- Site-specific Emergency Preparedness and Response Plans
- Site-specific Security Management Plans
- Offshore Management Plans
  - Pollution Prevention and Control Plan
  - Drilling Cuttings Management Plan
  - Site-specific Emergency Preparedness and Response Plan
  - Site-specific Security Management Plan

Project (Company-level) ESHS Management Plans detail the management and implementation processes required to achieve commitments, requirements, regulations and standards. The main roles of the Project ESHS Management Plans are to:

- Define the processes in place to ensure that BSOG as an organization is implementing the Project commitments, requirements, regulations and standards under their direct responsibility.
- Define compliance and assurance processes to ensure that the work planned and performed is conducted according to the Project ESHS commitments, requirements, regulations and standards.
- Ensure that BSOG implements ESHS oversight of the EPCIC Contractors to measure the effectiveness of their self-verification processes with ESHS commitments, requirements, regulations and standards;
- Define and communicate to the EPCIC Contractors the requirements regarding the specific management procedures they will have to implement during Project execution.

The Project Management Plans will be structured to include but will not be limited to the topics in the following table.

**Table 2-1 Company-level Construction Management Plans**

No.	Project Management Plan	Issues covered
<b>Overall (Project-wide) Management Plans</b>		
1	<b>Biodiversity Management Plan</b>	<ul style="list-style-type: none"> <li>● Plan for implementation of mitigation measures identified in the assessment and in particular, those on critical and natural habitat and priority biodiversity features.</li> <li>● Measures to avoid the introduction and / or spreading of invasive alien species</li> <li>● Sets out requirements for pre-construction check surveys</li> <li>● Monitoring requirements during both the construction and operational phases of the project.</li> </ul>
2	<b>Biodiversity Action Plan</b>	<ul style="list-style-type: none"> <li>● Sets out the aims and objectives of the Biodiversity Action Plan;</li> <li>● Summary of the residual effects from the impact assessment;</li> <li>● Mitigation strategy including:               <ul style="list-style-type: none"> <li>○ How the mitigation hierarchy has been followed,</li> </ul> </li> <li>● The approach to achieving No Net Loss (NNL) of natural habitat / priority biodiversity features and net gains for loss of critical habitat through additional conservation actions and/or biodiversity offsets.               <ul style="list-style-type: none"> <li>○ How NNL will be achieved (Net Gain for critical habitat) including options that are technically feasible, financially feasible and acceptable to landowners / Government;</li> </ul> </li> <li>● Additional measures to promote and enhance the conservation objectives of the affected designated sites</li> <li>● Targets for management measures</li> <li>● Trials required to confirm feasibility of management measures</li> </ul>

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No.	Project Management Plan	Issues covered
		<ul style="list-style-type: none"> <li>• Management measures monitoring</li> <li>• Roles and responsibilities,</li> <li>• Limits of acceptable change and remedial actions if limits exceeded.</li> <li>• Consultation and key stakeholders.</li> <li>• Estimated budget for implementing the BAP.</li> </ul>
3	<b>Waste Management Plan</b>	<ul style="list-style-type: none"> <li>• Non-hazardous and hazardous waste management, including:               <ul style="list-style-type: none"> <li>○ Waste hierarchy implementation (i.e. reduction at source, reuse, recycling, energy recovery, responsible disposal);</li> <li>○ Identification and classification of waste;</li> <li>○ Waste register;</li> <li>○ Waste handling (i.e. collection, segregation and containers, storage, treatment, transport and documentation, disposal);</li> <li>○ Waste duty of care process (waste transfer, waste consignment provisions);</li> <li>○ Monitoring and reporting.</li> </ul> </li> </ul>
4	<b>Workforce Management Plan</b>	<ul style="list-style-type: none"> <li>• Training and skill development activities;</li> <li>• Employee grievance mechanism;</li> <li>• Camp and worker accommodation management aspects</li> <li>• Measures for fair treatment, non-discrimination, and equal opportunity in employment.</li> <li>• Requirements related to provision of safe and healthy working conditions, and the health of workers</li> <li>• Management of potential communicable diseases associated with construction workforce.</li> <li>• Local Content measures address inter alia:               <ul style="list-style-type: none"> <li>○ Promotion of local recruitment at all levels of the Project and facilitating the qualification and recruitment of local candidates, for example with appropriate skills training.</li> <li>○ Measures to maximize use of national subcontractors and suppliers.</li> </ul> </li> <li>• Workers' community interaction behavioural code of conduct</li> <li>• Contractor employment practices conformance, reporting and monitoring</li> <li>• Management measures related to child labour, forced labour, third-party workers.</li> </ul>
5	<b>Cultural Heritage Management Plan</b>	<ul style="list-style-type: none"> <li>• Cultural heritage responsibilities, management and works supervision during construction</li> <li>• Chance finds procedure</li> <li>• Chance finds training, management and response</li> <li>• Interface and coordination with relevant authorities</li> </ul>
6	<b>Stakeholder Engagement Plan</b>	<ul style="list-style-type: none"> <li>• Stakeholder identification and mapping</li> <li>• Stakeholder analysis</li> <li>• Previous engagement activities</li> <li>• Stakeholder engagement plan and record keeping</li> <li>• Grievance mechanism</li> <li>• Monitoring and evaluation</li> <li>• Internal and external reporting</li> <li>• Roles and responsibilities</li> </ul>
7	<b>Livelihoods Restoration Plan (Placeholder)</b>	<p>To address potential tourism-related livelihoods impacts. Need for the plan will be determined in case of project execution schedule changes triggering relevant onshore construction overlapping touristic season. Implementation ensured in the frame of Change Management Process.</p> <ul style="list-style-type: none"> <li>• Livelihoods restoration principles and activities</li> <li>• Eligibility and entitlements</li> <li>• Planning and implementation</li> </ul>

## Environmental and Social Management Plan for MGD Project

No.	Project Management Plan	Issues covered
		<ul style="list-style-type: none"> <li>• Monitoring and evaluation</li> </ul>
8	<b>MGD Project Emergency Preparedness and Response Plan</b>	Provision of a consistent and systematic approach to ensure effective control and management of emergencies that may be encountered during project development on project sites <ul style="list-style-type: none"> <li>• definition of roles and responsibilities, chain-of-command and communication framework</li> <li>• definition of different incident tiers response teams:               <ul style="list-style-type: none"> <li>○ On-site incident response team (IRT)</li> <li>○ Off-site emergency response team (ERT)</li> <li>○ Corporate crisis management team (CMT)</li> </ul> </li> <li>• definition of incident notification procedure</li> <li>• definition of incident notification and investigation requirements</li> <li>• potential incident scenarios and their management</li> <li>• definition of media and public relations during emergency</li> <li>• definition of training and review requirements</li> </ul>
9	<b>Health and Safety Management Plan</b>	<ul style="list-style-type: none"> <li>• MGD Project safety principles and philosophy</li> <li>• H&amp;S policies and commitments</li> <li>• Project H&amp;S objectives</li> <li>• Project H&amp;S challenges</li> <li>• MGD Project H&amp;S management system structure</li> <li>• H&amp;S leadership, organization, competence, communication</li> <li>• H&amp;S contractors management</li> <li>• PPE requirements and enforcement (in line with BSOG-HS-STD-002-D01 PPE Standard)</li> <li>• Incident reporting, investigation and monitoring of Non-conformances</li> <li>• Risk profiling and emergency preparedness and response planning</li> <li>• H&amp;S audit &amp; review</li> <li>• H&amp;S performance monitoring/ improvement</li> <li>• Management of change</li> <li>• H&amp;S records and documents control</li> </ul>
<b>Onshore Management Plans</b>		
10	<b>Pollution Prevention and Control Plan</b>	<ul style="list-style-type: none"> <li>• General pollution prevention and protection measures</li> <li>• Pollution prevention and protection measures at hazardous materials storages, such as bunding of storage areas, tank overfilling prevention measures etc.</li> <li>• Spill prevention containment measures around sensitive equipment, installation of appropriate spill clean-up equipment and development of response procedures</li> <li>• Measures at source to prevent pollutants to enter pathway</li> <li>• Actions to be followed in case pollutants enter the pathway</li> <li>• Management of spill-contaminated soil</li> <li>• Wastewater discharge and management</li> <li>• Construction dust mitigation and monitoring</li> <li>• Noise management,               <ul style="list-style-type: none"> <li>○ Noise abatement/mitigation measures</li> <li>○ Noise monitoring</li> </ul> </li> <li>• Resource Management including:               <ul style="list-style-type: none"> <li>• Objectives, targets, processes in place for resource efficiency</li> <li>• Water abstraction, conservation, discharge measures</li> <li>• Energy and fuel management.</li> </ul> </li> </ul>
11	<b>Soil, Waterbody Crossing and Reinstatement</b>	<ul style="list-style-type: none"> <li>• Pre-construction conditions recording and documentation</li> <li>• Earthworks &amp; construction management               <ul style="list-style-type: none"> <li>○ topsoil management</li> </ul> </li> </ul>

## Environmental and Social Management Plan for MGD Project

No.	Project Management Plan	Issues covered
	<b>Management Plan</b>	<ul style="list-style-type: none"> <li>○ subsoil management</li> <li>○ trenching</li> <li>○ waste soil &amp; rock management</li> <li>○ access restrictions</li> <li>● Temporary/permanent erosion control requirements and measures</li> <li>● Waterbodies crossing               <ul style="list-style-type: none"> <li>○ preconstruction and design considerations to avoid impact to surface waters, sensitive habitats and species (e.g. send and receive pits location to avoid sensitive flora &amp; fauna, location/requirements for settlement ponds and dewatering discharges etc.)</li> <li>○ watercourse crossing construction techniques,</li> <li>○ EPCIC watercourse crossing Method Statements environmental mitigation requirements</li> <li>○ fauna translocation measures</li> <li>○ water quality monitoring</li> <li>○ sediment control</li> <li>○ control measures implementation roles and responsibilities</li> <li>○ specific emergency response procedures</li> </ul> </li> <li>● Reinstatement and revegetation measures, planning, monitoring and verification               <ul style="list-style-type: none"> <li>○ management of reinstatement, soil erosion and sediment control to achieve physical reinstatement of disturbed sites to original condition, upon completion of construction</li> <li>○ bio-restoration requirements (passive and active/assisted revegetation measures)</li> <li>○ monitoring of the implementation and success of ecological mitigation</li> <li>○ maintenance requirements</li> </ul> </li> </ul>
12	<b>Traffic and Transport Management Plan</b>	<ul style="list-style-type: none"> <li>● Traffic-related aspects management for construction traffic</li> <li>● Approved access and haulage routes</li> <li>● Road traffic management including on-site and off-site/public roads speed limits, vehicle inspection requirements, operating rules and procedures</li> <li>● Dust, air emissions, noise abatement requirements and measures</li> <li>● Access roads management</li> <li>● Road-related accidents prevention</li> <li>● Local traffic signage</li> <li>● Oversized equipment shipment road safety and management requirements</li> <li>● Communication in advance of heavy construction traffic through communities</li> <li>● Training of drivers and equipment operators</li> <li>● Community awareness program on traffic-related risks, in line with SEP provisions</li> <li>● Monitoring system</li> <li>● Internal monitoring and reporting</li> </ul>
13	<b>Site-specific Emergency Preparedness and Response Plans</b>	<ul style="list-style-type: none"> <li>● General emergency response considerations for the specific site</li> <li>● Roles and responsibilities, chain-of-command and communication framework</li> <li>● On-site Incident Response Team (IRT) details</li> <li>● Off-site Emergency Response Team (ERT) details</li> <li>● Corporate Crisis Management Team (CMT) details</li> <li>● Incident notification procedure</li> <li>● Incident investigation requirements</li> <li>● Incident management considerations</li> <li>● Media and public relations during emergency</li> <li>● Training and review requirements</li> <li>● Potential emergency scenarios</li> </ul>

## Environmental and Social Management Plan for MGD Project

No.	Project Management Plan	Issues covered
		<ul style="list-style-type: none"> <li>Contingency plan</li> <li>Medical evacuation procedure.</li> </ul>
14	<b>Site-specific Security Management Plans</b>	<ul style="list-style-type: none"> <li>Security arrangements roles and responsibilities</li> <li>Security procedures (contractor and company personnel identification, visitors identification vehicles identification etc.)</li> <li>Security-related communication arrangements</li> <li>Interface with host government agencies and public security forces</li> <li>Provisions to ensure compliance with regulations and good industry practice regarding: <ul style="list-style-type: none"> <li>Security personnel selection and employment</li> <li>Security personnel rules of conduct,</li> <li>Security personnel training, equipment</li> <li>Monitoring of compliance and investigation process of non-compliance acts</li> </ul> </li> <li>Security training program including: <ul style="list-style-type: none"> <li>Code of Conduct modules specific to security personnel</li> <li>Voluntary Principles on Security and Human Rights</li> </ul> </li> <li>Grievance mechanism</li> </ul>
<b>Offshore Management Plans</b>		
15	<b>Pollution Prevention and Control Plan</b>	<ul style="list-style-type: none"> <li>General pollution prevention and protection measures</li> <li>Pollution prevention and protection measures at hazardous materials storages.</li> <li>Additional spill modelling, as needed, to inform emergency response planning</li> <li>Spill prevention containment measures around sensitive equipment, installation of appropriate spill clean-up equipment and development of response procedures</li> <li>Wastewater discharges and management</li> <li>Noise and vibration mitigation and monitoring</li> <li>Resource Management including: <ul style="list-style-type: none"> <li>Objectives, targets, processes in place for resource efficiency</li> <li>Energy and fuel management</li> </ul> </li> </ul>
16	<b>Drilling Cuttings Management Plan</b>	<ul style="list-style-type: none"> <li>Define controls required for WBDF selection, use and discharge.</li> <li>Provide evidence of compliance with GIIP, in particular the requirements of the IFC EHS Guidelines of Offshore Oil and Gas Development, 2015.</li> <li>Solid control equipment, mud and cuttings disposal arrangements</li> <li>Provide details of required in support of biodiversity monitoring</li> </ul>
17	<b>Site-specific Emergency Preparedness and Response Plans</b>	<ul style="list-style-type: none"> <li>General emergency response considerations</li> <li>Roles and responsibilities, chain-of-command and communication framework <ul style="list-style-type: none"> <li>On-site Incident Response Team (IRT) details</li> <li>Off-site Emergency Response Team (ERT) details</li> <li>Corporate Crisis Management Team (CMT) details</li> </ul> </li> <li>Incident notification procedure</li> <li>Incident investigation requirements</li> <li>Incident management considerations</li> <li>Media and public relations during emergency</li> <li>Training and review requirements</li> <li>Potential emergency scenarios for offshore locations</li> <li>Offshore transportation emergency scenarios</li> <li>Contingency plan</li> <li>Medical evacuation procedure</li> </ul>
18	<b>Site-specific Security</b>	<ul style="list-style-type: none"> <li>Security arrangements roles and responsibilities</li> <li>Security procedures (subcontractor and company personnel identification,</li> </ul>

## Environmental and Social Management Plan for MGD Project

No.	Project Management Plan	Issues covered
	<b>Management Plans</b>	visitors identification vehicles identification etc.) <ul style="list-style-type: none"> <li>• Security-related communication arrangements</li> <li>• Interface with host government agencies and public security forces</li> <li>• Security training program as per International Ship and Port Facility Security (ISPS) Code provisions</li> <li>• Grievance mechanism</li> </ul>

### 2.5 CONTRACTOR-LEVEL ESHS MANAGEMENT PLANS [PLAN]

EPCIC Contractors are responsible for the implementation of the ESHS mitigation associated with the execution of the Project construction activities.

To ensure this, the EPCIC Contractors are required to define and implement their own ESHS compliance monitoring and assurance processes for the Project. These will be outlined in EPCIC Environmental and Social Management Plan (EPCIC-ESMP) and topic-specific Contractor Management Plans (CMP).

These ESHS Management System components are represented in Figure 3 – Level C, and referred to as Contractor Management Plans (CMP).

Each EPCIC Contractor is required to ensure that all requirements set in the Project-level ESHS Management Plans and which are relevant to the EPCIC and their subcontractors activities are transposed and detailed in the EPCIC-ESMP and the CMPs.

The CMPs will be compliant with the ESIA package documents, the Commitments Register, the Project Requirements Regulations and Standards referred to in section 2.2 of this ESMP including national and EU regulations, EBRD PRs and IFC PSs.

BSOG will review and approve the EPCIC-ESMP and the CMPs in line with the Project documents approval process.

No construction work is allowed to be performed by the EPCIC or its subcontractors until the EPCIC-ESMP and CMPs are pre-approved by BSOG in line with the Project's formal documents approval process.

#### 2.5.1 EPCIC CONTRACTOR ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (EPCIC-ESMP)

The EPCIC-ESMP is the operational control document defining EPCIC Contractor's self-verification and assurance processes to ensure the Project ESHS commitments are implemented at site level.

The EPCIC-ESMP will detail the roles and responsibilities, the self-verification and assurance processes put in place at the EPCIC organization level to ensure the requirements of this Project ESMP and the ESHS Commitments are met. This will include all aspects related to staffing, roles and responsibilities, resources, self-verification and assurance processes, communication, and management of Non-conformances.

The EPCIC-ESMP will be structured to provide the information in the following table.

**Table 2-2 EPCIC-ESMP content**

EPC-ESMP Suggested Sections	EPCIC-ESMP Required Content
Introduction	<ul style="list-style-type: none"> <li>• Purpose &amp; objective</li> <li>• Reference to EPC ESHS Policies and Procedures</li> </ul>

## Environmental and Social Management Plan for MGD Project

	<ul style="list-style-type: none"> <li>• Applicable ESHS Requirements, Regulations and Standards</li> </ul>
Project ESHS Management	<ul style="list-style-type: none"> <li>• EPC Project ESHS management concept</li> <li>• EPC ESHS Project management documents (EPC-ESMP, CMPs, Subcontractor Method Statements ESHS requirements etc.)</li> </ul>
Project Organization	<ul style="list-style-type: none"> <li>• Overall EPC ESHS Project Organization</li> <li>• EPC ESHS Staffing, Roles and Responsibilities</li> </ul>
ESHS Management Controls	<ul style="list-style-type: none"> <li>• EPC ESHS Self-verification (daily/weekly etc. oversight inspections of own and subcontractor activities, joint inspections with Employer, monitoring etc.)</li> <li>• EPC ESHS Assurance (internal and external audits, management review etc.)</li> <li>• Action Tracking System (system for recording and monitoring of ESHS actions until closure)</li> <li>• Non-conformity Notification, Recording and Corrective Action (ESHS NCR system)</li> <li>• ESHS Incident Reporting and Investigation</li> <li>• ESHS Monitoring Program</li> <li>• ESHS Reporting (daily, weekly, monthly reporting, KPI reporting etc.)</li> <li>• ESHS Documentation Management (ESHS records management)</li> </ul>
Subcontractors Management	<ul style="list-style-type: none"> <li>• Roles &amp; responsibilities</li> <li>• Subcontractor ESHS management planning/method statement requirements</li> <li>• Subcontractor requirements for ESHS self-monitoring and reporting to EPC</li> </ul>
Communication Arrangements	<ul style="list-style-type: none"> <li>• Internal Project communication arrangements (EPC – Employer communication)</li> <li>• External communication (communication with authorities, external Project stakeholders, etc.)</li> <li>• Emergency communication arrangements</li> </ul>
ESHS Training Program	<ul style="list-style-type: none"> <li>• Types of ESHS training (aligned with BSOG Contractor Guidelines for Health &amp; Safety Program Compliance G03-S01)</li> <li>• Training planning, delivery, tracking (aligned with BSOG Contractor Guidelines for Health &amp; Safety Program Compliance G03-S01)</li> </ul>
Change Management <sup>4</sup>	<ul style="list-style-type: none"> <li>• ESHS Change Management Process (interfaces with overall Project Change Management process)</li> <li>• ESHS assessment of Project/Design changes.</li> </ul>

The structure provided in the table above is a suggestion only. While the EPCIC may alter the structure of the EPC-ESMP as needed to align with the own management system requirements, the above indicated content is to be included as a minimum and in a user-friendly and fit-for-purpose format.

### 2.5.2 EPCIC CONTRACTOR CONSTRUCTION MANAGEMENT PLANS (CMP)

The CMPs required to be put in place by each EPC Contractor will generally mirror in terms of topics addressed the Management Plans set at Project (Company)-level (see Figure 3 – Level B). The CMPs are to further detail how the EPCIC Contractor and its subcontractors will implement the requirements outlined in the corresponding Project-level Management Plans and in the EPCIC Contract.

The EPCIC ESHS CMPs will be informed by the Project (Company)-level ESHS Management Plans (refer to section 2.6 above) and shall be generally structured to provide the following information:

- Objectives of the management plan/purpose and scope,
- Reference documents (indication of other Project-level documents and EPCIC CMPs of relevance for the management plan; reference to relevant applicable standards);
- Identification of Project activities/operations associated with the impacts addressed by the CMP and triggering the implementation of all or part of the CMP requirements;

<sup>4</sup> A process for requesting, determining feasibility, planning, implementing, and evaluating Project changes.

## **Environmental and Social Management Plan for MGD Project**

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- Description of management practices employed to implement impacts mitigation and ensure accomplishment of related commitments;
- Roles and responsibilities;
- Subcontractor requirements (including those regarding addressing ESHS aspects in the subcontractor method statements);
- Monitoring and reporting; staff training needs.

The topic-specific ESHS Contractor Management Plans (refer also to Figure 3 – Level C) to be developed and implemented by the EPCIC are indicated 2-3 below:

- Pollution Prevention and Control Plan (including, among others, air, noise, water supply and wastewater, spill prevention, contaminated land management)
- Soil Waterbody Crossing and Reinstatement CMP
- Drilling Cuttings CMP
- Contractor Chance Finds Procedure
- Workforce CMP (includes employment and worker accommodation aspects)
- Traffic and Transport CMP
- Health and Safety Management CMP
- Site-specific Emergency Preparedness and Response CMP
- Site-specific Security Management CMP.

MGD Project stakeholder engagement activities will be managed by BSOG in line with the Project Stakeholder Engagement Plan. While contractors are not required to perform Project-related stakeholder engagement BSOG will work with the contractors to ensure that their CSR-related activities will be aligned with those envisaged by BSOG, as applicable.

## **2.6 OPERATIONAL ESHS MANAGEMENT FRAMEWORK**

This section provides a framework for the ESHS Management planning to be put in place for the operational stage of the Project. The ESHS Management during operation will ensure that all ESHS commitments applicable at the operational stage of the Project are met.

It is envisaged that for the management of the ESHS aspects associated with the operation stage, a similar approach with the management processes detailed in this ESMP will be considered for the ESHS management and performance monitoring.

It is currently envisaged that the operation-stage ESHS Management Framework will comprise following topic-specific ESHS management plans:

- Biodiversity Action Plan;
- Biodiversity Management Plan;
- Pollution Prevention Management Plan (including air quality, noise and waste management aspects)
- GHG Management Plan;
- HR Handbook;
- Stakeholder Engagement Plan;
- Community Health and Safety Plan;

## **Environmental and Social Management Plan for MGD Project**

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- Health and Safety Management Plan;
- MGD Project Emergency Preparedness and Response Plan;
- Site-specific Emergency Preparedness and Response Plans.

These operation-stage management plans will be based on the construction management plans, modified based on lessons learned and anticipating the activities of the operations phase.

The structure of the operational stage management plans will generally follow the requirements applicable for the construction management plans as specified in this ESMP, adapted to meet operation stage risks and issues as needed.

The above-indicated framework is indicative at this stage and will be refined at the stage of the operational readiness planning. The ESMP will therefore be updated in response to this, not later than 6 months before the MGD Project enters operation.

**Environmental and Social Management Plan for MGD Project**

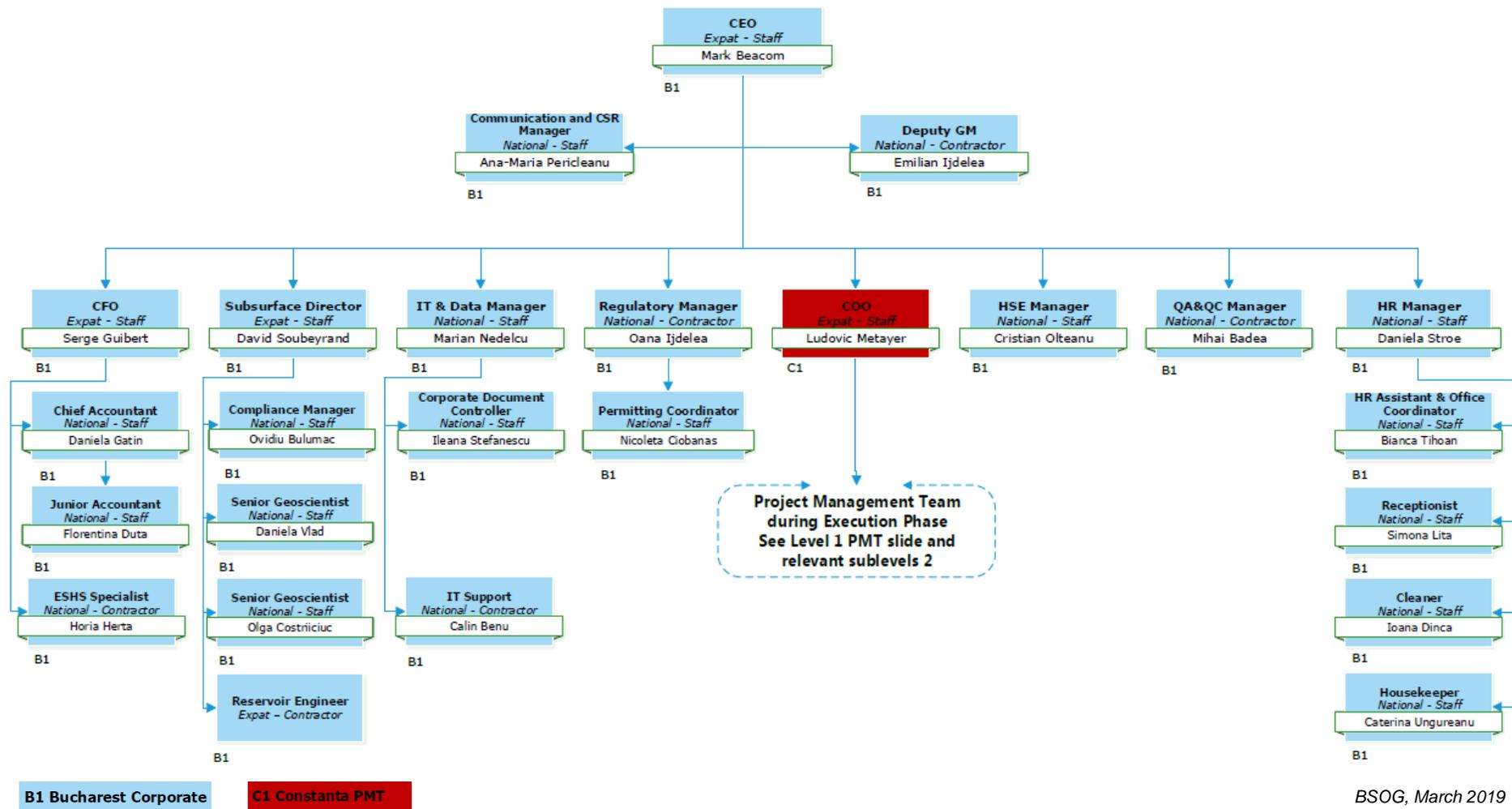
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**3.0 ESHS PROJECT ORGANISATION**

**3.1 ESHS MANAGEMENT PROJECT ORGANIZATION**

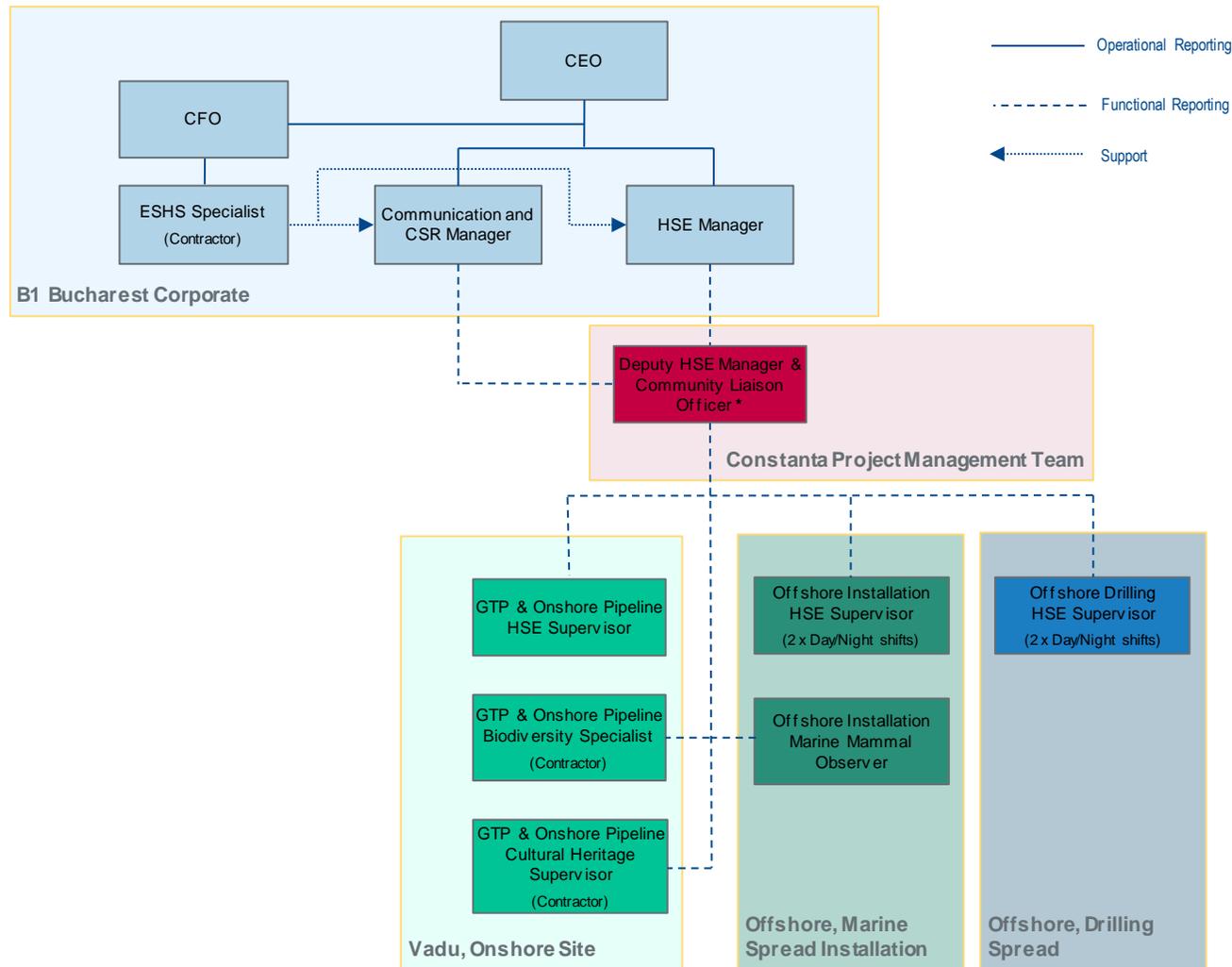
The corporate-level project organization chart is represented in Figure 4 overleaf while the project ESHS management roles are represented in Figure 5.

**Environmental and Social Management Plan for MGD Project**



**Figure 4 MGD Project Organization Chart – Corporate Level**

**Environmental and Social Management Plan for MGD Project**



\* Functional reporting to HSE Manager on health, safety and environmental aspects. Functional reporting to Communication and CSR Manager on social/ aspects

**Figure 5 MGD Project ESHS Organization chart**

**Environmental and Social Management Plan for MGD Project**

**3.2 BSOG ESHS ROLES AND RESPONSIBILITIES [PLAN]**

BSOG is ultimately responsible for ensuring that all project activities comply with the Project ESHS policies, regulations and standards. BSOG will therefore establish an appropriate organizational structure, responsibilities, practices and will ensure the resources necessary for the ESHS management during the Project execution.

Specific main responsibilities of key BSOG staff are summarized in Table 3-1 below. The staff job descriptions detailing individual responsibilities will be aligned with the requirements summarized herein.

**Table 3-1 Key BSOG ESHS staff and associated responsibilities**

Role	Responsibility
<b>Senior Management</b>	<ul style="list-style-type: none"> <li>• Overall accountability for the Project including delivery in line with applicable national and international standards.</li> <li>• Ensures allocation of sufficient resources for the ESMP implementation including for ESHS organization, permitting, training, equipment and qualified personnel.</li> <li>• Ultimate responsibility for ensuring implementation of required corrective actions including in response to identified ESHS non-compliances or incidents.</li> <li>• Ensures periodical review of the ESMP effectiveness in line with the provisions of this plan.</li> </ul>
<b>HSE Manager</b>	<ul style="list-style-type: none"> <li>• Appropriately qualified professional familiar with ESHS aspects associated with internationally-financed projects implementation.</li> <li>• Performing duties both at corporate level and partially on site.</li> <li>• Provide ESHS resources for implementation of the Project ESHS management requirements.</li> <li>• Inform EPCIC Contractors on ESHS responsibilities as defined in this ESMP and detailed in the topic-specific Management Plans and ensure these are understood and implemented throughout all stages.</li> <li>• Ensure that ESHS risks are systematically identified and managed (assessed avoided or mitigated)</li> <li>• Ensure the ESHS oversight of EPCIC Contractors including training, auditing and corrective actions.</li> <li>• Manage the ESHS team’s budget and ensure that ESHS team’s activities are effectively executed.</li> <li>• Provide the Project management team with ESHS management advice, guidance and assurance.</li> <li>• Communicate the content of this ESMP (including any updates) to the BSOG and EPCIC Contractor teams and act as the focal point to promote implementation, performance monitoring and provide guidance and support.</li> <li>• Manage the review and acceptance of EPCIC Contractor ESHS Management Plans.</li> <li>• Inform EPCIC Contractors on ESHS responsibilities as defined in this plan and detailed in the Project ESHS Management Plans and ensure these are understood and implemented throughout all construction stages.</li> <li>• Act as focal point for EPCIC Contractor ESHS oversight in accordance with this ESMP.</li> <li>• Ensure that all ESHS-related incidents are reported and dealt with effectively</li> </ul>

## Environmental and Social Management Plan for MGD Project

Role	Responsibility
	<p>and lessons learned are shared in accordance with the BSOG incident reporting procedure.</p>
<p><b>Deputy Project HSE Manager</b></p>	<ul style="list-style-type: none"> <li>• Appropriately qualified professional familiar with ESHS aspects associated with internationally-financed projects implementation.</li> <li>• Performing duties both at the local project management office and on site.</li> <li>• Supervise and coordinate the ESHS field daily activities at the construction sites.</li> <li>• Support ESHS and construction field staff through assistance with ESHS documents review, incident investigation and technical advice.</li> <li>• Organizing and participating in inspections, reviews and audits of the EPCIC contractor ESHS performance with respect to the requirements of this ESMP.</li> <li>• Perform field-based ESHS oversight of the EPCIC Contractors as required.</li> <li>• Review and provide comments to EPCIC Contractor ESHS Management Plans.</li> <li>• Responsibility for maintaining systematic ESHS records and evidence demonstrating compliance with Project standards.</li> <li>• Ensure that all ESHS-related incidents happened on construction sites are reported and investigated with effectively and lessons learned are shared in accordance with the BSOG incident reporting procedure.</li> <li>• Act as local liaison between the community/stakeholders and BSOG and maintain positive relationship with them.</li> <li>• Ensure that stakeholder engagement activities are documented and evidence (e.g. Minutes of Meetings) are kept on file.</li> <li>• Responsible for the monitoring of Grievance Mechanism implementation at the field level including:               <ul style="list-style-type: none"> <li>○ grievance training, communication and monitoring to the construction staff.</li> <li>○ Verify EPCIC Contractors compliance to grievance management commitments.</li> <li>○ Responsible for monitoring of grievance reporting.</li> <li>○ Responsible for monitoring and managing grievance data quality and ensuring completeness grievance records.</li> <li>○ Support the project team to receive and define grievances and forward them to Communication and CSR Manager and assist in closing the grievances as required.</li> <li>○ Follow up on grievances resolution process</li> <li>○ Maintain the grievances log ensuring it is kept up to date.</li> </ul> </li> <li>• Report to the HSE Manager on daily basis and agreed format on all health, safety and environmental matters and activities performed.</li> <li>• Report to the Communication and CSR Manager on daily basis and agreed format on all social matters and stakeholder activities performed.</li> </ul>
<p><b>Communication and CSR Manager</b></p>	<ul style="list-style-type: none"> <li>• Appropriately qualified professional familiar with ESHS aspects associated with internationally-financed projects implementation.</li> <li>• Performing duties both at corporate level and on site.</li> <li>• Provide functional support to the field staff to implement the social requirements of this ESMP and of the BSOG management system</li> <li>• Coordinate implementation of the Stakeholder Engagement Plan, and perform monitoring of its implementation outcomes</li> <li>• Provide timely information to communities on all Project works through</li> </ul>

**Environmental and Social Management Plan for MGD Project**

Role	Responsibility
	<p>regular meetings with stakeholders and ensure that long term relationships are not negatively impacted.</p> <ul style="list-style-type: none"> <li>• Provide information on potential issues with local communities and stakeholders and contribute to implementing specific measures to prevent and mitigate risks</li> <li>• Identify key stakeholders, requiring engagement in the frame of BSOG stakeholder engagement processes/activities and update regularly the stakeholder mapping in response to stakeholders activities and their relationship with the Project.</li> <li>• Monitor local developments with potential to impact Project activities, and report to the HSSE Manager.</li> <li>• Ensure that stakeholder engagement activities are documented and evidence (e.g. Minutes of Meetings) are kept on file.</li> <li>• Training of contractors on SEP and its implementation process, including the Grievance mechanism</li> <li>• Coordinate and manage implementation of the project Grievance Mechanism. <ul style="list-style-type: none"> <li>○ Ensure BSOG Grievance Committee Meetings are formally documented and recorded</li> <li>○ Prepare responses to grievance raisers and agree content with other members of the BSOG Grievance Committee;</li> <li>○ Responsible for ensuring responses to grievance raisers are provided in line with the Grievance Mechanism provisions</li> <li>○ Report to BSOG Management Team on grievance management.</li> </ul> </li> <li>• Take active role in the in the identification of community needs and assist in the decision process regarding BSOG community investment program.</li> <li>• Responsible for the successful implementation of BSOG community investment program.</li> <li>• Responsible for the project general information disclosure, mass media coverage/press releases.</li> </ul>
<b>ESHS Specialist</b>	<ul style="list-style-type: none"> <li>• Appropriately qualified professional familiar with ESHS aspects associated with internationally-financed projects implementation.</li> <li>• Support role to the HSE Manager and the Communication and CSR Manager</li> <li>• Performing duties both at corporate level and on site.</li> </ul> <hr/> <ul style="list-style-type: none"> <li>• Provide the Project management team with ESHS management advice, guidance and assurance.</li> <li>• Support with communicating the content of this ESMP (and its any updates) to the BSOG and EPCIC Contractor teams and provide guidance and support in its implementation and performance monitoring.</li> <li>• Support in ensuring the ESHS responsibilities as defined in this plan and detailed in the Project ESHS Management Plans are understood and implemented throughout all construction stages.</li> <li>• Provide support in the review and acceptance by BSOG of EPCIC Contractor ESHS Management Plans.</li> <li>• Support with organization of and participation in the review and audits of the EPCIC contractor ESHS performance with respect to the requirements of this ESMP.</li> <li>• Support in the field-based ESHS oversight of the EPCIC Contractors as required.</li> </ul>

**Environmental and Social Management Plan for MGD Project**

Role	Responsibility
	<ul style="list-style-type: none"> <li>Responsible for identifying any specialised expert support required at various project implementation stages and sourcing these as needed, in agreement with the HSE Manager and the Communication and CSR Manager.</li> </ul>
<b>HSE Supervisors</b>	<ul style="list-style-type: none"> <li>Appropriately qualified local/national professionals reporting to HSE manager.</li> <li>Based on site permanently for the duration of the construction works.</li> <li>Perform oversight inspections of the EPCIC Contractors' and subcontractors activities to ensure they align with Project, health, safety and environmental management requirements and with the CMPs/method statements provisions pertaining to health, safety and environment.</li> <li>Provide feedback on inspections findings to the HSE Manager.</li> <li>Provide HSE advice and training/deliver toolbox talks to field teams.</li> <li>Report on HSE compliance and corrective actions implementation to the HSE Manager.</li> <li>Record HSE incidents and follow up on closure by EPCIC.</li> <li>Participate in internal and external HSE audits.</li> <li>Report to the HSE Manager on daily basis and agreed format on all health, safety and environmental matters and activities performed.</li> <li>Report to the Communication and CSR Manager on daily basis and agreed format on all social matters and stakeholder activities performed.</li> </ul>
<b>Biodiversity Specialist</b>	<ul style="list-style-type: none"> <li>Appropriately qualified reporting to HSE Manager</li> <li>Based on site permanently for the duration of the construction works</li> <li>Ensuring that the pre-works data collection surveys are completed sufficiently.</li> <li>Drawing up bespoke method statements for all works within Natura 2000 sites and sensitive habitats, (including sensitive riparian areas). This includes:               <ul style="list-style-type: none"> <li>vegetation clearance methods statement (including check survey methods);</li> <li>flora translocation method statement;</li> <li>fauna translocation method statement; and</li> <li>vegetation re-instatement method statement.</li> </ul> </li> <li>Ensures that walkthrough (rapid assessment) surveys are being undertaken by qualified personnel immediately prior to works commencing in an area.</li> <li>Providing tool box talks to contractors to ensure compliance.</li> <li>Monitoring the works and ensuring that any species discovered are moved away from the works.</li> <li>Monitoring that day-to-day checks are occurring such as checking trenches for fauna and ensuring the other components of the BMP are followed.</li> <li>Draft method statements pertaining to below and supervise their implementation by EPCIC:               <ul style="list-style-type: none"> <li>Vegetation clearance (including check survey methods);</li> <li>Flora translocation (if required);</li> <li>Fauna translocation; and</li> <li>Vegetation re-instatement.</li> </ul> </li> <li>Ensuring that mapping and findings from the field are reported back to relevant stakeholders at regular intervals (at least every two weeks).</li> <li>Reviewing species data in the field to ensure that the receptors selected for</li> </ul>

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Role	Responsibility
	<p>monitoring are appropriate.</p> <ul style="list-style-type: none"> <li>• Undertake protected species check surveys</li> <li>• Identify suitable receptor sites for species translocations</li> <li>• Undertake or provide oversight and direction to contractors undertaking species translocations</li> <li>• Ensuring adequate data is captured to inform the monitoring within the BAP (Biodiversity Action Plan).</li> </ul>
<b>Marine Mammal Observer</b>	<ul style="list-style-type: none"> <li>• Adequately-qualified professional, holding internationally-recognised certification for marine mammal observer work e.g. Joint Nature Conservation Committee (JNCC) or equivalent</li> <li>• Based on site permanently for the duration of offshore and nearshore noise-generating construction works</li> </ul> <hr/> <ul style="list-style-type: none"> <li>• Perform monitoring of offshore and nearshore noise-generating operations (i.e. hammer piling)</li> <li>• Perform passive acoustic monitoring to audibly detect cetacean presence (e.g. in adverse weather or sea state conditions that may prevent visual identification);</li> <li>• Responsible for delaying the start of the operations if cetaceans are detected within 500 m until cetaceans have moved away (i.e. not sighted for at least 30 minutes);</li> <li>• Responsible for suspending, if possible, such operations should a marine mammal be observed approaching too close to operations (risk of injury/hearing impairment close to the source);</li> <li>• Responsible for monitoring enforcement of soft start operations to allow adequate time for any cetaceans to move away from the area before full power is reached;</li> <li>• Responsible for recording all sightings of marine mammals in pre-defined format and supported by photographs;</li> <li>• Reporting to BSOG following the end of the operations, detailing the marine mammals sighted, methods used to detect them, details of any problems encountered and recommendations for any adjustments to these precautionary measures.</li> </ul>
<b>Cultural Heritage Supervisor</b>	<ul style="list-style-type: none"> <li>• Adequately-qualified professional, holding required certification, in line with regulatory requirements</li> <li>• Contracted staff, based on agreement with an approved specialized institution (museum)</li> <li>• Based permanently on site during execution of ground disturbing construction activities</li> </ul> <hr/> <ul style="list-style-type: none"> <li>• Perform oversight of the EPCIC Contractors activities to ensure Cultural Heritage Management Plan and Chance Finds Procedure implementation</li> <li>• Provide training on Cultural Heritage Management Plan and Chance Finds Procedure to relevant EPCIC Contractor staff</li> <li>• In charge of enforcing required Chance Finds site protection measures</li> <li>• Documents and reports on daily activities and chance finds to HSE Manager</li> <li>• In charge with liaising, coordination and reporting to cultural heritage authorities in line with regulatory provisions.</li> </ul>

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### **3.2 EPC CONTRACTOR ESHS ROLES AND RESPONSIBILITIES [PLAN]**

It is EPCIC Contractor`s responsibility to ensure that ESHS compliance is achieved according to the requirements and processes defined in this ESMP. In attaining this objective, the EPCIC Contractor establishes and maintains through its own ESHS Management System a documented process to identify risks and impacts, implements adequate management measures to mitigate these in line with the Project Requirements, Regulations and Standards indicated in section 2.2 of this ESMP. EPCIC Contractor ESHS monitoring of its own activities and its subcontractors ESHS performance is referred to as 'self-verification' and forms the first level of ESHS compliance monitoring under this ESMP.

The EPCIC Contractor is responsible for::

- Self-verification of its own compliance by maintaining a system to manage ESHS aspects and impacts in line with BSOG and its own management system requirements;
- Ensuring that all ESHS Non-conformances and incidents are reported and dealt with effectively and that lessons are learned;
- Ensuring their organizations have adequate resources and expertise for ESHS compliance monitoring and control to meet the ESMP requirements;
- Keeping BSOG fully informed of any ESHS issues;
- Recording and reporting monitoring observations, required actions and raising non-conformance reports where appropriate;
- Instructing own and subcontractor staff in their responsibilities with respect to compliance assurance and incident reporting and response;
- Provide training on the MGD Project Stakeholder Engagement Plan and Grievance Mechanism. Ensure facilitation of any grievances received into the Project Grievance Mechanism
- Cooperating with BSOG in relation to ESHS compliance assurance activities;
- Participating in joint inspections, performance reviews and audits as required by BSOG;
- Providing BSOG with access to monitoring records (including all relevant documentation and databases) as required;
- Ensuring adequate expertise, planning and resources are in place to appropriately identify ESHS risks sufficiently in advance of construction, in order to ensure compliance;
- Identifying ESHS risks as part of its planning processes and through implementation of appropriate mitigation measures and communicating these to its workforce;
- Reporting to BSOG on ESHS performance, including KPIs on weekly and monthly basis in a commonly agreed format;
- Maintaining and reporting updated registers to BSOG that capture the range of compliance monitoring and assurance information necessary to demonstrate that Project ESHS standards are being met during construction works execution.

In order to ensure implementation of the above, the EPCIC Contractors are required to structure their organizations to include sufficient and adequately qualified ESHS staff. The EPCIC Contractor is responsible for determining the required number of ESHS personnel to ensure that Project ESHS policies, regulations and standards are met throughout works execution. Furthermore, the EPCIC Contractor is responsible to ensure that their subcontractors implement throughout their Project activities the requirements set forth in this ESMP and subordinated plans. For this purpose, the EPCIC Contractor is required to put in place adequate, documented processes for supervision and monitoring of subcontractor responsibilities.

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EPCIC Contractor's ESHS team is to include appropriately qualified personnel covering following roles (individual positions may combine multiple roles as appropriate):

- HSE Manager(s) (responsibilities including Environmental, Social, Health and Safety, and Cultural Heritage aspects);
- ESHS Supervisors
  - multiple positions as needed;
  - including a biodiversity specialist responsible for implementing requirements management and monitoring for biodiversity protection
  - to ensure permanent presence of one ESHS Supervisor on each construction work site and each shift.

In case, during project execution, BSOG's monitoring of EPCIC Contractor's ESHS performance indicates insufficient ESHS oversight, compliance assurance resources or practices, BSOG is entitled to enforce required corrective actions on the respective EPCIC Contractor. This may include requiring the EPCIC Contractor to allocate additional ESHS staff and resources.

## **Environmental and Social Management Plan for MGD Project**

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### **4.0 ESHS MANAGEMENT CONTROLS**

#### **4.1 GENERAL APPROACH**

ESHS Controls in place during the Project construction stage are based on an ESHS compliance assurance (monitoring and reporting) process to ensure that ESHS Project policies, regulations and standards are met.

BSOG's management controls focus on the following points:

- i. the implementation of the Project's ESHS Management System described in this ESMP,
- ii. implementation by the EPCIC Contractor of the Project Policies, Regulations and Standards,
- iii. oversight of EPCIC Contractor activities, and
- iv. compliance assurance to verify that the works are performed according to the Project Policies, Regulations and Standards and in line with ESHS management system.

This ESHS (compliance assurance process (including the full range of environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) is implemented at two levels:

- First level: EPCIC Contractor Self-Verification program (inspections, monitoring, reporting) to demonstrate compliance with ESHS policies, regulations and standards, and to provide evidence that EPCIC meets their obligations. Includes oversight of subcontractors.
- Second level: BSOG Oversight and Assurance activities.

Oversight is performed by BSOG ESHS staff to ensure that BSOG-own and EPCIC Contractor's activities (including their ESHS self-verification) are aligned with the Project standards and the provisions of this ESMP. This includes review of ESHS reports, documentation, monitoring data, procedures & plans, undertaking formal inspections and attendance of meetings with EPCIC Contractors to drive performance and raise issues.

Assurance activities are performed by personnel (or specialized service providers) not directly involved in the works being checked, to provide an additional layer of assurance beyond self-verification and oversight and measure the compliance of Project activities. Assurance process comprises targeted audits and formal reviews. Assurance activities are typically detailed and focused on defined risk areas or guided by feedback from the results of the self-verification and oversight activities.

In addition to the above, independent audits of compliance with Project Requirements, Regulations and Standards and including both BSOG and EPCIC Contractor performance are performed periodically, typically on annual basis.

The controls put in place to manage, monitor, measure and report compliance with Project ESHS policies, regulations and standards during the Project construction stage are outlined in this ESMP section.

#### **4.2 EPCIC CONTRACTOR SELF-VERIFICATION PROGRAM [DO]**

EPCIC Contractor is required to operate an Environmental and Social Management System (ESMS) in alignment with the principles of ISO14001 and OHSAS 18001, which requires self-verification of compliance in accordance with the plan-do-check-review cycle (ESMS accreditation to ISO14001 and OHSAS 18001, although recommended, is not a requirement).

As part of its construction works planning, EPCIC Contractors are required to prepare and implement an EPCIC ESMP and topic-specific Contractor Management Plans (refer to sections 2.7.1 and 2.7.2). These EPCIC Contractor ESHS management planning documents will detail how the EPCIC Contractor will meet and comply with the specific Project ESHS (including environmental, occupational health and safety, labour and working

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conditions, socio-economic, community safety and cultural heritage aspects) policies, regulations and standards through a self-verification program including:

- Performing ESHS inspections and audits of own (EPCIC) and subcontractor activities;
- Performing ESHS monitoring;
- Implementation of a non-conformance and incident notification and response;
- Implementation of an EPCIC Contractor ESHS Action Tracking System.

### **4.2.1 EPCIC CONTRACTOR INSPECTIONS AND AUDITS**

To provide assurance that the provisions of the topic-specific management plans/method statements are implemented effectively, EPCIC Contractors are required to implement a program of documented inspections and audits at Project sites and the associated facilities addressing own activities and those performed by subcontractors.

This includes undertaking walk-around inspections during construction works execution to visually monitor that mitigation measures are implemented, undertaking joint inspections with BSOG using checklists, and engagement with project-affected parties, stakeholders and regulators. These activities will include inspection of subcontractor labour and working conditions aspects against Project Requirements, Regulations and Standards with quarterly frequency.

EPCIC Contractor internal audits will be performed in line the EPCIC Contractor's management system procedures as approved by BSOG. As a minimum ESHS internal audits are to be performed by the EPCIC Contractor on annual basis. Focused audits or performance reviews addressing specific aspects as required in line with the Project stage are to be performed every 6 months. The audits are to be performed by an interdisciplinary team of appropriately qualified health and safety, environmental and social auditors. BSOG ESHS staff may join the EPCIC audit team and participate in the EPCIC Contractor's internal audits.

### **4.2.2 EPCIC CONTRACTOR ACTION TRACKING, NON-CONFORMANCE AND INCIDENT RESPONSE AND NOTIFICATION SYSTEM**

In response to any issues, observations, non-conformances and incidents, the EPCIC Contractor is to propose appropriate corrective actions and record these (including responsibilities and timescale for completion) in its own ESHS (including environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) Action Tracking System (ATS). The ATS shall be implemented in order to ensure recording and follow-up of Non-conformances and incidents and their associated corrective actions..

BSOG ESHS management staff will review EPCIC Contractor's ATS on a regular basis, typically on weekly basis, and will follow-up on progress to confirm actions closure.

A two tiers non-conformances management process has been defined for the MGD Project following a risk-based approach in line with the BSOG Non-Conformance Management Procedure (BSOG-QA-PRO-001-D01). Non-conformances identified as result of inspections, monitoring and audits performed are recorded by EPCIC Contractor as actions to be addressed within their own management systems and reported to BSOG in monthly reports as a minimum.

EPCIC Contractor is required to implement own ESHS Incident Reporting and Investigation procedures. All ESHS incidents and near misses will be notified to BSOG. Incidents will be notified immediately as they occur, while near misses will be reported on weekly basis.

BSOG reserves the right to carry out its own investigations of EPCIC accident/incident/near-miss/non-conformance or be part of EPCIC investigation teams.

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BSOG HSE Manager will review and qualify Non-conformances and incidents reported by EPCIC Contractor. BSOG HSE Manager will regularly meet relevant EPCIC Contractor representatives to review the Action Tracking System and status of actions progress and closure.

### **4.2.3 EPCIC CONTRACTOR MONITORING AND REPORTING**

The procedures for monitoring implementation and outcomes of the ESHS mitigation measures, ESHS KPIs and environmental and social monitoring are defined by each EPCIC Contractor in their CMPs and method statements. The monitoring frequencies, parameters, methodology and duration are determined based upon site activities requiring monitoring, which is assessed on a case by case basis dependent upon construction activity type and location.

EPCIC Contractor is responsible for reporting monitoring results to BSOG on monthly basis.

## **4.3 BSOG ESHS OVERSIGHT AND ASSURANCE PROGRAM**

### **4.3.1 BSOG ESHS OVERSIGHT (MONITORING) [DO]**

ESHS oversight is aimed at monitoring construction works activities to determine whether environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage mitigation measures implemented by EPCIC Contractors are effective (i.e. are avoiding and minimizing the impacts as intended, or whether work practices require revision).

During construction stage, ESHS oversight monitoring is undertaken by the BSOG HSE Manager through ongoing review and follow-up on EPCIC Contractor's weekly and monthly reports and on non-conformance/incident reporting, as well as by performing inspections of the construction work sites.

The ESHS oversight inspections are performed regularly, on monthly basis, and are intended to highlight key EPCIC Contractor conformance aspects, and their outcome is used to determine the required actions. In addition to the regular monthly inspections, unscheduled inspections (spot-checks) of critical/key Project areas are performed as needed. The locations and timing of the unscheduled inspections are determined based on the ongoing Project activities and issues, as informed by the EPCIC Contractor weekly/monthly reports and the non-conformance/incident reporting.

The ESHS oversight is aimed at addressing all Project ESHS aspects and worksites and ensure that each of them are visited yearly as a minimum.

Checklists may be used in support of the field inspections which may be organized based on specific ESHS topics addressing key aspects associated with the construction works activities being inspected.

Inspections observations and findings are discussed with EPCIC ESHS representatives to determine and agree on any required actions.

BSOG ESHS oversight (monitoring) reports are generated as simple records to include:

- indication of the construction works/site inspected;
- indication of the construction activities inspected;
- observation notes providing description of positive aspects, good practice or issues/non-compliances identified;
- photographic evidence of the observations made/issues identified.

Where ESHS oversight (monitoring) inspections identify issues or Non-conformances, the remedial actions required in response are discussed and agreed with the EPCIC Contractor and recorded into the EPCIC Contractor's ATS.

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### **4.3.2 BSOG REGULAR ESHS OVERSIGHT REPORTING [DO]**

A brief ESHS oversight report is provided by the EHS Manager to BSOG Project Management on quarterly basis. The report summarizes the key issues and challenges during the reporting period as resulted from the ESHS oversight inspections and the review of the EPCIC Contractors' ESHS reports and ATS status.

Regular reporting is intended to keep BSOG Project Management informed on ESHS aspects, so that direction and feedback can be provided to EPCIC Contractors and leadership support obtained for addressing key and more strategic issues at appropriate decision levels as applicable.

### **4.3.3 BSOG ESHS ASSURANCE AUDITS [CHECK]**

Environmental, social, health and safety audits of each EPCIC Contractor are performed on annual basis or upon attaining specific construction works delivery milestones by the EPCIC Contractor (e.g. 0 – 50%, 50-100% construction works execution).

The ESHS Assurance Audits are conducted primarily by BSOG staff independent of the activities audited, or by contracted specialized third-party specialists to provide assurance of oversight and self-verification activities.

The EPCIC Contractors are formally notified about the ESHS audits and their scope which may include but not be limited to:

- EPCIC Contractor ESHS organization/staffing adequacy;
- EPCIC Contractor ESHS documentation;
- Implementation by EPCIC Contractor of the ESMP and CMPs, method statements and specific ESHS Procedures;
- ESHS training and inductions;
- ESHS Key Performance Indicators (KPIs);
- ESHS Non-conformance and incident reporting, tracking and closure.

Audit protocols are developed based on the defined scope and used by auditors for guidance and for recording audit observations including good practice and Non-conformances.

Audit outcomes are summarized in reports and formally communicated to and discussed with the EPCIC Contractor. Any required corrective actions are agreed with the EPCIC Contractor and recorded in their ATS and/or Non-conformance Reporting system as appropriate. Progress in addressing the audit findings is followed up on a regular basis to close the open and pending actions and reported monthly.

### **4.3.4 KEY PERFORMANCE INDICATORS (KPI) [CHECK]**

BSOG and its EPCIC Contractors will track and monitor various performance indicators both leading and lagging so as to identify potential trends in environmental, safety and social performance, as defined in the topic-specific management plans.

## **4.4 INCIDENT AND NON-CONFORMANCES REPORTING, INVESTIGATION AND CORRECTIVE ACTIONS [ACT]**

Non-conformances and incidents are recorded, reported, investigated and addressed in line with the following Project guidelines and procedures:

- BSOG-QA-PRO-001-D01 Non-Conformance Management Procedure
- BSOG-HS-GDL-008-D03 Incident and Non-conformances Reporting, Investigation And Monitoring Guideline

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- BSOG-HS-PRO-002-D01 HSE Incident Reporting and Investigation Procedure

According to the above-indicated procedures, all non-conformances and incidents (including near- misses) will be investigated to establish the immediate and underlying/root causes (plans must be established to deal with immediate risks following unforeseen events) and to identify actions to:

- Evaluate and correct the situation as quickly as possible;
- Assess and limit adverse ESHS effects relating to the incident;
- Prevent a recurrence and improve ESHS performance; and
- Ensure planned actions integrate with other ESHS requirements, including contractor interfaces where appropriate;
- Improve the future management of risk;
- Ensure lessons are learned throughout the Project organization;
- Demonstrate commitment to effective ESHS management.

Non-conformances are unapproved deviations from BSOG ESHS Specifications or Standards or deviations from BSOG or EPCIC Contractor Management Plans. These are typically identified through the oversight and assurance process (e.g. daily monitoring, oversight inspections and audits).

Non-conformities may be categorised as minor or major and are recorded and reported in a pre-defined format including: description of source/cause, categorization (severity), description and evidences, responsible party and corrective actions.

Non-conformances are recorded in a register maintained by BSOG and acting as a tool for following up on non-conformances to closure.

Incidents are classified using a 3-level severity scale (i.e. Minor, Serious, Major) and aligned with severity definitions and reporting timeframes detailed in BSOG-HS-PRO-002-D01 HSE Incident Reporting and Investigation Procedure.

All incidents and accidents taking place on contractor's locations and/or facilities, while under contract with BSOG will be reported to the BSOG Duty Manager, CEO and HSE Manager by e-mail within 12 hours from incident occurring, in addition immediate telephone notification will be made for severity 2 and 3 incidents.

All incident investigations are conducted and documented to appropriate level of detail dependent upon the severity of the incident.

Actions identified as being required in the incident investigation report are recorded on Corrective Action Forms to prevent reoccurrence of similar incident. Action plans for the remedial measures implementation as identified in the investigation are defined and include information on responsibilities, resources required, completion dates and reporting requirements.

The status of corrective actions and associated action plans are tracked and once all the actions completed, this is recorded in a Corrective Action Form signed off for closure. The status of corrective actions implementation and closure is tracked in the Project Incident Register.

Incident reports and key incident statistics are analysed for trends for each project activity and reported on a monthly basis as part of the performance monitoring program. Relevant findings are communicated throughout the Project organization.

Arrangements for incident reporting and investigation system, as well as the effectiveness of corrective actions are periodically reviewed, with annual frequency as a minimum as part of the management review process.

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### **4.5 EXTERNAL REPORTING [ACT]**

BSOG will prepare an annual report on environmental, health and safety performance and implementation of the stakeholder engagement plans and grievance procedure. The annual report will be disclosed on the BSOG website.

In addition, BSOG commits to following external reporting:

- Statutory Notifications and Reporting to national regulatory bodies as required in line with the applicable regulations and Project permits
- Incident Notification and Reporting.

According to the incident reporting procedure in place, medium and major incidents (fatalities included) are to be reported to authorities within 2 hours from occurrence. Any such incidents will be also reported to MGD Project lenders within 72 hours.

All environmental and social incidents will be appropriately documented, notified and reported in accordance with established procedures as indicated in previous sections of this ESMP.

Incident notification and reporting to relevant national regulatory bodies will be performed in line with applicable legislation in force and as stipulated in permits and licenses.

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### **5.0 MANAGEMENT OF CHANGE [DO]**

The process in place to manage changes impacting ESHS aspects of the project are integrated in the overall change management process applicable to all Project Changes and are driven by the requirements set forth in the BSOG-HS-GDL-006-D02 Management of Change Guideline.

ESHS changes addressed in this ESMP section include:

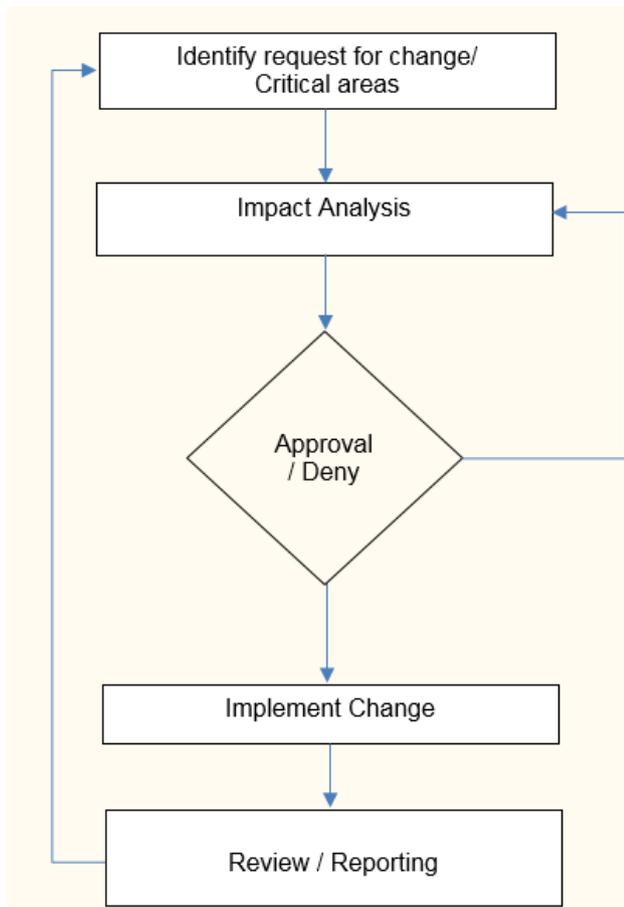
- new planned activities or processes and or changes in project activities, design or footprint leading to potential impacts that were not subject to assessment as part of the Project ESIA package;
- changes to ESHS management, mitigation and monitoring commitments not considered in the Project ESIA package;
- changes/updates of legal and regulatory requirements, technical codes and business objectives that may trigger potential impacts that were not subject to assessment as part of the Project ESIA package.

Triggers for consideration in relation to changes specified above may include:

- Design refinement or detailed design outcomes
- Changes in construction methodologies;
- Field obstacles during construction;
- Results of further field surveys and monitoring;
- Comments/concerns submitted by public/stakeholders/lenders;
- Changes in regulations or requirements by regulatory bodies.

The Management of Change provides for a simple ESHS management of change process, as represented in Figure 6 below.

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**Figure 6 ESHS Change Management Process**

The ESCH change management process is managed by the HSE Manager and comprises the following main steps.

**Change Identification**

ESHS changes are identified various ways, including requests by the EPCIC, engineering, construction teams and are summarised in a Management of Change Form (as defined in BSOG-HS-GDL-006-D02 Management of Change Guideline).

**Change Impact Analysis and Notification of Changes**

Upon receiving the Management of Change Form, the HSE Manager with the support of the ESHS Specialist undertakes performs:

- An assessment of proposed change risks based on the BSOG-HS-STD-001-D02 HSE Risk Management Standard
- Screening review of any proposed changes that have the potential to give rise to new or additional significant impacts (positive or negative) which differ to those identified as part of the ESIA Package.

The Screening will be performed by/under the direction of the HSE Manager, with involvement as warranted of the of the ESHS Specialist, other BSOG staff and EPCIC Contractor Environmental Expert/Design Team, and/or with support from external specialized consultants. To assist with the review, a Change Screening Matrix will be used.

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The potential outcomes of the Changes Screening can be grouped in 3 tiers In relation to environmental and social impacts (in line with the corresponding definitions in the ESIA package) as follows:

- Tier 1 Changes – Changes where the potential impact of the change prior to mitigation will be no more than minor.
- Tier 2 Changes – Changes where the potential impact of the change prior to mitigation will be moderate.
- Tier 3 Changes – Change were the potential impact of the change prior to mitigation will be major.

Tier 1 Changes will be implemented by BSOG without notifying the MGD Project lenders.

For Tier 2 Changes, BSOG will inform the Project Lenders of the change, but will not have to secure their approval prior to implementing the change.

For Tier 3 Changes, BSOG will seek approval from the Project Lenders prior to implementing the change.

The following changes will be considered as Tier 3 Changes:

- Changes to the Project design and footprint or activity that may result in a potential new major impact, or elevate an impact already assessed to a potential major impact (e.g. this includes any changes that may result in additional impacts on critical habitat).
- Changes to commitments to mitigate or avoid potential impacts that may result in a potential new major impact.

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### **6.0 ESHS TRAINING [DO]**

#### **6.1 OBJECTIVES**

BSOG is committed to ensure that ESHS training is delivered to all staff as required for delivering their roles. In the frame of the recruitment process, Project staff is verified for competency and experience. Following employment with the Project, the staff receive adequate induction and ongoing ESHS training according to a training plan.

The aim of the induction training is to make Project staff aware of the actual or potential actual or potential ESHS risks associated with their work activities, their behaviour, and of the potential consequences of departure from the Project ESHS procedures.

In addition to the induction, the new Project staff will further undertake specific ESHS training commensurate with their roles. Employed training process shall take into account different levels of responsibility, ability, language skills, and risks associated with each position.

A system for evaluating the effectiveness of the training or action taken will be implemented. Training records will be documented and held on file.

EPCIC Contractor and service providers are contractually bound to implement specified ESHS training requirements.

#### **6.2 EPCIC OBLIGATIONS**

The EPCIC Contractor ESHS training and competency requirements are contractually specified.

EPC Contractor shall ensure that all construction employees (own and subcontractor staff) are adequately qualified and have the ESHS knowledge and skills required for the execution of their work duties.

Prior to the commencement of the work, EPCIC Contractor shall submit a Training Plan identifying specific training requirements against each job title for review and acceptance by BSOG.

The Training Plan is to be based on an analysis of training requirements and should comprise:

- an induction training program to be delivered to all personnel (own and subcontractor staff), vendor representatives and site visitors;
- general and job/task-specific training as needed for the performance of the duties to which the person (own and subcontractor staff) is assigned to.

The Training Plan will include a Competency/ Training Matrix. The Competency/ Training Matrix is to be developed as a tool documenting and comparing the required competencies for a position with the existing skill level of the employees performing the roles and shall be used to determine the training needs. The Competency/ Training Matrix is also to be used as a tool for managing people development.

The Training Plan and the Competency/ Training Matrix are to provide the mechanism to ensure that training is timely delivered and the training program is effective. For this purpose the EPCIC Contractor is to perform regular evaluations throughout the construction works period to ensure that the Training Plan has achieved its objectives i.e. that all staff (own and subcontractor employees) are suitably qualified, competent and fit for their job duties. The frequency and timing of such evaluations is to be determined by the EPCIC Contractor and subject to BSOG approval.

Implementation of ESHS training requirements will be reviewed by BSOG throughout the contract period according to the provisions of this ESMP.

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### **7.0 MANAGEMENT REVIEW [CHECK]**

Management Review is a key element of the ESMP Cycle (Figure 1), closing the adaptive management loop as part of the continual improvement process of the implemented management system (accredited to ISO 9001, ISO 14001 and OHSAS 18001).

BSOG and EPCIC Contractor management reviews are undertaken at several levels of the organization and include the following:

- BSOG performance reviews.
- EPCIC Contractor ESHS functional and project cross-functional reviews.
- Project management meetings.
- Weekly and monthly ESHS function meetings.

BSOG senior management periodically review the overall effectiveness of the ESHS management system, annually as a minimum. The scope of the ESHS Management Review include:

- Provide management with a summary of yearly ESHS performance, including:
  - Non-conformances and corrective actions
  - Monitoring and measurement results
  - Audit results
  - Stakeholder feedback and concerns (as resulting from the stakeholder engagement process)
  - Adequacy of ESHS resources
  - ESHS performance
  - ESHS incident trends, response and reporting.
- Identify opportunities for and drive continual improvement.
- Summarize the significant ESHS risks and envisaged risk management in the following period.

The annual ESHS Management Review will inform the annual ESHS planning and targets as well as any changes including resource needs.

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### **ATTACHMENT 1: RELEVANT LAWS AND REGULATIONS**

#### **NATIONAL LEGISLATION**

##### **Oil and Gas Legislation**

The main enactments governing oil and gas exploration and production in Romania are:

- Law No 256 of 2018 (Offshore Law) regarding certain measures required for the implementation of petroleum operations by the titleholders of petroleum agreements relating to offshore petroleum blocks;
- the Petroleum Law no. 238/2004;
- Government Decision no. 2075/2004 on the Methodological Norms of the application of the Petroleum Law;
- Law no. 123/2014 on electricity and natural gas; and
- Law no. 165/2016 on the safety of offshore petroleum operations, which transposes the EU Offshore Safety Directive 2013/30/EU.

##### **General Legislation**

- Law no. 50/1991 regarding the authorization of execution of construction works (Law no. 50/1991);
- Government Decision no. 839/2009 for the approval of the Methodological Norms of application of Law no. 50/1991;
- Law no. 350/2001 regarding territorial landscape and urbanism (Law no. 350/2001);
- Order no. 233/2016 for the approval of the Methodological Norms of application of Law no. 350/2001;
- Government Decision no. 525/1996 for the approval of the general urbanism regulation;
- Land Law no. 18/1991;
- Cadastre and Real Estate Publicity Law no. 7/1996;
- Order no. 700/2014 for the approval of the Regulation re the approval, acceptance and registration in the cadastre and land book inventory

##### **General Environmental Legislation**

- Law no. 6/1993 regarding the Romanian acceptance of the MARPOL Convention (73/78).
- Law no. 17/1990 on the judicial regime of internal waters, territorial sea, the contiguous zone and exclusive economic zone of Romania;
- Ordinance no. 18/2016 on the landscape of the spatial marine planning, which transposes Directive 2014/89/EU establishing a framework for maritime spatial planning;
- Emergency Government Ordinance no. 71/2010 on the establishment of the marine strategy framework - which transposes Marine Strategy Framework Directive 2008/56/EC;
- Emergency Government Ordinance no. 68/2007 concerning the environmental liability with respect to the prevention and repair of environmental damage, which transposes the Environmental Liability Directive 2004/35/EC;
- Emergency Government Ordinance no. 19/2006 regarding the use of the Black Sea's beaches and the control of activities performed on the beaches;
- Emergency Government Ordinance no. 195/2005 on environmental protection;

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- Emergency Government Ordinance no. 202/2002 regarding the integrated management of the coastal zone;
- Government Decision no. 445/2009 on environmental impact assessment pertaining to certain public and private projects (GD no. 445/2009) – which transposes the EIA Directive 85/337/EEC, the Directive 2003/35/EC providing for public participation in respect of the drawing up of certain plans and programmes relating to the environment and amending with regard to public participation and access to justice Council Directives 85/337/EEC and 96/61/EC and Directive 2009/31/EC on the geological storage of carbon dioxide;
- Government Decision no. 749/2004 regarding the responsibilities, criteria and method of delimitation of the land stripe located in the immediate proximity of the coastal area, for the purpose of preserving the ambient conditions and the patrimonial and landscaping value in the areas close to the shore;
- Government Decision no. 1232/2000 for the approval of the Methodological norms for the implementation of the International Convention on civil liability for oil pollution damage, 1992;
- Government Decision no. 62/1996 approving the list of investment and development objectives, as well as criteria for development, for which the General High Staff permit is mandatory;
- Order no. 2701/2010 approving the Methodology for the information and consultation of the public regarding the development or revising of the spatial planning of the territory and zoning plans;
- Order no. 135/2010 approving the Methodology for the application of the environmental impact assessment for public and private projects (Order no. 135/2010);
- Order no. 19/2010 approving the Methodological Guidelines regarding the appropriate assessment of potential effects of plans and programs upon protected natural areas of community importance;
- Government Decision no. 1076/2004 establishing the procedure for environmental assessment for plans and programs (GD no. 1076/2004), which transposes SEA Directive 2001/42/EC;
- Order no. 995/2006 approving the list of plans and programs subject to the provisions of GD no. 1076/2004;
- Order no. 863/2002 approving the Methodological guides applicable to the stages of the environmental impact assessment framework procedure, which contains the approved methodological guidelines applicable to the three key stages of the EIA framework procedure:
- Order no. 117/2006 approving the Guide regarding the applicability of the environmental assessment procedure for plans and programs;
- Order no. 756/1997 approving the Regulation on the assessment of environmental pollution;
- Order no. 536/1997 approving the Hygiene norms and recommendations on the living environment of the population;
- Government Decision no. 763/2015 approving the Plan of Management and associated Regulation of the Danube Delta Biosphere Reserve;
- Law no. 59/2016 on control of major accident hazards involving dangerous substances, transposing Directive 2012/18/EU on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC;
- Emergency Government Ordinance no. 196/2005 on the Environmental Fund;
- Government Decision no. 477/2009 establishing the applicable sanctions for failure to comply with the provisions of Regulation no. 1907/2006/EC concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals, establishing a European Chemicals Agency, amending Directive 1999/45/EC

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and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC;

- Order no. 1030/2009 on the approval of the regulatory health projects location, planning, construction and operation objectives that conducts health risk for the population;

### **Biodiversity and Protected Areas**

- Law no. 82/1993 on the establishment of the “Danube Delta” Biosphere Reserve;
- Government Decision no. 248/2004 for the adopting of certain measures for the application of Law no.82/1993 on the establishment of the “Danube Delta” Biosphere Reserve;
- Emergency Government Ordinance no. 57/2007 on the regime of protected natural areas, the preserve of natural habitats, wild flora and fauna – which transposes Directive 79/409/EEC on the conservation of wild birds, the Habitats Directive 92/43/EEC and Directive 2006/105/EC adapting Directives 73/239/EEC, 74/557/EEC and 2002/83/EC in the field of environment, by reason of the accession of Bulgaria and Romania;
- Government Decision no. 663/2016 setting up the protected natural areas and declaring special protection areas, as integral part of the European ecological network Natura 2000 in Romania;
- Government Decision no. 763/2015 approving the Plan of Management and associated Regulation of the Delta Danube Biosphere Reserve;
- Government Decision no. 1284/2007 regarding the institution of bird protection areas as integral part of Natura 2000 European ecological network in Romania – which transposes the Habitats Directive 92/43/EEC;
- Order no. 46/2016 establishing protected natural areas and declaring the sites of community importance as an integral part of the European ecological network Natura 2000 in Romania;
- Order no. 1964/2007 on the institution of the protected natural area regime for sites of community importance as integral part of Natura 2000 European ecological network in Romania, which transposes the Birds Directive 2009/147/EC;
- Law no. 5/2000 re the approval of the Spatial Planning of the National Territory – Section III – protected areas.

### **Emissions and Air Quality**

- Law no. 278/2013 on industrial emissions – which transposes the Industrial Emissions Directive 2010/75/EU;
- Emergency Government Ordinance no. 104/2001 on ambient air quality – which transposes the Ambient Air Quality Directive 2008/50/EC and Directive 2004/107/EC relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air;
- Government Decision no. 780/2006 establishing a scheme for greenhouse gas emission allowance trading – which transposes Directive 2003/87/EC establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC;
- Order no. 3420/2012 approving the Procedure for issuing the authorization for greenhouse gas emissions for 2013 – 2020;
- Order no. 462/1993 approving the Technical conditions for atmospheric protection and Methodological guidelines for determining atmospheric pollutants emissions from stationary sources;

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- Law no. 601/2012 on monitoring and greenhouse gas reporting under the EU Emissions Trading Scheme (ETS);

### **Water**

- Water Law no. 107/1996 – transposing Directive 2000/60/EC establishing a framework for Community action in the field of water policy and Directive 2007/60/EC on the assessment and management of flood risks;
- Law no. 458/2002 on the drinking water quality – which transposes Articles 9 and 15 of the Drinking Water Directive 98/83/EC;
- Emergency Government Ordinance no. 71/2010 on the set-up of the marine strategy framework – which transposes Marine Strategy Framework Directive 2008/56/EC;
- Governmental Decision no. 100/2002 approving the Quality norms of surface waters that are to be used for drinking and the Norms on the measurement methods and the frequency of sampling and assaying of the surface waters samples collected from waters;
- Order no. 662/2006 approving the Procedure and competencies for the issuance of water management permits and authorizations;
- Order no. 1406/2003 approving the Methodology for the quick assessment of environmental and human health hazards;
- Order no. 811/1999 approving the Notification procedure for the commissioning or operation of certain works located on water or related to water;
- Order no. 799/2012 re the approval of the normative for the content of technical documentation needed for obtaining water management permits and authorizations;
- Order no. 873/2012 for the approval of the notice Procedure from water management point of view;
- Order no. 15/2006 re the approval of the Procedure for the temporary suspension of the water management authorizations and of the Procedure for amending and withdrawal of water management permits and authorizations.

### **Soil / Contaminated Land**

- Government Decision no. 1408/2007 on the methods of investigation and assessment of soil and subsoil pollution;
- Government Decision no. 1403/2007 on the rehabilitation of the areas where the soil, subsoil and ecosystems were affected;

### **Noise (Airborne)**

- Government Decision no. 321/2005 in relation to the assessment and management of environmental noise – which transposes Environmental Noise Directive 2002/49/EC;

### **Wastes and Chemical Substances**

- Law no. 59/2016 on the control of major-accident hazards involving dangerous substances, which transposes Directive 2012/18/EU (the SEVESO III Directive);
- Law no. 249/2015 relating to packaging and packaging waste – which transposes Packaging and Packaging Waste Directive 94/62/EC;
- Law no. 211/2011 on waste regime – which transposes the Waste Framework Directive 2008/98/EC;
- Law no. 360/2003 in relation to waste and hazardous materials management;

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- Emergency Government Ordinance no. 196/2005 on the Environmental Fund;
- Government Decision no. 570 / 2016 regarding the approval of the Program for controlled elimination of evacuations, emissions and losses of priority dangerous substances and other measures concerning the main pollutants – which transposes Directive 2008/105/CE, Directive 2009/90/CE and Directive 2013/39/UE;
- Government Decision no. 477/2009 establishing the applicable sanctions for failure to comply with the provisions of Regulation no. 1907/2006/EC concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals, establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC;
- Government Decision no. 1061/2008 on the transport of hazardous and non-hazardous waste on the Romanian territory;
- Government Decision no. 235/2007 regarding management of waste oils;
- Government Decision no. 856/2002 on waste management evidence and approving the waste list, including hazardous waste;
- Order no. 1084/2003 approving the Notification procedures for activities posing major accident hazards involving dangerous substances and the respective major accidents;
- Order no. 757/2004 approving the Technical norms on waste storage;

## **Cultural Heritage**

- Law no. 442/2001 on the protection of historical monuments;
- Law no. 182/2000 on the protection of the national cultural movable heritage;
- Government Ordinance no. 43/2000 on the protection of the national cultural heritage and the declaration of some archaeological sites as of national interest;
- Government Ordinance no. 68/1994 on the protection of national cultural heritage;
- Order no. 2361/2010 approving the List of Historical Monuments 2010;
- Order no. 2562/2010 approving the Procedure for granting archaeological research authorizations;
- Order no. 2260/2008 approving the Methodological norms for classification and evidence of historical monuments;
- Order no. 2518/2007 approving the Methodology for enforcement of the archaeological discharge procedure;
- Order no. 2392/2004 regarding the Standards and procedures in archaeology;
- Order no. 2682/2003 approving the Methodological guidelines regarding the classification and recording of the historical monuments, the List of Historical Monuments, the Analytical record card for historical monuments and the Minimal record card for recording historical monuments;
- Ordinance no. 43/2000 on the protection of the archaeological heritage and declaring certain archaeological sites as national interest areas Ministry of Culture;
- Decision no. 2314/2004 re the approval of the list of historical monuments and missing monuments;

## **Transport**

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- Government Ordinance no. 43/1997 on roads regime;
- Government Ordinance no. 42/1997 on naval transport;
- Government Decision no. 245/2003 approving the Regulation for applying Government Ordinance no. 42/1997 on naval transport;

### **Health and Safety**

- Law no. 64/2008 on the safe operation of pressure vessels, lifting equipment and fuel-consuming devices;
- Law no. 319/2006 on safety and health at work, which transposes Directive 89/391/EEC on the introduction of measures to encourage improvements in the safety and health of workers at work;
- Law no. 307/2006 on fire safety;
- The Labour Code, approved by Law no. 53/2003;
- Government Decision no. 571/2016 approving the categories of buildings and facilities which are subject to endorsement and/or authorization for fire safety;
- Government Decision no. 1050/2006 on the minimum requirements for improving the safety and health protection of workers in the mineral-extracting industries through drilling - which transposes Directive 92/91/EEC concerning the minimum requirements for improving the safety and health protection of workers in the mineral-extracting industries through drilling;
- Government Decision no. 971/2006 on the minimum requirements for the provision of safety and/or health signs at work - which transposes Directive 92/58/EEC on the minimum requirements for the provision of safety and/or health signs at work;
- Government Decision no. 1091/2006 on the minimum safety and health requirements for the workplace - which transposes Directive 1989/654/EEC Directive 1989/654 concerning the minimum safety and health requirements for the workplace;
- Government Decision no. 1146/2006 on the minimum safety and health requirements for using work equipment, transposing Directive 1989/655/CEE on the minimum requirements for using work equipment by workers;
- Order no. 163/2007 approving the General fire safety norms;
- Government Decision no. 1425/2006 for approving the Methodological Norms for application of Law no. 319/2006;
- Government Decision no. 493/2006 on the minimum requirements for protection of safety and health protection of workers against hazards arisen from exposure to noise, transposing Directive 2003/10/CE concerning the minimum safety and health requirements for protection of workers exposed to noise;
- Government Decision no. 1048/2006 on the minimum requirements for personal protective equipment worn by workers, transposing Directive 89/656/CEE concerning the minimum safety and health requirements for using PPE by workers in the workplace;
- Government Decision no. 1058/2006 on the minimum requirements for health & safety of workers, working in potential explosive atmospheres, transposing Directive 1999/92/CE concerning minimum requirements for improving health and safety of workers exposed to potential explosive atmospheres;
- Government Decision no. 1028/2006 on the minimum requirements for health & safety of workers, working with Video Display Units (VDU), transposing Directive 90/270/CEE concerning minimum safety and health requirements for working with VDU;

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- Government Decision no. 1051/2006 on the minimum requirements for health & safety of workers involved in manual handling of loads, transposing Directive 90/269/CEE concerning minimum safety and health requirements for manual handling of loads;
- Government Decision no. 1093/2006 on the minimum requirements for health & safety protection of workers exposed to carcinogenic or mutagenic agents at workplace, transposing Directive 2004/37/CE concerning minimum safety and health requirements for workers exposed to carcinogenic or mutagenic agents at workplace;
- Government Decision no. 1218/2006 on the minimum requirements for health & safety protection of employees exposed to hazards arisen from chemical agents, transposing Directive 98/24/CE concerning protection of health and safety of workers exposed to chemical agents in the workplace;
- Government Decision no. 355/2007 regarding workers health surveillance;
- Order no.427/2002 regarding minimal First Aid Kit inventory for workplaces without specialized medical assistance;
- Order no. 3/2007 regarding approval of template for Reporting of LTI Incidents;
- Government Decision no. 600/2007 regarding protection of young employees against economic exploitation, transposing Directive 92/33/CE concerning protection of young employees at workplace;
- Order no. 242/2007 regarding nomination of H&S Coordinator during execution stage of projects using construction sites;
- Order no. 867/2007 regarding approval of Romanian standards list harmonized with European standards referring to pressurized equipment;
- Government Decision no. 557/2007 on the minimum requirements for health & safety protection of special types of employees (fixed term contract employees/ temporary employees hired via crewing agencies);
- Government Decision no. 300/2006 on the minimum health & safety requirements for temporary construction sites, transposed Directive 92/57/CEE concerning minimum health & safety requirements applicable to temporary or mobile construction sites;
- Government Emergency Decision no. 99/2000 regarding applicable control measures for health & safety protection of workers during periods of extreme weather conditions;
- Government Emergency Decision no. 96/2003 regarding protection of new and expectant mothers in the workplace, transposing Directive 92/85/CEE concerning protection of new or expectant mothers on the workplace;
- Government Decision no. 1876/2005 on the minimum health & safety protection of employees exposed to vibration, transposing Directive 2002/44/CE concerning minimum health and safety requirements applicable for workers exposed to risks generated by vibrations;
- Government Decision no. 115/2004 on establishing of essential PPE safety requirements and conditions for admittance on national market;
- INSEMEX Order no. 1636/2007 regarding rules for management of equipment which are working in potentially explosive atmospheres;
- INSEMEX Order no. 1637/2007 regarding general rules for management of search and rescue activities in companies with potential hazard of emission of noxious/ explosive/ flammable gases;
- INSEMEX Order no. 1638/2007 regarding rules for technical management of ventilation systems installed in potential explosive/toxic atmospheres;

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- ISCIR PT C4 – Technical Rules for control of pressurized storage vessels
- ISCIR PT C7 – Technical Rules for control of pressure safety devices
- ISCIR PT C6 – Technical Rules for pressurized metallic pipelines
- ISCIR PT R1 – Technical Rules for cranes and auxiliary lifting devices
- ISCIR PT R2 – Technical Rules for management of lifting devices
- ISCIR PT R4 – Technical Rules for self-elevating platforms

### **Accidental Releases**

- Government Decision no. 1593/2002 regarding the approval of the National preparation, response and cooperation plan in the event of oil pollution impacting the sea;
- Government Decision no. 1403/2007 regarding the reinstatement of areas where the soil, subsoil and terrestrial ecosystems have been affected.

## **APPLICABLE INTERNATIONAL LEGISLATION AND PROTOCOLS**

### **International conventions and protocols**

Romania has ratified both Aarhus and Espoo international conventions:

- United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters 1998, ratified by Law no. 86/2000 (Aarhus Convention);
- The 1991 UNECE Convention on Environmental Impact Assessment in a Transboundary Context, ratified by Law no. 22/2001 (Espoo Convention).

Compliance with public participation requirements defined by Aarhus Convention will be fully covered by MGD through the compliance with Romanian legislation and EBRD standards.

Additional international conventions that may also need to be accounted for comprise:

- Convention on the Protection of the Black Sea against Pollution, 1992, Bucharest, ratified by Law no. 98/1992 and related Black Sea Biodiversity and Landscape Conservation Protocol, ratified by Law no. 218/2011;
- IMO Convention for the Prevention of Pollution from Ships, 1973 and the Additional Protocol from 1978, ratified by Law no. 6/1993 (MARPOL 73/78);
- IMO Convention on Oil Pollution Preparedness, Response and Co-operation, 1990, ratified by Government Ordinance no. 14/2000 (OPRC Convention);
- International Convention on Civil Liability for Oil Pollution Damage, 1992, ratified by Government Ordinance no. 15/2000 (CLC Convention);
- European Convention on the Protection of the Archaeological Heritage, 1992, ratified by Law no. 150/1997 (La Valetta Convention);
- European Landscape Convention, 2000, ratified by Law no. 451/2002 (Florence Convention);
- Convention on the Conservation of European Wildlife and Natural Habitats, 1979, ratified by Law no. 13/1993 (Bern Convention);
- Convention on Biological Diversity, 1992, ratified by Law no. 58/1994 (CBD);

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- Convention on Conservation of Migratory Species of Wild Animals, 1979, ratified by Law no. 13/1998 (Bonn Convention);
- The Agreement on the Conservation of Cetaceans of the Black Sea, Mediterranean Sea and contiguous Atlantic area (ACCOBAMS), 2001, established under the auspices of the Bonn Convention (UNEP/CMS).

### **ILO Core Conventions**

- C029 - Forced Labour Convention, 1930 (No. 29) - 28 May 1957 / In Force;
- C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) - 28 May 1957 / In Force;
- C098 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98) - 26 Nov 1958 / In Force;
- C100 - Equal Remuneration Convention, 1951 (No. 100) - 28 May 1957 / In Force;
- C105 - Abolition of Forced Labour Convention, 1957 (No. 105) - 03 Aug 1998 / In Force;
- C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111) - 06 Jun 1973 / In Force;
- C138 - Minimum Age Convention, 1973 (No. 138) Minimum age specified: 16 years - 19 Nov 1975 / In Force;
- C182 - Worst Forms of Child Labour Convention, 1999 (No. 182) - 13 Dec 2000 / In Force.

### **EU Regulations**

The following EU Regulations are all directly applicable in Romania and will be adhered to by the project:

- Regulation (EU) No. 525/2013 on a mechanism for monitoring and reporting greenhouse gas emissions and for reporting other information at national and Union level relevant to climate change and repealing Decision No 280/2004/EC;
- Regulation (EU) No. 601/2012 on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council;
- Regulation (EC) no. 1272/2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) no. 1907/2006;
- Regulation (EC) no. 1907/2006 concerning the registration, evaluation, authorisation and restriction of chemicals, establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC (REACH);
- Regulation (EC) no. 166/2006 concerning the establishment of a European Pollutant Release and Transfer Register and amending Council Directives 91/689/EEC and 96/61/EC; and
- Regulation (EC) no. 850/2004 on persistent organic pollutants and amending Directive 79/117/EEC.

**ATTACHMENT 2: COMMITMENTS REGISTER**

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OFFSHORE COMMITMENTS REGISTER							Phase in the MGD Project lifecycle				
Number	ESIA Section	Topic	Action (English)	Responsible Party	Monitoring Indicators	Pre Construction	Drilling and Completion	Installation and Commissioning	Operations	Decommissioning	
1	8.1.4	Fish and Marine Mammals	The duration and amplitude of noise emissions during drilling and piling operations will be minimised as far as reasonably practicable to avoid or reduce the risk of potential injury or mortality to marine mammals or fish.	Drilling, Construction and Decommissioning Contractors	Any records of cetacean injury/fatality						
2	8.1.4	Fish and Marine Mammals	As far as possible and in accordance with the duration of the offshore Environmental Permit, construction piling or decommissioning activities using explosives will take place during the period when there is minimal marine mammal or other marine fauna presence within the project area (i.e. during the winter months).	Construction and Decommissioning Contractors	Activity Schedule						
3	8.1.4	Fish and Marine Mammals	To minimise the impacts of noise on marine mammals, an accredited Marine Mammal Observer (MMO) will be employed to check for the presence of marine mammals within a 500 m monitoring zone around the noise source for 30 mins before hammer piling activities commence. If any marine mammals are detected within the monitoring zone prior to the start of operations, piling operations will not start until the MMO confirms that the cetaceans have moved out of the 500 m zone. These procedures will also be applied if there is a pause in piling operations for a period of more than 10 minutes, unless a continuous watch has been kept and the MMO can confirm the absence of any marine mammals within the 500 m monitoring zone.	Construction Contractors	MMO Report						
4	8.1.4	Fish and Marine Mammals	As far as possible, hammer piling activities will be started during daylight hours. In the event of adverse weather / sea state conditions that prevent visual detection of marine mammals, Passive Acoustic Monitoring (PAM) will be undertaken, if available, to help identify when marine mammals are present within the 500 m monitoring zone and to inform the need to delay the start of piling operations as described in the item 3 above.	Construction Contractors	MMO Report						
5	8.1.4	Fish and Marine Mammals	A "soft-start" procedure will be implemented for piling operations in which the amplitude of the noise emission is gradually increased in accordance with a procedure to be prepared.	Construction Contractor	MMO Report						
6	8.1.4	Fish and Marine Mammals	Pipeline installation methods will aim to reduce the use of anchors, where feasible, to ensure minimal impacts to benthic species, demersal fish and their habitats.	Offshore Construction Contractors	Method statement / Inspection records						
7	8.1.4	Fish and Marine Mammals	International / regional project vessels will comply with IMO Ballast Water Management and biofouling / Romanian Environmental Permit requirements to avoid the introduction of invasive species.	Rig Manager and Vessel Masters	Inspection records / Antifouling and Ballast Water records						

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8	8.2.4	Birds	Lighting on the Ana wellhead platform will be reduced to levels required for safe and secure operations.	BSOG	Inspection records						
9	8.3.4	Air Quality	The jack-up drilling rig will comply with the relevant IMO atmospheric emissions standards / Romanian Environmental Permit requirements to operate in the Black Sea (Midia area).	Drilling Contractor	Vessel assurance records						
10	8.3.4	Air Quality	In accordance with IMO emissions requirements and the 2020 implementation date, all fuel will have a low sulphur content.	BSOG and Offshore Contractors	Vessel assurance records						
11	8.3.4	Air Quality	In accordance with Romanian Environmental Permit requirements, all emissions, including greenhouse gas emissions, will be quantified and assessed in the environmental impact report and in subsequent annual performance reports.	BSOG and Contractors	Annual GHG inventory						
12	8.3.4	Air Quality	BSOG subcontractors are expected to apply good industry practice to reduce atmospheric emissions and meet regulatory / EP standards.	BSOG and Contractors	Contract specifications						
13	8.3.4	Air Quality	Construction activities will use newer vessels with lower emissions where possible (e.g. where such resources are available within regional fleets).	Offshore contractors	Inspection records						
14	8.3.4	Air Quality	The project will develop and implement Best Available Technology strategies for the extraction of natural gas in the Black Sea. This is undertaken during FEED and included reviewing project design, and optimising equipment efficiency and dimensioning.	BSOG and Offshore Contractors	Project Designs						
15	8.4.4	Water Quality	Vessels will be compliant with national and international pollution legislation. Vessels shall maintain: - Ballast Water Management Plans; - Bunkering Procedures; - Garbage Management Plans/Waste Management Plans; - Sewage Management Plan; - Shipboard Energy Efficiency Management Plans (SEEMPs); and - Shipboard Oil Pollution Emergency Plans (SOPEPs).	BSOG and Offshore Contractors	IMO-required Certificates and management plans for oil pollution, sewage and air pollution prevention / Inspection records						
16	8.4.4	Water Quality	A contingency plan as defined in the vessel's SOPEP or equivalent ERP and in national legislation will be implemented if an accidental pollution incident occurs.	BSOG and Offshore Contractors	Shipboard Oil Pollution Emergency Plans / Incident and inspection records						
17	8.4.4	Water Quality	The project will be compliant with legal regulations on ship ballast water.	BSOG and Offshore Contractors	Ballast Water Management Plans / Inspection records						

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18	8.5.4	Seabed Sediments and Features	Simultaneous Installation and Operation Procedures (SIMOPS) will be employed to reduce the potential occurrence of fallen objects.	BSOG and Offshore Contractors	Dropped Objects Procedure / Incident and inspection records				
19	8.5.4	Seabed Sediments and Features	All members of the offshore workforce will attend courses / view presentations to raise awareness of the issue of fallen objects. They will also implement procedures to reduce the risk of abandoned objects and promote good on-board maintenance of equipment, tools and building materials, such as safe storage of deck elements.	Offshore Contractors	Training Records / Dropped Objects Procedure / Incident records				
20	8.5.4	Seabed Sediments and Features	Height planning will be undertaken to manage risks associated with lifting activities. Consideration will be given to prevailing environmental conditions and the use of specialized equipment where appropriate. All lifting equipment will be tested and certified.	Offshore Contractors	Certified lifting equipment / Incident records				
21	8.5.4	Seabed Sediments and Features	Procedures will be established to record the location of any lost material lost overboard and to recover items where possible.	Offshore Contractors	Dropped Objects Procedure / Incident records				
22	8.5.4	Seabed Sediments and Features	Drilling platform jacket total surface area will be calculated to identify the impact region. As well, anchorages will be limited to the 500 m interaction zone.	Drilling Contractor	Dropped Objects Procedure / Incident and inspection records				
23	BMP 6.2.3	Benthic Habitats	During the detailed design stage, the infield pipeline route will be microsited to avoid sensitive carbonate concretions and bacterial mats habitats identified during baseline surveys.	Pipeline Construction Contractors	Drop down video. Microsited pipeline route				
23	8.6.4	Waste Generation	Wastewater from vessels will be discharged to the sea only if it has a hydrocarbon concentration below 15 ppm and satisfies the requirements of the EP and the Water Management Permit (WMP).	BSOG and Offshore Contractors	Waste Management Plan / Inspection records				
24	8.6.4	Waste Generation	All fuels, oils and hazardous chemical substances will be stored in tanks and in sealed containers provided with retention basins so that no leakage can occur.	Offshore Contractors	Waste Management Plan / Inspection records				
25	8.6.4	Waste Generation	All used oil will be collected in special purpose-built containers and subsequently handed over to onshore hazardous waste authorities.	Offshore Contractors	Waste Management Plan / Inspection records				

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26	8.7.4	Risk of Accidental Releases	The project will develop and implement protocols to prevent and control accidental spills and pollution events.	BSOG and Offshore Contractors	Spill/Emergency Response Plans / Incident records				
27	8.7.4	Risk of Accidental Releases	If an accidental spill or pollution event occurs, immediate mitigation measures will be implemented to limit the scale and impact of the pollution. BSOG and all relevant authorities will be immediately notified and kept informed as to incident evolution and the status of intervention measures as per legal requirements.	BSOG and Offshore Contractors	Spill/Emergency Response Plans / Incident records				
28	8.7.4	Risk of Accidental Releases	The project will follow the recognised design guidelines, which will include mitigation measures to reduce accidental gas leakage.	BSOG and Offshore Contractors	Spill/Emergency Response Plans / Incident records				
29	8.7.4	Risk of Accidental Releases	Equipment and machinery will be maintained to avoid fuel and oil leakage.	Offshore Contractors	Inspection and incident records				
30	10,1	Fisheries	A Stakeholder Engagement Plan will be developed. It will include: <ul style="list-style-type: none"> <li>- Clear communication with the authorities and, if possible, directly with the owners of fishing ships operating in this area will be established. Alternative routing for the ships will be provided so that extra expenses are reduced to minimum.</li> <li>- Sending notifications to all the appropriate shipping journals and charts, ensuring all navigational aids are in place and used/maintained appropriately.</li> <li>- Information will be disseminated at the local level, informing all owners of fishing boats (formal and informal) regarding the planned corridor of works and the period of restrictions imposed.</li> <li>- If possible, advising owners / crews of fishing boats of the risks and potential consequences of anchor/net entanglements or other interaction with project equipment</li> </ul>	BSOG	Stakeholder Engagement Plan and records				
31	10,1	Fisheries	Safety exclusion zones will be established around construction vessels and the drilling rig, and around seabed infrastructure once installed. In addition, if possible, subsea structures will be designed to be 'fishing friendly' (over-trawlable).	BSOG	Ministry Authorisation, Notice to Mariners and updates to navigation charts				
32	10,2	Shipping	The project will cooperate with the Romanian Naval Authorities in defining the permit conditions for navigation safety and establishing exclusion areas around the subsea infrastructure by BSOG and by the Marine Hydro-graphic Directorate.  Notifications will be sent to all the appropriate shipping journals and charts, ensuring all navigational aids are in place and used/maintained appropriately, the establishment of safety exclusion zones around construction vessels and the drilling rig, and around seabed infrastructure once installed.	BSOG	Ministry Authorisation, Notice to Mariners and updates to navigation charts				
33	10,3	Other Sea Users	A stakeholder Engagement Plan will be developed to indicate engagement needs with other sea users and updated as necessary.	BSOG	Stakeholder Engagement Plan and records				

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34	10,3	Other Sea Users	Magnetic contacts that can potentially be UXO have been identified in the vicinity of the project. BSOG will notify and partner with the General Highstaff of the Navy to organise a survey. UXO will be removed if confirmed as present within the area affected by construction works, and it is safe to do so. (Currently, BSOG is awaiting the report of the ROV survey on the surface metallic object identified)	BSOG	UXO Survey Report and any consequent actions					
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Number	ESIA Section	Topic	Action (English)	Responsible Party	Monitoring Indicators	Pre Construction	Construction and Commissioning	Operations	Decommissioning
1	9.1.4	Air Quality and Greenhouse Gas Footprint	Emissions of dust and suspended particles <del>solids</del> resulting from onshore operations (e.g. drilling, excavations, trenching, compacting, loading-unloading) will be reduced where possible by applying appropriate technology and contractor good practice to ensure compliance with ES permit requirements and, if applicable, the provisions of STAS 12574-87 (Air in the protected area. Quality conditions).	BSOG and Contractors	Permit compliance / Community complaints				
2	9.1.4	Air Quality and Greenhouse Gas Footprint	In accordance with permit requirements, all emissions, including greenhouse gas emissions, will be quantified and assessed in the environmental impact report and in subsequent annual performance reports	BSOG and Contractors	Annual GHG inventory				
3	9.1.4	Air Quality and Greenhouse Gas Footprint	BSOG subcontractors will be required to reduce atmospheric emissions through the use of appropriate equipment and good management practice.	BSOG and Contractors	Contract specifications				
4	9.1.4	Air Quality and Greenhouse Gas Footprint	Appropriate construction equipment will be used and machinery will undergo routine maintenance and periodic technical inspections to ensure compliance with legal and permit emissions standards.	Contractors	Inspection records				
5	9.1.4	Air Quality and Greenhouse Gas Footprint	Atmospheric emissions will be reduced through the appropriate maintenance of vehicles and mobile equipment and restricting idle running.	Contractors	Inspection records				
6	9.1.4	Air Quality and Greenhouse Gas Footprint	Loose materials (such as soils, aggregates and vegetation) will be transported by vehicles with canvass covers to minimise community disturbance. <del>and</del> Vehicles transporting materials will only use designated routes.	Contractors	Community complaints				
7	9.1.4	Air Quality and Greenhouse Gas Footprint	All vehicles, machines and equipment will only be replenished with fuel <del>only</del> within the designated fuel-supply area set up for this purpose within the site management area.	Contractors	Inspection records				
8	9.1.4	Air Quality and Greenhouse Gas Footprint	Site / site access road speed limits will be imposed to reduce the level of dust generated by moving vehicles: e.g. 5-15 km/h during construction and 20 km/h during operation. Vehicles will observe speed limits on all public roads.	BSOG and Contractors	Community complaints				

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9	9.1.4	Air Quality and Greenhouse Gas Footprint	The GTP will be designed to comply with applicable legal/permit air quality and emission standards, including the use of any stipulated instrument monitoring systems or independent, certified laboratory sampling and analysis as appropriate. If required by the Environmental Permit, monitoring stations will be installed to measure pollution within/around the project area (e.g. passive directional or depositional monitoring of particulate levels during construction).	BSOG	Permit compliance / AQ monitoring records				
10	9.2.4	Biodiversity Features	In accordance with applicable legal/permit requirements, it is strictly forbidden to undertake any of the following actions to prevent any harm to species of flora or fauna (except for bird species - see next item): <ul style="list-style-type: none"> <li>• Any type of gathering, capturing, killing, destroying or causing injury to such species in their natural environment, at any stage of the biological cycle;</li> <li>• Deliberate disturbance during reproduction, development, hibernation and migration;</li> <li>• Damaging and/or destroying places for reproduction or for rest;</li> <li>• Uncontrolled storage of waste resulting from administrative functions and from specific activities. It is mandatory to arrange a special place for waste storage and to ensure its transportation as soon as possible, so that it does not endanger the wildlife in the area.</li> </ul>	BSOG and Contractors	Biodiversity Action Plan				
11	9.2.4	Biodiversity Features	For all bird species, the following actions are forbidden: <ul style="list-style-type: none"> <li>• Deliberately killing or capturing birds, regardless of the method;</li> <li>• Deliberately damaging, destroying and/or gathering nests and/or eggs;</li> <li>• Deliberate disturbance, especially during reproduction, breeding and migration periods;</li> <li>• Owning individuals of the species for which hunting and capturing are forbidden;</li> <li>• Trading, owning and/or transporting live or dead birds or any easily identifiable parts or production order to be traded.</li> </ul>	BSOG and Contractors	Biodiversity Action Plan				
12	9.2.4	Biodiversity Features	As per permit requirements, an external biodiversity expert will be appointed to train the personnel performing activities within the Project area in order to ensure minimal impact upon biodiversity and to ensure informed monitoring of activities. This person will be notified by the site management team whenever specimens of the specific fauna/flora (i.e. protected or endangered species) are located-in the area and will temporarily relocate or otherwise ensure adequate protection of the identified specimens from the designated working area. BSOG must record details about the actions performed in order to demonstrate limited impact upon biodiversity (date, species, measures that were implemented, means that were used). These records will be made available to EPA Constanta, upon reasonable request.	BSOG and external expert	Biodiversity Action Plan				
13	9.2.4	Biodiversity Features	To minimise any impacts on the European ground squirrel ( <i>Spermophilus citellus</i> ): <ul style="list-style-type: none"> <li>- Delimitation of the implementation area for the GTP by small mammal/reptile fences made of thick netting or plastic sheeting and relocation of the individuals that use this area (if applicable).</li> <li>- The PP implementation area for the PP will affect a surface as small as possible and it will not exceed the PP perimeter.</li> <li>- Keeping and using the surface soil layer (first 30 cm); it will be separately stored in a specially designated area and it will be covered by protective sheets of dark colour that will prevent wind-generated erosion and growth of invasive plant species on its surface.</li> <li>- Imposing speed limits in order to observe and avoid accidents/injuries involving individual animals;</li> <li>- Observing the provisions of GEO no. 57/2007.</li> </ul>	BSOG and external expert	Biodiversity Action Plan				

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14	9.2.4	Biodiversity Features	<p>For the minimisation of population level impacts to the following fauna species: Bombina bombina, Testudo graeca, Emys orbicularis, Pelobates syriacus, Hyla arborea, Lacerta trilineata, Natrix tessellata, Dolichophis caspius:</p> <ul style="list-style-type: none"> <li>- Ideally, the Section 1 buried pipeline works should be surveyed-during the end of September/ beginning of October when a aquatic species will be concentrated in permanent water habitats and terrestrial species will be still active so they can disperse in case of danger. If this period is not feasible or at odds with specified permit duration, additional effort will be applied to the following practical mitigation measures.</li> <li>- The PP GTP implementation area should be surveyed before commencement of works in order to identify and relocate any specimens at potential risk. The area will then be isolated by small mamma/reptile net fences to prevent individuals from re-entering the area. Site delimitation using net fences will be performed in stages, in parallel with the installation works to reduce habitat fragmentation to short lengths of the easement and for short time spans;</li> <li>- The site management and excavation activities should be designed to affect a surface as small as possible;</li> <li>- Keeping and using the surface soil layer (first 30 cm) in good condition for use in site reinstatement;</li> <li>- Imposing speed limits in order to observe and avoid accidents/injuries involving individual animals;</li> <li>- Observing legal and permit requirements.</li> <li>- At the end of the works for the section of below ground pipeline, the original configuration of the micro-relief should be reinstated. In this way, the floodable areas will be kept and they will serve as breeding habitat for amphibians.</li> </ul>	BSOG and external expert	Biodiversity Action Plan				
15	9.2.4	Biodiversity Features	<p>To minimise the potential impacts to Eurasian otters (Lutra lutra): - Delimiting the working corridor of the pipeline section I by installing thick wire fences to prevent the animals from entering the working area to cross from one pool to another. Delimitation using wire fences will be performed stage by stage, in parallel with the works, to reduce habitat fragmentation to short lengths of the easement and for short time spans.- The excavations and the working corridor for Section I of the pipeline should be designed to affect a surface area that is as small as possible.- Keeping and re-using the top soil layer for reinstatement to favour the rapid growth of the characteristic vegetation, an important component of the habitats that are favourable to native species.- Observing legal and permit requirements.</p>	BSOG and external expert	Biodiversity Action Plan				

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16	9.2.4	Biodiversity Features	<p>To minimise potential impacts to bird species of community importance:</p> <ul style="list-style-type: none"> <li>- Ideally, performing the Section I pipeline works outside of the reproduction season of birds (e.g. 31.03 through to 15.08 – 31.03). This is considered optimal as birds have finished breeding and migrant species will leave the area. At other times of the year, birds can easily avoid the PP area moving north or south to similar habitats with open areas that can provide food and shelter. If this period is not feasible or at odds with specified permit duration, additional effort will be applied to the following practical mitigation measures.</li> <li>- The likely presence of red-footed falcons (<i>Falco vespertinus</i>), which are connected to local Corvidae species (e.g. hooded crow, rook etc.) as the falcons use abandoned Corvidae nests located in the acacia plantation, means that it is strictly forbidden to kill, capture or disturb any falcons or deliberately damage, destroy and/or collect nests and/or eggs of falcon or Corvidae species.</li> <li>- The PP implementation area should be surveyed before commencing works in order to relocate the specimens found outside this area before the activities start.</li> <li>- Training a designated person from the team of the Constructor's workers, who should investigate the PP implementation area in order to relocate the specimens.</li> <li>- Observing legal and permitting requirements.</li> <li>- The designated perimeter of the implementation area of GTP will not be exceeded and no intervention will be made under any circumstance in the acacia plantation in the Plant's eastern area.</li> <li>- Along the GTP perimeter, there will be a buffer/barrier made up of grassy vegetation, mature trees and native scrubs (e.g.: <i>Crategus monogyna</i>, <i>Fraxinus ornus</i>, <i>Salix sp.</i>, <i>Tilia sp.</i> etc.), having a few meters width, in order to reduce noise and vibrations generated by the GTP during operations.</li> <li>- No raw materials/waste will be stored in the acacia plantation in the eastern part of the GTP site</li> <li>- Planning - as far as realistically practicable - construction activities, which have a disturbing impact in terms of noise and vibrations, to avoid the immediate vicinity of the acacia plantation between April 20th and September 15th (e.g. building the retention basin located in the eastern part of the site and installing the chimney).</li> </ul>	BSOG and external expert	Biodiversity Action Plan				
17	9.2.4	Biodiversity Features	The use of insecticides and pesticides on the PP surface is forbidden; however, rodenticides and traps may be used during operational phase to control vermin and protect assets.	BSOG	Inspection records				
18	9.2.4	Biodiversity Features	Avoid working at night during construction works. If light is used at night, excess use will be avoided and the light sources will be directed into the site management area and shadowed by matt screens to minimise illumination of external areas. During operations, site lighting will be required and will be mitigated as described.	BSOG and Contractors	Inspection records				
19	9.2.4	Biodiversity Features	No species of moth ( <i>Catopta thrips</i> ) attracted by the light associated with works during construction/operation stage will be captured/killed.	Contractors	Inspection records				
20	9.2.4	Biodiversity Features	The activities for transporting materials will be planned so that the vehicles limit their trips to the minimum necessary for works performance.	Contractors	Inspection records				
21	BMP - 6.2.3	Biodiversity Features - Habitats and Flora	Ground levelling activities will be limited, in order to preserve as far as possible the local topographic features, which have an important role in ensuring some wet habitats (especially temporarily flooded areas) for certain species of community importance. The landscape and landforms presented prior to construction will be re-instated following construction in line with the Soil, Waterbody Crossing and Reinstatement Management Plan.	BSOG and Contractors	Soil, Waterbody Crossing and Reinstatement Management Plan				

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22	BMP - 6.2.3	Biodiversity Features - Habitats and Flora	Minimising the footprint of the works as far as is practicable. Minimising the soil storage footprint as far as practicable whilst meeting the requirements of the Soil, Waterbody Crossing and Reinstatement Management Plan.	BSOG and Contractors	Soil, Waterbody Crossing and Reinstatement Management Plan				
23	BMP - 6.2.3	Biodiversity Features - Habitats and Flora	Removal of turfs and the top most soil layer and depositing it separately from the filling soil in order to be reinstated for the revegetation of the habitat surfaces affected by pipeline installation.	BSOG and Contractors	Soil, Waterbody Crossing and Reinstatement Management Plan				
24	BMP - 6.2.3	Biodiversity Features - Habitats and Flora	Covering the turfs and top soil in order to prevent erosion and wind blow that can affect it and that can reduce the number of seeds and bulbs available for revegetation.	BSOG and Contractors	Soil, Waterbody Crossing and Reinstatement Management Plan				
25	BMP - 6.2.3	Biodiversity Features - Habitats and Flora	The habitat surface affected by works will be revegetated using exclusively seeds and bulbs preserved in the vegetal soil layer that was removed and stored separately; the voluntary or accidental use of species that are not native will be avoided under any situation.	BSOG and Contractors	Soil, Waterbody Crossing and Reinstatement Management Plan				
26	BMP - 6.2.3	Biodiversity Features - Habitats and Flora	All habitats will be reinstated in line with the Soil, Waterbody Crossing and Reinstatement Management Plan and the vegetation re-instatement method statement.	BSOG and Contractors	Soil, Waterbody Crossing and Reinstatement Management Plan				
27	BMP - 6.2.3	Biodiversity Features - Habitats and Flora	The open cut trench pipeline installation through land plots 4-7 will be microsited to reduce impacts on habitats which will take longer to re-instate or recover from temporary disturbance. Micrositing will be informed by walk over surveys prior to detailed design stage.	BSOG and Contractors	Refined pipeline route				
28	BMP - 6.2.3	Biodiversity Features - Habitats and Flora	Access tracks will be sited on existing dirt roads where ever possible. Access tracks will be constructed as soon as possible and tracking of vehicles on site will be avoided outwith these roads, so that adjacent vegetation and sand dune structure is left undisturbed and uncompacted as far as possible.	BSOG and Contractors	Photographic evidence and reporting of implementation of measures.				
29	BMP - 6.2.3	Biodiversity Features - Habitats and Flora	Along sections of access tracks and the pipeline working strip which have fragile soil structure or have waterlogged or wet soils, ground protection will be installed to protect the soil from damage by vehicle movement (measures may include choir matting, temporary plastic road surfaces or temporary log roads). The habitats lost in construction areas will be progressively restored to minimise the time between habitat loss and restoration.	BSOG and Contractors	Photographic evidence and reporting of implementation of measures.				

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30	BMP - 6.2.3	Biodiversity Features - Flora species Artemisia tschernieviana Crambe maritima (sea kale) Dianthus bessarabicus Eryngium maritimum (sea holly) Elymus farctus ssp. Bessarabicus	<ul style="list-style-type: none"> <li>■ To minimise impacts on national Endangered and Critically Endangered plant species the following measures will be implemented: <ul style="list-style-type: none"> <li>■ Check surveys will be undertaken of the temporary project footprint prior to construction to identify individuals of Endangered and Critically Endangered plant species.</li> <li>■ Individuals found will be translocated to suitable receptor sites prior to construction, in line with the flora translocation method statement.</li> </ul> </li> </ul>	BSOG and Contractors	Development and implementation of flora translocation method statement. Photographic evidence and reporting of implementation of measures.				
31	BMP - 6.2.3	Biodiversity Features - Invasive Species	<ul style="list-style-type: none"> <li>■ All vehicles will be washed and have wheels and wheel arches cleaned prior to being mobilised to site (e.g at equipment yards).</li> </ul>	Contractors	Vehicle inspection records.				
32	BMP - 6.2.3	Biodiversity Features - Invasive Species	<ul style="list-style-type: none"> <li>■ Cattle grids will be installed at the start of all access tracks leading into the Danube Delta designated sites to help prevent the spread of invasive species (e.g Robinia pseudacacia) as seeds, or viable vegetative material into sensitive habitats.</li> </ul>	Contractors	Construction of cattle grids.				
33	BMP - 6.2.3	Biodiversity Features - Invasive Species	<ul style="list-style-type: none"> <li>■ Ongoing monitoring and maintenance of the Project wayleave will include the selective removal of invasive species from the Project footprint.</li> </ul>	Contractors	Monitoring of invasive species.				
21	9.3.4	Soil Quality and Geology	Reinstating the fertile top soil layer in areas where soil was affected by excavations, storage of materials, parking of machinery/vehicles.	Contractors	Inspection records				
22	9.4.4	Hydrology and Hydrogeology	Special measures shall be taken to protect the quality of the groundwater bodies located on the site of the gas treatment plant and the surface water bodies crossed by the onshore segment of the upstream supply pipeline; the measures will be stipulated in the water management permits to be sent by the "Romanian Waters" National Administration	BSOG and Contractors	Permit compliance				
23	9.4.4	Hydrology and Hydrogeology	Appropriate handling of the substances used for maintenance activities, observing the optimal dose of substances in order to avoid accidental leakage on soil surface or into water bodies	Contractors	Inspection records				
24	9.4.4	Hydrology and Hydrogeology	Hydrogeology will be changed due to the installation of concrete surfaces. Drainage system will be put in place for GTP site.  Note that there is a possibility of some temporary flooding in the area so BSOG will either schedule construction during dryer periods if feasible and/or ensure that the working area is managed to prevent loss or damage to materials and works and avoid delays.	BSOG and Contractors	Inspection records				
25	9.5.4	Landscape	The Contractor will be bound by contract to adopt a best management practices in construction works and site management in order to avoid any significant visual impact or significant impact upon the landscape.	Contractors	Inspection records				

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26	9.5.4	Landscape	Along the GTP perimeter, there will be constructed a buffer - barrier made up of grassy vegetation, mature trees and native scrubs (e.g.: Crategus monogyna, Fraxinus ornus, Salix sp., Tilia sp. etc.) having a width of a few meters in order to screen the facility and reduce the impact upon the landscape.	Contractors	Inspection records			
27	9.5.4	Landscape	Careful selection of the types of light sources and installation of are lighting systems so that the pollution caused by light will not disturb sensitive receptors identified in the PP vicinity.	Contractors	Inspection records			
28	9.5.4	Landscape	If feasible, the pipeline installation works should be performed after the seeds of the important plant species fructify and become mature, more precisely after the second half of August. If this is not feasible, BSOG will explore alternative means of obtaining seeds/seedlings of local floral species for use in site reinstatement.	BSOG and Contractors	Inspection records			
29	9.5.4	Landscape	Lowering of excavated surfaces, earthworks and surfaces covered by excavated soil.	Contractors	Inspection records			
30	9.5.4	Landscape	Removal of the vegetal soil layer and its storage separately from backfill soil/materials so that it can be used for the revegetation of the habitats affected by pipeline installation;	Contractors	Inspection records			
31	9.5.4	Landscape	Covering the vegetal soil layer in order to prevent the erosion and transportation processes that can degrade soil quality and that can reduce the number of seeds and bulbs available for revegetation.	Contractors	Inspection records			
32	9.5.4	Landscape	The habitat surface affected by works will be revegetated using exclusively seeds and bulbs that are removed and stored separately; the voluntary or accidental use of species that are not native will be avoided under any situation.	Contractors	Inspection records			
33	9.5.4	Landscape	Ground levelling activities will be limited, in order to preserve as far as possible the local topographic features, which have an important role in ensuring some wet habitats (especially temporarily flooded areas) for certain species of community importance (e.g. amphibians).	Contractors	Inspection records			
34	9.6.4	Noise and Vibration	Using silencers and noise screens for equipment such as compressors, gas turbines, generators, pumps etc. in order to reduce noise levels; Installing noise absorbing panels if, after installing and testing the actual Plant machinery, noise levels exceed the values specified by legislation.	Contractors	Community complaints			
35	9.6.4	Noise and Vibration	Disturbance impacts caused by noise, light and vibrations upon the species of community importance will be short (approximately 3 months). This could be higher if the works take place in the spring-summer season, when reproduction takes place for most faunal species identified on site. However, some level of disturbance is inevitable but the above mentioned mitigation measures proposed for impacts to Biodiversity Features will help minimise effects on wildlife.	Contractors	Inspection records			
36	9.7.4	Waste Generation	Ban on storing materials, waste or vehicle parking/washing machinery in areas which are not specifically designed for these activities	Contractors	Inspection records			
37	9.7.4	Waste Generation	The wastewaters arising from cleaning or washing vehicles and construction equipment will be collected in tanks and disposed of via the septic truck; Discharge of wastewater, residues or other waste into groundwater or into surface water will be avoided.	Contractors	Inspection records			
38	9.7.4	Waste Generation	Strict management of all types of generated waste, including appropriate segregation, storage and handling on site, followed by collection and waste recycling/disposal by authorized operators.	Contractors	Inspection records			
39	9.7.4	Waste Generation	No raw materials/wastes will be stored in the acacia plantation in the eastern part of the GTP site	Contractors	Inspection records			

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40	9.7.4	Waste Generation	Uncontrolled storage of wastes arising from administrative functions and from specific works activities. It is mandatory to arrange a special place for waste storage and to ensure its transportation as soon as possible, so that it does not endanger the birds in the area or attract vermin.	BSOG and Contractors	Inspection records					
41	11,1	Land Usage and Infrastructure	A limited transportation study will be carried out to determine the level of potential impacts on local infrastructure (e.g. route points that may offer manoeuvring challenges for abnormal roads or result in excessive congestion or disturbance along the route) to facilitate transport planning. BSOG and contractors will monitor such impacts as appropriate	BSOG and external expert	Study report					
42	11,1	Land Usage and Infrastructure	The construction works will not obstruct access to private land plots. In the unlikely event of alternative access becoming necessary during construction work (e.g. to assemble all required equipment needed to effect the beach crossing), BSOG and the contractors will engage with the relevant contractors to identify and agree a suitable solution.	BSOG and Contractors	Land-owner agreement					
43	11,1	Land Usage and Infrastructure	Planned schedule of works and convoy / abnormal load movements will be notified to the local community and local authorities in advance.	BSOG	Stakeholder Engagement Plan					
44	11,1	Land Usage and Infrastructure	All roads will be reinstated to pre-intervention condition.	BSOG	Inspection records					
45	11,1	Land Usage and Infrastructure	Wherever possible, transportation on public-roads will be scheduled outside of peak-hours to avoid times when schoolchildren may be present (e.g. cycling, walking or being bussed to and from Corbu secondary school and Vadu).	Contractors	Community complaints					
46	11,1	Land Usage and Infrastructure	The project will seek to ensure the presence of a police crew to address possible road congestion or other traffic problems as identified in Item no. 43 above.	BSOG	Community complaints					
47	11,1	Land Usage and Infrastructure	Where possible, Project transport will avoid conflicts with the local bus schedule. When unable to avoid significant disturbances to the bus schedule, it may <del>will</del> be adapted and local communities will be informed about temporary schedule changes or disruptions.	BSOG and Contractors	Transport and Stakeholder Engagement Plans					
48	11,1	Land Usage and Infrastructure	Road quality will be assessed prior to the start of works; if necessary, minor improvements will be implemented to improve accessibility for project vehicles/abnormal loads and/or enhance road safety (e.g. installation of better signage, clearance of vegetation / obstructions, reinstatement of potholes). Any road damage resulting from the usage of road by machinery and equipment will be addressed by BSOG.	BSOG	Roads Assessment Report					
49	11,1	Land Usage and Infrastructure	In the unlikely situation where crops are affected by construction works, BSOG will address the situation directly with the affected party. BSOG will also make contractors responsible for compensating affected parties in case such situations arise. BSOG will properly monitor the implementation of any works to remediate damage and the compensation mechanism adopted by the contractors.	BSOG and Contractors	Community complaints					
50	11,1	Land Usage and Infrastructure	BSOG will implement a grievance mechanism to enable affected parties to file an official complaint.	BSOG	Grievance System					
51	11,1	Land Usage and Infrastructure	Direct settlement with the affected party on type and amount of compensations to be provided. In this case, a right of use for the affected land should be signed with the owner of the affected land plot. In such case direct settlement should be reached with the affected party. BSOG will undertake a case by case analysis of settlements, and proper compensations will be provided to land owners if a decrease in property value is proven to have resulted from project works.	BSOG	Community complaints					

### Environmental and Social Management Plan for MGD Project

52	11,2	Community and Local Economic Activities	As far as reasonably practicable, project transport will not pass close to the restaurant on Vadu Beach, particularly at peak serving times during the tourist season. If alternative routes cannot be used, BSOG and contractors will liaise with the restaurant management to minimise disturbance to its clientele.	BSOG and Contractors	Community complaints			
53	11,3	Culture, tourism, and recreational sites	As far as reasonably practicable, the project will schedule work schedule to avoid long term works in tourist areas (Vadu beach) or during peak hours of use in the tourist season (e.g. April to September). If this is not possible, the project will try to schedule works that would avoid the local tourist industry's peak days and hours and planned events.	BSOG and Contractors	Transport plan			
54	11,3	Culture, tourism, and recreational sites	BSOG will consider scheduling works that avoids high traffic volumes on the beach access road accessing (e.g. April-October). If not possible, BSOG and contractors will consider adjusting plans to avoid peak days and times as far as reasonably possible and/or agreeing options with the relevant local authorities.	BSOG and Contractors	Transport plan			
55	11,3	Culture, tourism, and recreational sites	In the unlikely event of project-related pollution impacting the beach, BSOG / Contractor will provide a trained intervention unit to-remediate accidental oil spills as quickly as possible to limit any pollution on the beach and reduce the time access to and use of the beach will be restricted-	BSOG and Contractors	Construction Spill Response Plan and Incident Records			
56	11,3	Culture, tourism, and recreational sites	The Reinstatement Management Plan will be implemented to ensure that the beach and the close located area keeps its initial appearance	BSOG and Contractors	Biodiversity Action Plan / Reinstatement Management Plan			
57	11,4	Employment	For all workers employed throughout all phases of the project, the appropriate legal provisions stipulated by the existing labour code will apply.	BSOG and Contractors	Inspection records			
58		Onshore Archaeology and Cultural Heritage	As a part of permitting requirements, an archaeological survey has already been undertaken (there are graves in the Corbu area). BSOG and Contractors will implement the project's Cultural Heritage Management and Monitoring Plan, including Chance Finds Procedure, to ensure appropriate safeguards are taken to protect any archaeological sites or artefacts on site.	BSOG and Contractors	Study Report and Permit compliance			