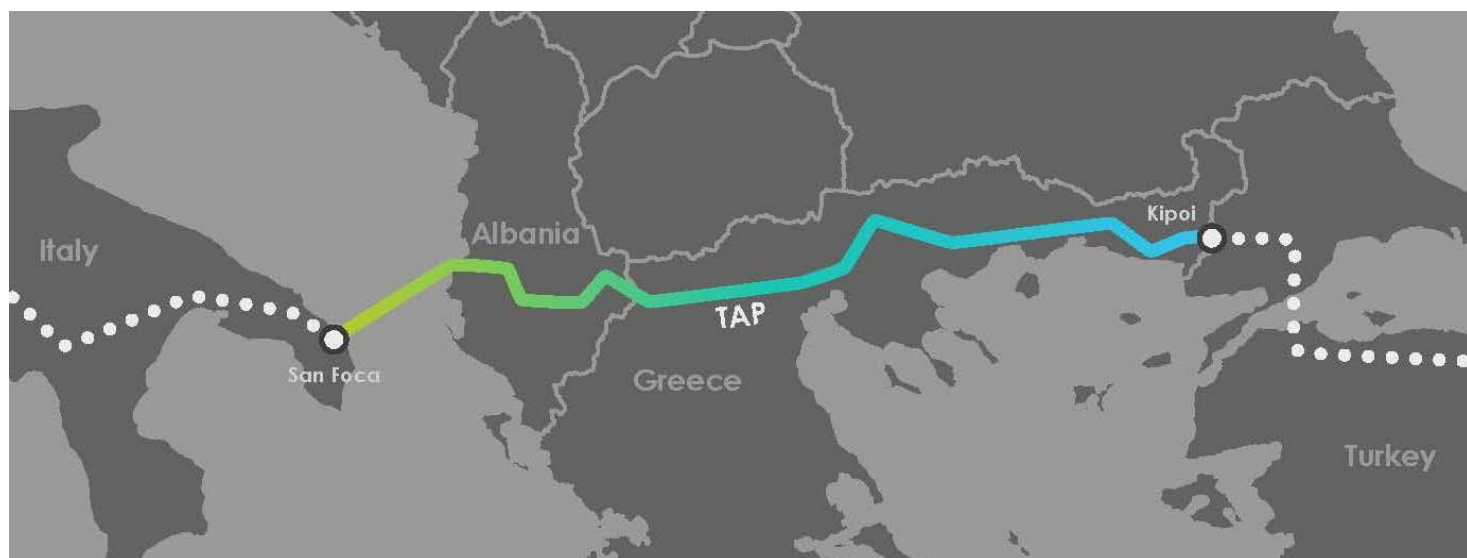





Trans Adriatic  
Pipeline




## Environmental and Social Management Plan

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## Glossary of Terms

<b>Contractor</b>	Engineering, Procurement and Construction (EPC) contractors and their sub-contractors
<b>Environmental impact</b>	A change to the environment (in this context the “environment” refers to any aspect of the natural or semi-natural physical environment (air, water, soil etc.)) which may occur as a result of Project activities. Impacts may be considered to be positive or negative.
<b>ESMS Project Standards Documents</b>	Documents detailing the Project Standards as applicable in each of the three TAP host countries
<b>Project Affected Person</b>	Any person who, because of the development or operation of the Project loses the right to own, use, or otherwise benefit from a built structure, land (whether residential, cultivated or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily. Project Affected Persons may also include people whose amenity, living standards, safety or security is affected by the Project.
<b>Socio-economic impact</b>	A change, or potential change, to the existing socio-economic environment which occurs because of Project activities. Social factors may include aspects such as demographics, community structure and relationships, health and wellbeing etc. and may refer to individuals, groups or wider communities of people. Economic factors may include, for example, employment, government or household finances, livelihoods etc. An impact may be positive or negative.
<b>Stakeholder</b>	Any person, group or organization who may be affected by the Project, and may in turn affect Project design, development or operation.
<b>Vulnerable Persons</b>	People or groups who may be functionally limited in their ability to participate in consultation and decision-making about the Project; in their physical capacity to adapt to new circumstances; in their ability to restore their livelihoods; or to benefit from Project opportunities. Vulnerability is characterised by higher risk and reduced ability to cope with shock or negative impacts. It may be based on socio-economic condition, gender, age, disability, ethnicity, or other criteria that influence people's ability to access resources and development opportunities.


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## List of Acronyms and Abbreviations

<b>ALARP</b>	As Low As Reasonably Practicable
<b>CCP</b>	EPC Contractor Control Plan
<b>CH</b>	Cultural Heritage
<b>CHA</b>	Cultural Heritage Advisor
<b>CHM</b>	Cultural Heritage Monitor
<b>CIA</b>	Cumulative Impact Assessment
<b>CLC</b>	Community Liaison Coordinator
<b>CLO</b>	Community Liaison Officer
<b>CSR</b>	Corporate Social Responsibility
<b>DCP</b>	Design Change Proposal
<b>DDP</b>	Design Development Proposal
<b>DMU</b>	Discrete Management Unit
<b>EBRD</b>	European Bank for Reconstruction and Development
<b>EBRD PR</b>	European Bank for Reconstruction and Development Performance Requirement
<b>EFM</b>	Environmental Field Monitor
<b>EIB</b>	European Investment Bank
<b>EPC</b>	Engineering, Procurement and Construction
<b>ERC</b>	Emergency Response Crew
<b>ERP</b>	Emergency Response Plan
<b>ESCH</b>	Environment, Social and Cultural Heritage
<b>E&amp;S</b>	Environmental and Social
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESIP</b>	Environmental and Social Implementation Plan
<b>ESCHMD</b>	Environmental, Social and Cultural Heritage Management Document
<b>ESMP</b>	Environmental and Social Management Plan
<b>ESMS</b>	Environmental and Social Management System
<b>ESIP</b>	Environmental and Social Implementation Plan
<b>EU</b>	European Union
<b>FEED</b>	Front End Engineering Design
<b>GA</b>	Government Affairs
<b>HGA</b>	Host Government Agreement
<b>HSSSE</b>	Health, Safety, Social, Security and Environment
<b>HR</b>	Human Resources
<b>IFC</b>	International Finance Corporation
<b>IFI</b>	International Financial Institutions
<b>IPMT</b>	Integrated Project Management Team
<b>ISO</b>	International Organization for Standardisation
<b>KP</b>	Pipeline Kilometre Point

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<b>LEA</b>	Land Easement and Acquisition
<b>MoM</b>	Minutes of Meeting
<b>NCR</b>	Non-conformance Reporting
<b>NGO</b>	Non-governmental organization
<b>OECD</b>	Organization for Economic Cooperation and Development
<b>PIMS</b>	Project Information Management System
<b>PRT</b>	Pipeline Receiving Terminal
<b>REIR</b>	Route Environmental Impact Register
<b>RFA</b>	Rapid Field Assessments
<b>RSIP</b>	Route Social Impact Plan
<b>RSIR</b>	Route Social Impact Register
<b>SCI</b>	Species of Conservation Interest
<b>SEI</b>	Social and Environmental Investment
<b>SFM</b>	Social Field Monitor
<b>SIMP</b>	Social Impact Management Plan
<b>SLIP</b>	Supplementary Lender Information Package
<b>SRG</b>	Snam Rete Gas
<b>TANAP</b>	Trans Anatolian Pipeline
<b>TAP</b>	Trans Adriatic Pipeline

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# 1. Purpose and Introduction

## 1.1 Introduction

The purpose of the Environmental and Social Management Plan (ESMP) is to:


- Provide an overview of the environmental, social and cultural heritage (ESCH) standards and specifications applicable to the TAP Project
- Document and direct TAP personnel and other stakeholders on how project ESCH risks are managed to conform with applicable TAP standards and specifications
- Outline organisational structure, key roles and responsibilities associated with ESCH management.

The ESMP provides an overview of the processes to identify, avoid, mitigate and manage ESCH risks. The ESMP is the central document of TAP's ESCH management system and is supported by:

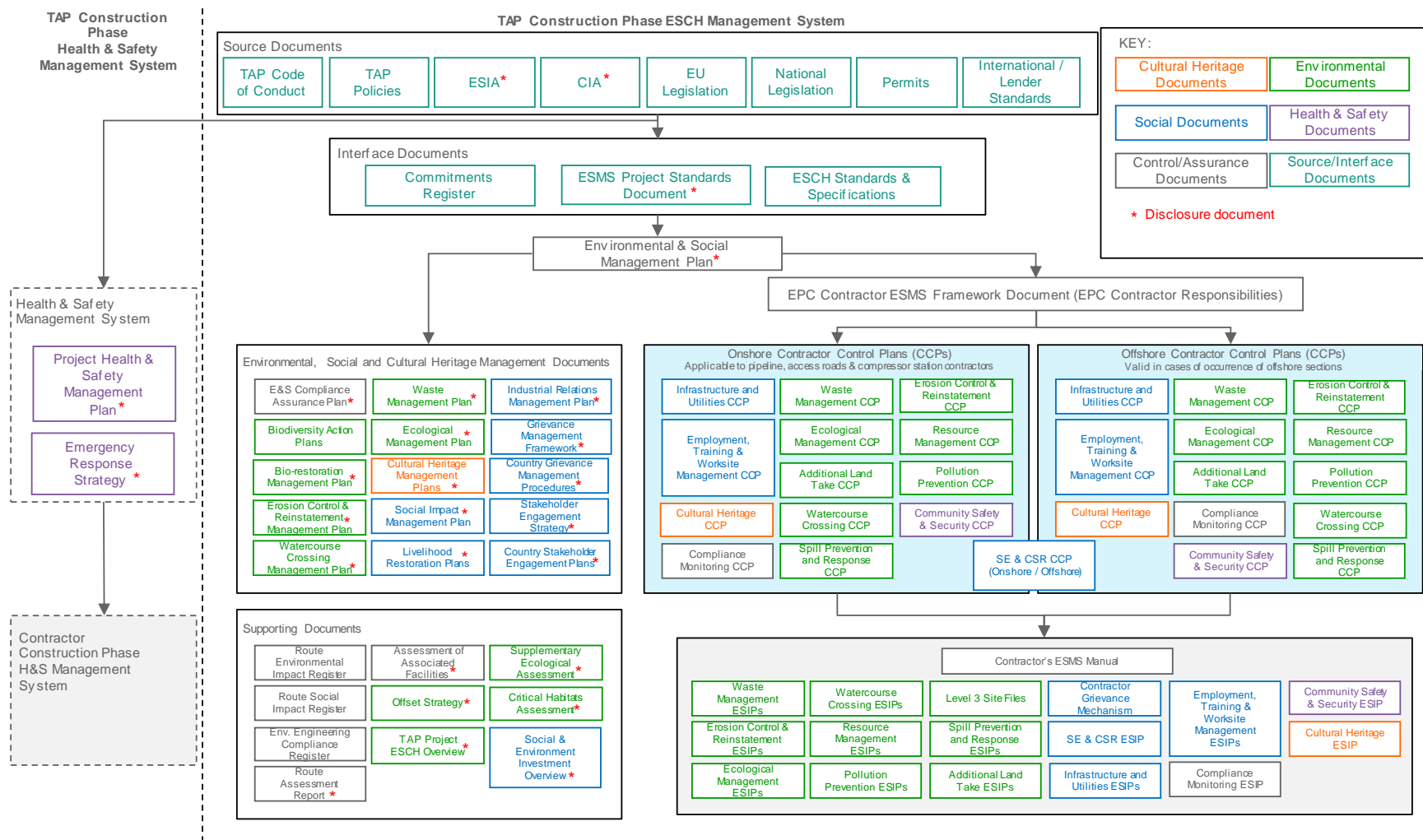
- TAP ESCH Standards and Specifications – specific design, procurement, construction and operational controls and general requirements for Contractors and TAP teams defined within the Contractor Control Plans, Consolidated ESMS Project Standards Document and design and construction specifications (see Section 2.5 and Table 2 in Section 5.2 of this ESMP).
- TAP ESCH Management Documents – translate TAP ESCH standards and specifications into documented procedures on how TAP ESCH standards and specifications are implemented and managed on the Project. The ESCH Management Documents detail TAP processes for managing Contractor performance, including TAP oversight, compliance and assurance activities, and processes for guiding implementation of TAP initiatives. TAP ESCH Management Documents form part of the ESMP (see Section 2.5 and Table 3 in Section 5.2 for an overview of the plans)
- Contractor ESCH management plans and Contractor Environmental and Social Implementation Plans (ESIPs).

The scope of this ESMP includes construction and commissioning stages of the Project. A revised version will be issued to support start up and operation stages of the Project 6 months prior to introduction of hydrocarbons into the TAP Facilities.

Figure 1 provides an overview of the ESCH management system and confirms those documents that will be disclosed as part of the TAP supplementary lender information disclosure package. TAP's ESCH management system is aligned with the requirements of ISO14001:2015, the International Organisation for Standardisation's (ISO) specification for environmental management systems. ISO14001 is an internationally recognised standard for managing environmental responsibilities in a systematic manner to achieve good environmental performance.

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**Figure 1 – ESCH Management System**






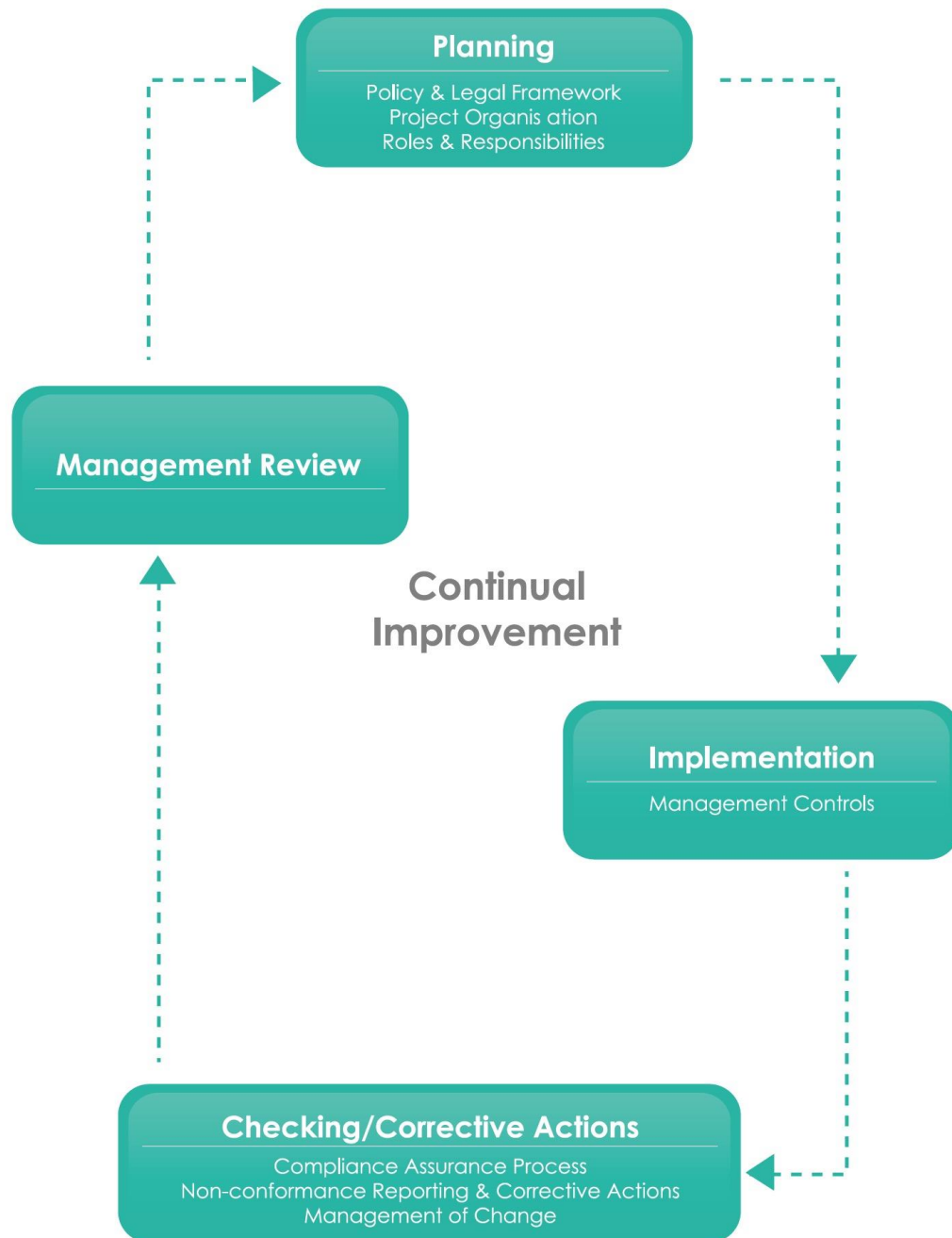

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Figure 2 presents the ESCH management system process that has been implemented to maintain the system's appropriateness and effectiveness.

**Figure 2 – ESCH Management System Process**



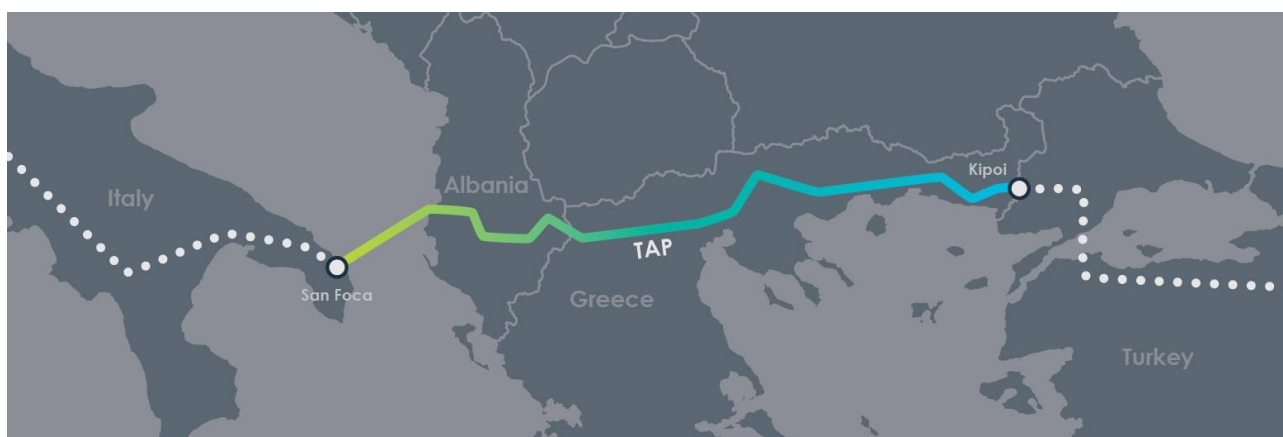
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## 1.2 Project Description


The Trans Adriatic Pipeline (TAP) Project is designed to transport natural gas from the Shah Deniz II development in Azerbaijan to the European market by supplying gas to the Italian network.

TAP will connect with the TANAP pipeline at Kipoi on the Turkish/Greek border and transport the gas through northern Greece to enter Albania east of Korca. The pipeline will continue through Albania and reach the Adriatic coastline near the city of Fier. It will cross the Adriatic Sea and come ashore in southern Italy at Melendugno, near the town of San Foca. TAP terminates at the Pipeline Receiving Terminal (PRT), 8.2 km inshore, close to the city of Lecce, where the gas is tied into the Snam Rete Gas (SRG) network. The total length of the TAP pipeline system will be approximately 878 km including the offshore pipeline section of 105km. The Project route is illustrated in Figure 3 below.

**Figure 3 – TAP Pipeline Route**



The Project is executed through a series of contracts with suppliers, for the provision of certain equipment and materials, and with engineering, procurement and construction (EPC) Contractors for the execution of Project construction in the host countries.

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## 2. Policy and Legal Framework

### 2.1 Health, Safety and Environmental Policies

TAP has developed and committed to a Health, Safety and Environment (HSE) Policy (TAP-HSE-PO-0001) aligned to internationally recognised health, safety and environmental standards and to the use of industry best practice. The HSE policy is applicable to all TAP activities (including all construction activities) and all personnel working for the Project.


TAP has also developed and committed to the following policies:

- CSR Policy (TAP-HSE-PO-0002)
- Code of Conduct (TAP-GEN-PO-0001)
- Corporate Security Policy (TAP-HSE-PO-0010)
- Quality Policy (TAP-QRM-PO-0001).

### 2.2 Country Constitutions

The constitutions of Greece, Albania and Italy are the highest laws of their respective countries and prevail over national legislation and international agreements. They stipulate the following:

- Greece:
  - *“The protection of the natural and cultural environment constitutes a duty of the State. The State is bound to adopt special preventive or repressive measures for the preservation of the environment.”*
  - *“Work constitutes a right and shall enjoy the protection of the State, which shall seek to create conditions of employment for all citizens”, and “general working conditions shall be determined by law, supplemented through collective labour agreements contracted by free negotiations and, in case of the failure of such, by rules determined by arbitration.”*
- Albania:
  - Requires institutions to maintain *“a healthy and ecologically adequate environment for the present and future generations”*
  - Regarding labour: *“everyone has the right to earn the means of living by lawful work that has chosen or accepted him. He is free to choose his profession, workplace and system of professional qualification. Employees have the right of social protection of labour.”*
- Italy:
  - It is required that the Republic *“safeguards the natural landscape and the historical and artistic heritage of the Nation.”*

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- *“The Republic recognises the right of all citizens to work and promotes those conditions which render this right effective.”*

## 2.3 Host Government Agreements

TAP has agreed the framework by which the project will be realized and operated on Greek and Albanian territories in the form of Host Government Agreements with the Greek and Albanian Governments. This framework includes processes related to land easement and acquisition, the implementation of technical, safety, environmental and social standards and permitting. The host government agreements (HGA)<sup>1</sup> for Albania and Greece establish:

- The key environmental and social international conventions, EU Legislation, EBRD/EIB/IFC performance requirements (PRs)/standards and other principles to which TAP is expected to conform to
- The required key permits
- How the government and public institutions will assist Project execution
- The system for obtaining the necessary land acquisition and easements for the Project.

## 2.4 Intergovernmental Agreement

The Intergovernmental Agreement (IGA) between Italy, Greece and Albania reinforces a range of key commitments to the forward development, construction and operation of the TAP pipeline. The IGA aims to ensure that the states cooperate on the timely delivery and efficient operation of the TAP pipeline and requires that a coordinated and uniform set of standards, including environmental and social standards, apply across the Project. The IGA has been ratified by the Italian, Greek and Albanian Parliaments.

## 2.5 Project ESCH Standards and Specifications


The Project is committed to meeting the requirements of:

- National environmental and social laws and regulations applicable to the Project in host countries
- Applicable EU legislation
- Applicable international conventions.

TAP has also adopted the following standards:

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<sup>1</sup> Only the provisions relevant to environment and social matters are mentioned.

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- EBRD Performance Requirements (PRs 1 through 6 and 8 through 10)<sup>2</sup> as per EBRD's Environmental and Social Policy (2014)
- EIB Environmental and Social Practices and Standards (2013)
- IFC Performance Standards (PS 1 through 6 and 8)<sup>3</sup> (January 2012)
- IFC EHS General Guidelines (2007)
- IFC Industry-specific Guidelines
  - the IFC EHS Guidelines for Onshore Oil and Gas Development (2007)
  - the IFC EHS Guidelines for Offshore Oil and Gas Development (2015)
- The Equator Principles III (2013)
- OECD Common Approaches (2012).

TAP has developed the ESMS Project Standards Document (CAL00-PMT-601-Y-TSP-0001) which details the Project Standards derived from the requirements, standards and principles listed above. Whenever applicable, the most stringent requirements of the above standards and guidelines were considered to form the ESMS Project Standards Document.


In addition to the numerical and performance standards defined in the ESMS Project Standards document, TAP has developed and provided to the Contractors within their contracts:

- Contractor Control Plans that focus on separate ESCH themes, each detailing ESIA commitments and the required Contractor documentation (Environmental and Social Implementation Plans (ESIP's)) to implement the commitments and supporting processes.
- Design and construction specifications/ standards:
  - specification for erosion protection measures
  - specification for reinstatement
  - specification for bio-restoration
  - specification for construction noise and vibration assessment
  - specification for acoustic survey and monitoring station – operate phase facility specification.

---

<sup>2</sup> EBRD PR 7 is a performance requirement in relation to Indigenous Peoples and is not applicable to TAP Project.

<sup>3</sup> IFC PS 7 is a performance standard in relation to Indigenous Peoples and is not applicable to TAP Project.

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This ESMP and the Environmental, Social and Cultural Heritage Management Documents form part of the TAP ESCH Management System and complement the CCP provisions with additional clarification and detail for the benefit of the Contractors.

Section 5 of the ESMP provides details on the ESCH management controls and assurance processes.

## 2.6 Permitting

TAP and its Contractors are each responsible for obtaining the permits required for construction and operational activities. TAP has developed and provided to its Contractors a Permits Register that lists the permits required and identifies who is responsible for obtaining them (e.g. TAP or its Contractors).

TAP and its Contractors (within their defined range of responsibilities) are responsible for identifying and complying with any new or forthcoming legislation and permits applicable to their activities. Any information concerning new or forthcoming legislation and permits identified by TAP is communicated to the Contractors as appropriate. However, this does not relieve the Contractors of their ultimate responsibility to identify and ensure compliance with all existing and new legislation and permitting requirements. Where necessary, the TAP ESCH management system is amended to reflect the changes in legal requirements and the new requirements communicated and implemented.

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### 3. Project Organisational Structure

#### 3.1 Overall TAP Organisation

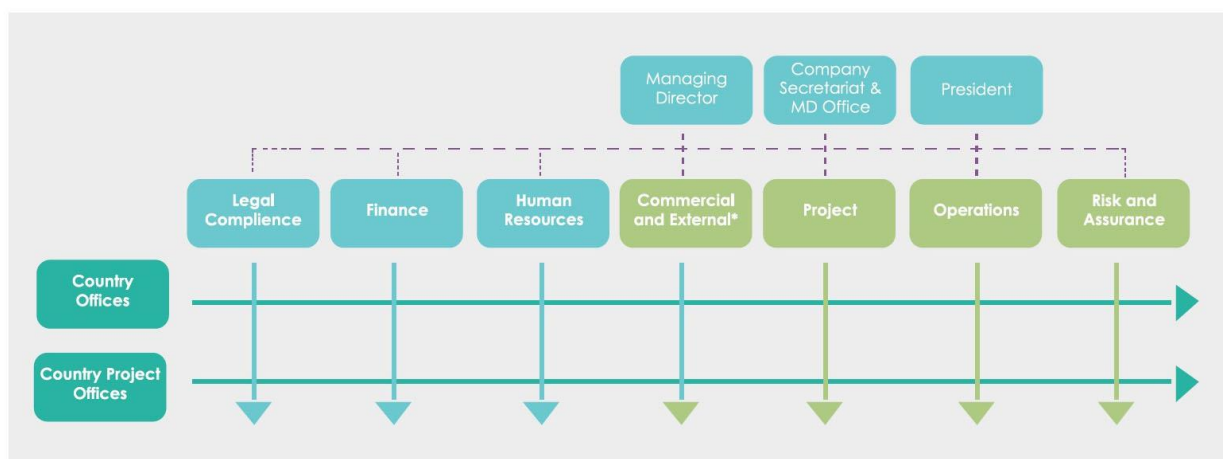
The TAP organisation covers the Project operations in TAP host countries, i.e. Greece, Albania (onshore and offshore) and Italy (onshore and offshore), and the corporate organisation in Switzerland. The Italy onshore and offshore scope, together with the Albania offshore scope is undertaken by the Project Management Contractor Italy (PMCI) reporting into the Integrated Project Management Team (IPMT) and corporate organisation in Switzerland. Onshore operations in Albania and Greece are undertaken by Project Management Teams in those countries.


Overall, TAP organisation is based on a Delivery and Functional Teams model (described in detail in the Organization Management Control (OMC) for Trans Adriatic Pipeline AG (TAP-PRM-ST-0002)) with consideration of the following underlying principles:

- Clear roles and responsibilities by having single point accountability across all aspects of the scope, both in Delivery teams (What and By When) and in Functional teams (How)
- Working more effectively by leveraging best practices across the organisation
- Performance focus of the Project.

TAP 'Functional-Delivery Way of Working' model is based on a matrix organisation structure illustrated in Figure 4 below.

**Figure 4 – Functional-Delivery Organizational Model**




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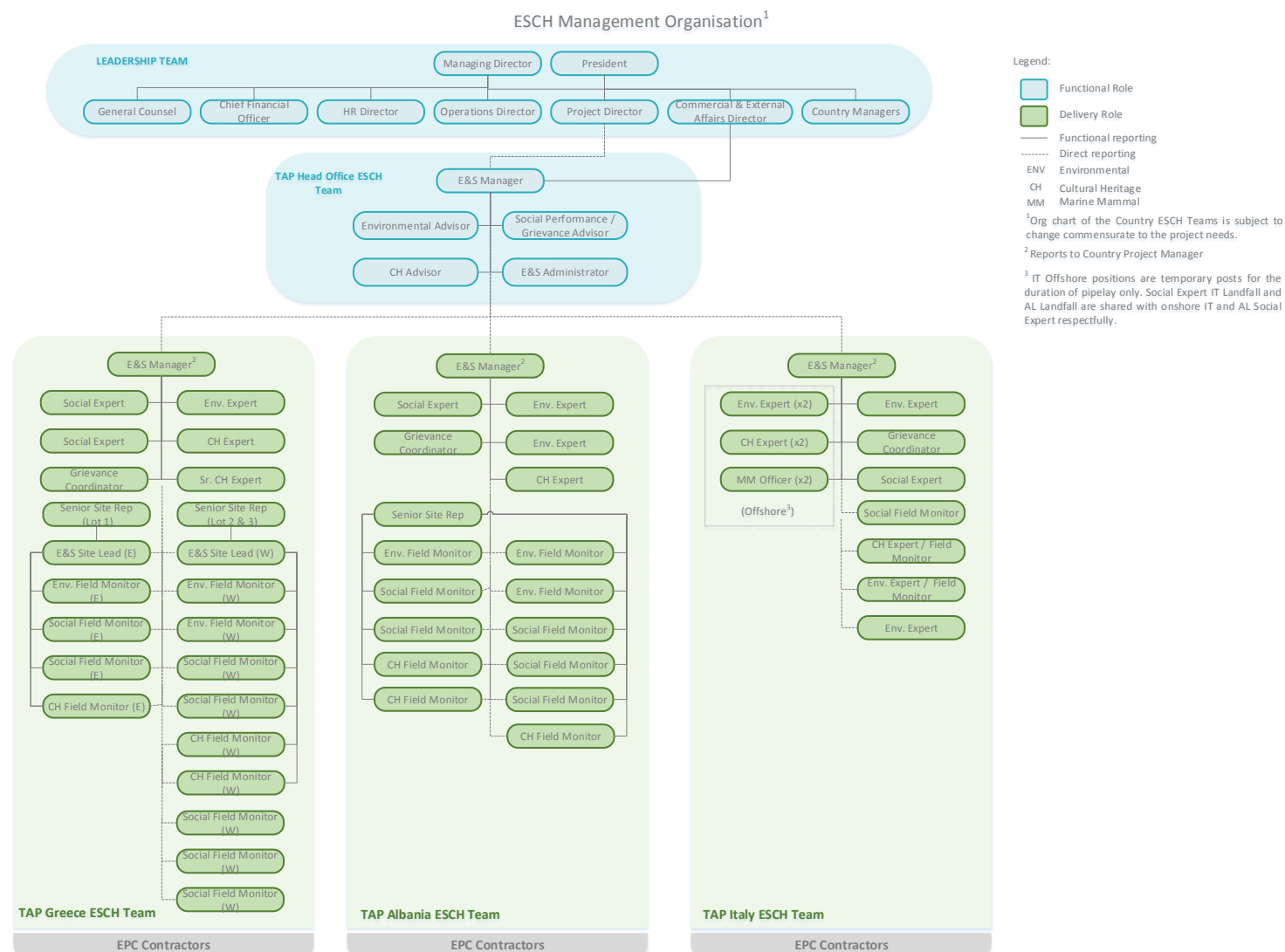
## 3.2 Environmental, Social, Health & Safety Organisation


Within the frame of the Functional-Delivery model, TAP's ESCH function is part of the Commercial and External Affairs team. The Corporate ESCH Team reports to the Commercial and External Affairs Director and the Project (IPMT) Director. The ESCH in-country teams sit within the IPMT with dual reporting lines to the in-country Project Managers (administrative reporting) and to the TAP E&S Manager (functional reporting). The TAP ESCH organisation is presented in Figure 5.



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**Figure 5 – TAP ESCH Organization**



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## 4. Roles and Responsibilities

TAP is ultimately responsible for ensuring that the Project and its Contractors complies with TAP ESCH Management Documents, including this ESMP, and TAP ESCH Standards and Specifications. Whilst it is understood that Contractors are responsible for compliance with TAP ESCH Standards and Specifications throughout all their activities, the additional information included in the ESMPs and SLIP will be communicated to all Contractors with the understanding that the TAP ESCH management documents are the Project / International financial institutions Compliance Documents. The TAP ESCH management documents are the overriding ESCH documents and take priority over the Contractor ESCH management plans and Contractor Environmental and Social Implementation Plans (ESIPs).

TAP management controls and oversight and assurance processes of Contractor compliance are summarised within Section 5 of this ESMP and are detailed within TAP E&S Compliance Assurance Plan (CAL00-PMT-601-Y-TTM-0005).

Key roles and responsibilities for the implementation of the ESMP are summarised below.

### 4.1 TAP Managing Director

The TAP Managing Director has overall HS and ESCH accountability for the TAP Project, including:

- Providing leadership on all TAP issues including ESCH goals and expectations
- Ensuring compliance with legal and regulatory requirements.

### 4.2 Commercial and External Affairs Director


The Commercial and External Affairs Director is accountable for all external stakeholder-facing functions (Communications, Government Affairs, Stakeholder Management, Land Management and the ESCH function) and is responsible for:

- Providing leadership and assurance to ensure TAP implements its ESCH goals and expectations
- Ensuring compliance with legal and regulatory requirements
- Verifying that adequate resources are in place to implement planned ESCH programmes e.g. organisation, training, processes and qualified personnel.

### 4.3 Project Director

The Project Director is the single point of accountability for the overall physical delivery of the TAP project pipeline and facilities (including all design, engineering, construction and commissioning). The TAP ESCH Manager has a dotted reporting line to the Project Director to ensure that ESCH support is integrated into delivery of the TAP project. The Project Director is responsible for:

- Ensuring the project delivery managers are accountable for ESCH performance within their delivery scope

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- Providing leadership by clearly defining ESCH goals and expectations
- Ensuring compliance with legal and regulatory requirements
- Verifying that adequate resources are in place to implement planned HSE programmes e.g. HSE organisation, permitting, training, equipment and qualified personnel.

#### 4.4 Engineering Manager

The Engineering Manager provides support to the E&S Manager, ensuring TAP's ESCH oversight and assurance processes of the Contractors design and procurement activities are implemented to applicable ESCH standards and specifications.

#### 4.5 TAP E&S Manager

The TAP E&S manager has two key roles: project delivery support and verifying conformance to TAP ESCH standards. The TAP E&S manager is responsible for:


- Developing a Project ESCH management system that details how ESCH risks will be systematically identified, assessed, avoided, mitigated and managed, as well as a supporting system of TAP assurance and Contractor oversight
- Providing ESCH resources for implementation of the ESCH management system
- Providing the Project leadership team and functional leaders with ESCH management system advice, guidance and assurance
- Promoting standardisation and simplification of ESCH management system plans, processes and procedures
- Developing and managing a budget for the ESCH management system team and ensuring that ESCH management system team activities are effectively conducted within the constraints of the budget.

#### 4.6 Functional and Country based ESCH team


To support implementation of the TAP ESCH standards and specifications, an ESCH assurance team in headquarters and in each of the TAP host countries, a team focusing on Contractor oversight and TAP assurance, has been developed and their roles and responsibilities are provided below.

**Table 1 – Country-Based ESCH Roles and Responsibilities**

Role	Responsibility
<b>Corporate Level</b>	
<b>ESCH assurance team (Environmental Advisor, Social Performance/ Grievance Advisor and Cultural Heritage Advisor)</b>	<p>Providing functional support to the in-country ESCH teams to implement the ESCH management system</p> <p>Coordination and management of ecological surveys, monitoring and long term ecological management programmes</p>

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Role	Responsibility
	<p>Management of the grievance management system</p> <p>Leading audits of the Contractors in conjunction with the country E&amp;S teams</p> <p>Supporting TAP ESCH assurance activities.</p>
<b>Country Level</b>	
<b>In-country Project Manager(s) (IPMT)</b>	<p>Ensuring that construction, installation, mechanical completion, pre-commissioning, commissioning and start-up are carried out in line with Project objectives and in accordance with the agreed scope, schedule and TAP policies and procedures including the ESCH management system.</p>
<b>In-country E&amp;S Manager(s)</b>	<p>Communicating the contents of this ESMP and any changes to the in-country TAP and Contractor teams and acting as the focal point to promote implementation, monitor performance and provide guidance and support</p> <p>Management of the in-country ESCH resources to support implementation of this ESMP and ESCH management system at country level</p> <p>Managing the review and acceptance of Contractor ESIPs and supporting plans and processes, e.g. associated sub-plans</p> <p>Informing Contractors on ESCH responsibilities as defined in this plan and detailed in the ESCH Management Documents and ensuring these are understood and implemented throughout all construction stages (from construction initiation to end of commissioning).</p> <p>Country focal point for Contractor oversight in accordance with this plan.</p> <p>Ensuring that all ESCH related incidents are reported and dealt with effectively and lessons learned are shared in accordance with the TAP incident reporting procedure</p> <p>Supporting TAP ESCH assurance activities.</p>
<b>TAP Senior Site Representative(s)</b>	<p>Accountable for implementation of this plan at the sites they have accountability for (e.g. pipeline lots or at facilities such as compressor stations etc.)</p> <p>Support the ESCH Field Monitors/ Leads in their duties in relation to this plan.</p>
<b>In-country Environmental, Social, Cultural Heritage Expert(s)</b>	<p>Oversight of the Contractor's activities to ensure they align with TAP ESCH management system requirements and the Contractor ESIPs and supporting plans and processes e.g. associated sub-plans</p> <p>Support ESCH and construction field staff through assistance with pre-construction surveys, document review, incident investigation and technical advice</p> <p>Organising and participating in TAP in-country inspections, reviews and audits of the Contractor performance with respect to the requirements of this ESMP</p> <p>Reporting on E&amp;S compliance and corrective action implementation to the in-country E&amp;S Manager</p> <p>Supporting TAP ESCH assurance activities.</p>
<b>Environmental and Social Site Lead(s) (Greece)</b>	<p>Coordination of the ESCH field monitors' activities along the Right Of Way and at the above-ground facilities</p> <p>Focal point for field-based ESCH oversight of Contractor activities to ensure alignment with TAP ESCH management system requirements and the Contractor ESIPs and supporting plans and processes, e.g. associated sub-plans</p> <p>Supporting TAP ESCH assurance activities.</p>
<b>Environmental, Social, Cultural Heritage Field Monitor(s)</b>	<p>Field based ESCH oversight of Contractors</p> <p>Daily reporting on ESCH inspections, monitoring and site observations</p> <p>Supporting TAP ESCH assurance activities.</p>

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## 5. ESCH Management Controls

This section provides an outline of the tools and processes adopted to manage, monitor, measure and report compliance with TAP ESCH standards and specifications.

TAP ESCH management controls cover the full life-cycle of TAP. This document focuses on the construction and operational readiness planning phase. Future versions of this ESMP will focus on the operational phase of the Project and will be available 6 months prior to introduction of hydrocarbons into TAP facilities.

ESCH operational controls currently focus on three core areas:

- Engineering and Procurement
- Construction phase
- Operational readiness


### 5.1 ESCH Engineering and Procurement operational controls

Within the TAP ESCH standards and specifications, there are commitments to eliminate, minimise and manage environmental and social impacts associated with the operation of the permanent TAP facilities. To ensure that TAP complies with these ESCH standards and specifications an Environmental Engineering Compliance Register has been developed by the Project.

The Environmental Engineering Compliance Register lists the ESCH standards and specifications that relate to design and procurement phases, along with the specific implication that each requirement has on design and procurement activities. The Environmental Engineering Compliance Register logs engineering evidence for design activities, and vendor evidence for procurement activities, to demonstrate compliance and track changes or associated additional work.

The Register presents the following:

- Relevant ESCH standards and specifications, their source (e.g. ESIA or TAP specification) and the resulting implications on design and procurements activities
- Evidence from engineering design documents to show compliance with the commitments / requirements. The document number and revision is stated along with an explanation of how the requirement is being met. Typical design documents used as evidence include:
  - Process and Instrumentation Diagrams (P&IDs)
  - Equipment datasheets and
  - Process Basis of Design documents.
- Any further actions necessary to achieve compliance (e.g. where the resolution is ongoing or where additional clarification is needed)
- Any requirements for onsite checks during construction (e.g. provision of sample ports for emissions testing)
- Any actions for the Operation Phase (e.g. waste disposal procedures)

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- Supporting work / information to clarify interpretation of standards or specifications and manage changes and
- An explanation for any items that provide an alternative system to that specified in the ESCH standards and specifications.

The Environmental Engineering Compliance Register is a 'live' document that is updated on a regular basis. The actions recorded in the Register are also logged in the Project Information Management System (PIMS). To support Contractor oversight, studies and reviews will be completed to confirm appropriate controls have been included in the facilities design and that vendors can achieve the required standards and specifications (e.g. review of Contractor noise assessments).

An Environmental Construction, Commissioning and Start-Up Assurance Register will be prepared 6 months prior to introduction of hydrocarbons into TAP facilities to replace the Environmental Engineering Compliance Register and will include:

- Project operation procurement/planning issues (e.g. operational procedures for drainage systems)
- Construction issues such as drainage connections and bunding
- Commissioning and start-up issues.

An external assurance review of the Environmental Engineering Compliance Register will be completed at key Project milestones to verify conformance. The Environmental Engineering Compliance Register and Construction, Commissioning and Start-Up Assurance Register will align with established TAP project execution processes managed by the TAP engineering, construction, commissioning and operational teams.


## 5.2 Construction and Operational Readiness Phases ESCH Operational Controls

During the construction and operational readiness phases the ESCH operational controls focus on:

- Implementation of the TAP ESCH management system as described in this ESMP
- Implementation by the Contractors of TAP's ESCH standards and specifications
- Oversight of Contractor activities (engineering, procurement, construction and, in future, operational support contractors) to measure the effectiveness of their self-verification processes with ESCH standards and specifications
- Compliance and assurance to verify that the work planned and performed is conducted according to the ESCH standards and specifications and ESCH management system.

To ensure that Contractors develop appropriate processes to implement and self-verify compliance with the ESCH standards and specifications, the documents in


Table 2 were included in the EPC tender and contractual documents.

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**Table 2 – ESCH Standards and Specifications**

ESCH Standards and Specifications	Greece			Albania			Italy		
	Spiecapag Onshore, Lot 1	Bonatti JP Avax JV Onshore, Lots 2 and 3	Renco Terna JV Compressor Station	Spiecapag Onshore, Lots 4 and 5	Renco Terna JV Compressor Station	Saipem Offshore Pipeline Construction	Enerco Max Streicher JV Onshore Pipeline Construction	Renco Pipeline Receiving Terminal	Saipem Offshore Pipeline Construction
<b>Standards and Specifications</b>									
ESMS Project Standards Document	√	√	√	√	√	√	√	√	√
Specification for Erosion Protection Measures	√	√		√					
Specification for Reinstatement	√	√		√	√		√	√	
Specification for Bio-restoration	√	√		√	√		√		
Specification for construction noise and vibration assessment	√	√		√			√		
Specification Acoustic Survey and Monitoring Station - focus on facility specifications			√		√		√	√	
<b>EPC Contractor Control Plans (CCP)</b>									
Onshore Compliance Monitoring	√	√	√	√	√		√	√	
Onshore Pollution Prevention	√	√	√	√	√		√	√	
Onshore Spill Prevention and Response	√	√	√	√	√		√	√	
Onshore Waste Management	√	√	√	√	√		√	√	
Onshore Ecological Management	√	√	√	√	√		√	√	
Onshore Erosion Control and Reinstatement	√	√	√	√	√		√	√	
Onshore Watercourse Crossing Plan	√	√	√	√	√		√	√	
Onshore Additional Land Take	√	√	√	√	√		√	√	
Onshore Resource Management	√	√	√	√	√		√	√	
Onshore Infrastructure and Utilities	√	√	√	√	√		√	√	
Onshore Community Security and Safety	√	√	√	√	√		√	√	
Onshore Employment, Training and Worksite Management	√	√	√	√	√		√	√	
Onshore Stakeholder Engagement and CSR	√	√	√	√	√		√	√	
Onshore Cultural Heritage	√	√	√	√	√		√	√	




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ESCH Standards and Specifications	Greece			Albania			Italy		
	Spiecapag Onshore, Lot 1	Bonatti JP Avax JV Onshore, Lots 2 and 3	Renco Terna JV Compressor Station	Spiecapag Onshore, Lots 4 and 5	Renco Terna JV Compressor Station	Saipem Offshore Pipeline Construction	Enerco Max Streicher JV Onshore Pipeline Construction	Renco Pipeline Receiving Terminal	Saipem Offshore Pipeline Construction
Offshore Compliance Monitoring						√			√
Offshore Pollution Prevention						√			√
Offshore Spill Prevention and Response						√			√
Offshore Waste Management						√			√
Offshore Ecological Management						√			√
Offshore Erosion Control and Rein-statement						√			√
Offshore Watercourse Crossing Plan						√			√
Offshore Additional Land Take						√			√
Offshore Resource Management						√			√
Offshore Infrastructure and Utilities						√			√
Offshore Community Security and Safety						√			√
Offshore Employment, Training and Worksite Management						√			√
Offshore Stakeholder Engagement and CSR						√			√
Offshore Cultural Heritage						√			√

The Contractor ESIPs are the key operational control documents defining their assurance and self-verification processes. The Contractors' ESIPs and associated supporting sub plans detail their organisations' roles and responsibilities for implementation, technical details (including design and equipment) and self-verification processes to comply with the requirements in the corresponding CCPs.


TAP ESCH Management Documents detail the management and implementation processes required to achieve TAP's ESCH standards and specifications. The management plans include information on the TAP ESCH oversight, compliance and assurance activities of the Contractors, and the contractors who will in future provide operational services to TAP. The plans also describe the processes of assurance that TAP as an organisation is implementing to confirm compliance with the ESCH standards and specifications. Table 3 provides an overview of the TAP ESCH Management documents.



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**Table 3 – TAP ESCH Management Documents**


No	ECHSMD	Issues covered
<b>Control / Assurance Documents</b>		
1	<b>Environmental &amp; Social Compliance Assurance Plan</b>	<ul style="list-style-type: none"> <li>• TAP and Contractor responsibilities</li> <li>• Contractor Assurance Programme</li> <li>• TAP Assurance Programme (Oversight and Assurance)</li> <li>• Non-conformance, Work Improvement Notices and Corrective Actions Recording</li> </ul>
<b>Environmental Documents</b>		
2	<b>Ecological Management Plan</b>	<ul style="list-style-type: none"> <li>• Overarching biodiversity management control document</li> <li>• Project biodiversity management system</li> <li>• Biodiversity identification, management, monitoring and restoration</li> </ul>
3	<b>Biodiversity Action Plans (BAPs)</b>	<ul style="list-style-type: none"> <li>• Species and site-specific monitoring programme</li> <li>• Presents long-term biodiversity initiatives such as biodiversity offsets</li> </ul>
4	<b>Bio-restoration Management Plan</b>	<ul style="list-style-type: none"> <li>• Bio-restoration Planning</li> <li>• Bio-restoration Execution</li> <li>• Monitoring, maintenance and aftercare</li> </ul>
5	<b>Soil Erosion and Reinstatement Plan</b>	<ul style="list-style-type: none"> <li>• Defines soil erosion controls and associated standards and monitoring</li> <li>• Temporary and permanent erosion control measures</li> <li>• Inspection and maintenance programme</li> <li>• Reinstatement and revegetation measures</li> </ul>
6	<b>Watercourse Crossing Plan</b>	<p>Defines overarching philosophy for works at watercourse crossings including:</p> <ul style="list-style-type: none"> <li>• Watercourse characterisation</li> <li>• Watercourse crossing design</li> <li>• Ecological considerations and constraints</li> <li>• Environmental protection measures</li> <li>• Construction methodologies</li> <li>• Reinstatement and Monitoring</li> </ul>
7	<b>Waste Management Plan</b>	<ul style="list-style-type: none"> <li>• Waste hierarchy (i.e. reduction at source, reuse, recycling, energy recovery, responsible disposal) and waste minimisation</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>• Monitoring and reporting.</li> </ul>
<b>Social Documents</b>		
8	<b>Social Impact Management Plan</b>	<ul style="list-style-type: none"> <li>• Defines the overarching TAP Project framework for social impact management.</li> <li>• Describes TAP's approach to ensuring the mitigation of Project-associated social impacts</li> <li>• Provides a management tool to guide TAP staff and Contractors in social impact management</li> </ul>

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		<ul style="list-style-type: none"> <li>• Supports the alignment and integration of TAP social performance functions to optimize efficiency in social impact management and Project implementation.</li> </ul>
9	<b>Stakeholder Engagement Strategy and management plans</b>	<ul style="list-style-type: none"> <li>• Overarching framework for all stakeholder engagement-related activities</li> <li>• Stakeholder identification;</li> <li>• Stakeholder engagement programme</li> <li>• Monitoring and reporting</li> </ul>
10	<b>Grievance Management Framework and management plans</b>	<ul style="list-style-type: none"> <li>• Framework for all third-party grievance management</li> <li>• Defines process of managing and resolving grievances</li> <li>• Grievance classifications and definitions</li> <li>• Defines reporting and monitoring requirements</li> </ul>
11	<b>Industrial Relations Management Plan</b>	<ul style="list-style-type: none"> <li>• Training and skill development activities</li> <li>• Employee grievance mechanism</li> <li>• Monitoring and reporting</li> </ul>
12	<b>Livelihoods Restoration Plans</b>	<ul style="list-style-type: none"> <li>• Process implemented to ensure that adverse impacts on people, their rights, livelihoods, culture and environment are avoided or, where avoidance is not possible, minimised, mitigated, offset and/or compensated</li> <li>• Defines process of land easement and acquisition (LEA)</li> <li>• Defines process implemented to avoid, manage, mitigate, minimise the impacts of LEA activities on people, their rights, livelihoods, culture and environment</li> </ul>
13	<b>Social &amp; Environment Investment Strategy</b>	<ul style="list-style-type: none"> <li>• Outlines TAP's approach to social and environmental investments, monitoring and evaluation</li> <li>• Describes the overarching business case and objectives of the SEI programme</li> <li>• Outlines the implementation plans in each host country</li> </ul>
<b>Cultural Heritage Documents</b>		
14	<b>Cultural Heritage Management Plans</b>	<ul style="list-style-type: none"> <li>• Chance find management and response</li> <li>• Interface and coordination with relevant authorities</li> <li>• Monitoring and reporting of activities to recover and record cultural heritage assets</li> </ul>
<b>Health and Safety Documents</b>		
15	<b>Project Health &amp; Safety Management Plan</b>	<ul style="list-style-type: none"> <li>• HSMS structure, framework and H&amp;S organisation</li> <li>• Defines minimum health and safety standards that Contractor must meet</li> <li>• Specifies procedures for risk management, performance targets and Contractor management</li> </ul>
16	<b>Emergency Response Strategy</b>	<ul style="list-style-type: none"> <li>• Defines TAP Emergency Response Organisation</li> <li>• Details Duty Manager System and external engagement</li> <li>• Specifies responsibilities of the teams and functions (including checklists) and the facilities required in the Emergency Response Room</li> </ul>

### 5.3 Environmental and Social Registers

Prior to initiation of construction works on any plot of land, either in the ROW or any other land used by the Project, TAP develops Route Social Impact Registers (RSIR) and Route Environmental Impact Registers (REIR) to manage georeferenced data on environmental and social constraints,

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sensitivities and the associated management actions. TAP and its Contractors use the RSIR and REIR as a living and dynamic planning and management tool to:

- Ensure all teams recognise the specific constraints and sensitivities and reference the most recent environmental and social data
- Provide oversight, compliance and assurance to support delegation, implementation and monitoring of mitigation and monitoring activities associated with the specific constraints and sensitivities.


Separate RSIR and REIRs are prepared for each country. The process to manage soil erosion risk is described in the Soil Erosion and Reinstatement Plan, and Soil Erosion and Risk Assessment

Registers are maintained to highlight risk and mitigation measures. The purpose of the registers is described below in Figure 6.

The RSIR and REIR database and associated impact assessment and mitigation tools ensure that all information on sensitive sites and recommended mitigations is centralised in a single location that is available to TAP and its Contractors. The Register format is applied across all countries and Contractors to ensure consistency in the environmental and social management approach. The approach to managing cultural heritage chance finds and known resources are documented in country specific cultural heritage management plans.

**Figure 6 – Overview of the Environmental and Social Impact Registers**



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TAP country ESCH Team are responsible for population and maintenance of the Registers. Each section of the pipeline route is populated with identified features and assets in the Project's Area of Influence, utilising satellite imagery and Project data, including but not limited to the sensitivity factors described in Table 4 below.

**Table 4 Social and Environmental Sensitivity Factors**

Social	Environmental
Housing and related structures	Protected areas
Areas of high productivity land or high value crops	Critical Habitat
Animal husbandry (including grazing)	Sensitive flora
Businesses and recreational areas	Sensitive fauna
Irrigation systems and other types of infrastructure/utilities	Watercourse crossings
Crossings of heavily used roads	Seasonal restriction areas
Highly populated areas	Ecological survey requirements
Access to land (e.g. for agricultural purposes or access to houses)	Watercourse crossings
Educational facilities (primary, secondary, tertiary) and medical facilities	Other environmental sensitive receptors
Cemeteries, churches and other religious sites (e.g. monasteries).	

Preparation of the RSIR and REIR includes a review of the ESIA, post-ESIA survey reports, CCPs, Contractor ESIPs, ESCH Management Plans and any sub-plans, which relate to the pipeline section as a whole or its individual features.


Information generated through the RSIR and REIR is presented monthly to a cross-functional Working Group of different TAP departments that may include:

- ESCH
- Land Management
- Construction Management
- Legal
- Stakeholder Engagement.

Within TAP and Contractor ESCH teams the registers are used in weekly meetings to support work planning. TAP and Contractor cross-functional meetings support implementation and management performance issues associated with the RSIR and REIR.

### 5.3.1 Risk Levels

Based on the potential risk for social and environmental impacts, site entries are assigned with a risk level. The risk levels are defined as follows:

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**Table 5 Site Risk Levels**


Risk	Level	Description
<b>Low</b>	Level 1	Social: Sites within the Project's Area of Influence with no likely impact Environmental: Sites within the Project's Area of Influence with no likely impact to sensitive flora and fauna, including critical habitat and protected areas.
<b>Medium</b>	Level 2	Social: Sites within the Project's Area of Influence with potential impact Environmental: Sites within the Project's Area of Influence with potential impact to sensitive flora and fauna, including critical habitat and protected areas.
<b>High</b>	Level 3	Social: Sites within the Project's Area of Influence with confirmed impact Environmental: Sites within the Project's Area of Influence with confirmed sensitive flora and fauna, including critical habitat and protected areas.

As part of the identification of sites, 'triggers' listed in Table 6 are applied to each identified site to determine the level of risk.

**Table 6 Social and Environmental Triggers**

Trigger	Description
<b>Social</b>	
Structures in or adjacent to ROW (e.g. residences, businesses, agriculture)	Adjacent is defined as 50m from ROW edge in flat plains/agricultural areas Adjacent is defined as 100m from ROW edge in mountainous areas <sup>4</sup>
Structures with only one access route across the ROW	
Sensitive agricultural uses (e.g. high value crops, beehives, etc.)	In the Project Area of Influence (defined as 200m from ROW edge in flat plains/agricultural areas and 500m from ROW edge in mountainous areas)
Formal grievance lodged	Through TAP grievance management system
Land Entry Refusal Protocol or MOD	Through Land Management
<b>Environmental</b>	
Critical Habitat	ROW is within Critical Habitat DMU
Protected areas	ROW is within Protected area or has the potential to connect a potential area, e.g. via a watercourse conduit
Priority Biodiversity Features in the ROW	These include (i) threatened habitats; (ii) vulnerable species; (iii) significant biodiversity features identified by a broad set of stakeholders or governments (such as Key Biodiversity Areas or Important Bird Areas); and (iv) ecological structures and functions needed to maintain the viability of priority biodiversity features

<sup>4</sup> Adjacent is considered to be a wider area in mountainous areas, as the use of blasting or hammers is more likely.

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Trigger	Description
Other environmental sensitive receptors	These include incidents of degraded environmental quality e.g. surface water and soil quality issues that require the adoption of unique construction or environmental controls to manage the risk

Where no triggers are applied, the site risk is considered to be low and the risk level of the site is assigned Level 1. In instances where one or more triggers are identified, risk is considered to be medium/high and a Rapid Field Assessment is conducted to determine the risk level (Level 2 or 3).

Site data are entered into the RSIR and REIR by SFMs, EFM and Contractor personnel. As part of their routine work the SFMs and EFM capture sites on an ongoing basis from:

- Project documentation
- Field observation
- Satellite imagery.

The SFMs and EFM submit RSIR and REIR site entry updates to the TAP Environmental and Social Site Leads who then query, verify and load the entries into the RSIR and REIR.

### 5.3.2 Rapid Field Assessments

Following the identification of sites, discrete site visits are undertaken to medium/high risk sites to prepare Rapid Field Assessments (RFA) to assess the potential severity and likelihood of impacts, and further inform the Register. RFAs are prioritised according to construction schedules and complexity of impacts, to ensure maximum time for assessment and resolution of impacts.

RFAs are carried out by SFMs and EFM on an ongoing basis, as part of their routine work. SFMs and EFM submit the new or updated RFAs along with updated register information to the TAP Environmental and Social Experts who maintain the registers.

### 5.3.3 Site Files


Upon identification of a confirmed impact through an RFA, a site is elevated to Level 3. Where a site is elevated to Level 3 status, the Rapid Field Assessment findings are reviewed, and an individual Site File is prepared. The Site File will include the following phases and sections:

#### Phase 1: Assessment Phase

- Rapid Field Assessment key findings, and additional data gathering within TAP
- Information gathering / coordination with relevant TAP departments and Contractor
- Development of draft potential mitigation measures
- Key actions

#### Phase 2: Engagement Phase

- Communication Plan
- Additional information requirements.

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### Phase 3: Implementation Phase

- Confirmed Mitigation and Monitoring Plan (including schedule, budget and responsibilities).

## 5.4 TAP ESCH Compliance Assurance Process

TAP has developed a compliance assurance process to ensure environmental, socio-economic and cultural heritage compliance with TAP ESCH Management Documents and ESCH standards and specifications. This compliance assurance process is based on the Contractors undertaking a structured self-verification process to monitor implementation of the TAP ESCH Management Documents, TAP ESCH standards and specifications, and TAP undertaking monitoring, oversight and assurance activities of the Contractor and TAP led activities. Three key processes that support ESCH performance management include:

- Non-conformance reporting
- Incident reporting and investigation
- Management of ESCH change.

### 5.4.1 Non-Conformance Reporting and Corrective Actions

TAP has established a non-conformance management system, as documented in the Non-Conformity Management Procedure (CAL00-PMT-000-V-TPQ-0001). Non-conformances are unapproved (by TAP) deviations from TAP ESCH Specifications or Standards and TAP or Contractor Management Plans. These are typically identified by ESCH personnel through the oversight and assurance process (e.g. daily monitoring, oversight inspections and audits).


Non-conformances are classified using a 5-level severity scale, aligned with severity definitions and reporting timeframes of ESCH incidents detailed within H&S and ESCH Data, Incident Reporting and Investigation Procedure (TAP-HSE-PR-0011) as shown in Table 7 below. The highest potential severity description within Table 7 will be selected to classify non-conformances.

The notification and reporting process to international financial institutions of non-conformances has yet to be finalised, once the non-conformance categories, the trigger for notification and reporting, timescales, and format of reporting has been agreed a revision to this document will be made by TAP to detail the agreed process.

**Table 7 – ESCH Incident and Non-conformance Severity Categories**


Category	Severity Description		
	Environment <sup>1,2</sup>	Social / Reputation	Cultural Heritage
<b>1 NEGLIGIBLE</b>	<ul style="list-style-type: none"> <li>• Localised or extensive damage on a non-sensitive environment, which can be restored to functional equivalence within 2 months</li> </ul>	<ul style="list-style-type: none"> <li>• Communities and household assets / access / livelihoods not affected to any extent - some evidence of raised concerns (&lt;10 households)</li> <li>• Isolated number of complaints and/or grievances</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary or slight disturbance to local site</li> </ul>



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Category	Severity Description		
	Environment <sup>1,2</sup>	Social / Reputation	Cultural Heritage
		<ul style="list-style-type: none"> <li>Isolated incident of household opposition / protest</li> <li>Limited local NGO attention, no local media attention</li> </ul>	
<b>2</b> <b>MODERATE</b>	<ul style="list-style-type: none"> <li>Localised damage to a sensitive environment, which can be restored to functional equivalence within 2 months</li> <li>Localised or extensive damage to a non-sensitive environment, which can be restored to functional equivalence in 2-12 months</li> </ul>	<ul style="list-style-type: none"> <li>Localised / isolated incidences of minor impact on community and household assets / access / livelihoods (&lt;50 households).</li> <li>Several complaints and / or grievances</li> <li>Incidents of household opposition / protest by more than one household</li> <li>Prolonged local NGO attention, limited local media attention</li> </ul>	<ul style="list-style-type: none"> <li>Minor damage to site of local importance</li> </ul>
<b>3</b> <b>SIGNIFICANT</b>	<ul style="list-style-type: none"> <li>Extensive damage to a sensitive environment, which can be restored to functional equivalence within 2 months</li> <li>Localised damage to a sensitive environment, which can be restored to functional equivalence in 2-12 months</li> <li>Localised damage to a non-sensitive environment, which will take more than 12 months to restore to functional equivalence</li> </ul>	<ul style="list-style-type: none"> <li>Extensive incidences of minor impact on community and household assets / access / livelihoods (&gt;50 households)</li> <li>Numerous complaints and / or grievances from more than one location</li> <li>Local government concern</li> <li>Isolated protests by communities and households</li> <li>Prolonged local NGO attention, limited international NGO attention, prolonged local media attention, limited national media attention</li> </ul>	<ul style="list-style-type: none"> <li>Moderate damage to site of local / regional importance</li> </ul>
<b>4</b> <b>SEVERE</b>	<ul style="list-style-type: none"> <li>Extensive damage to a sensitive environment, which can be restored to functional equivalence in 2-12 months</li> <li>Extensive damage to a non-sensitive environment, which can be restored to functional equivalence within 3 years</li> </ul>	<ul style="list-style-type: none"> <li>Incidences of major impact on community and household assets / access / livelihoods (&gt;50 households).</li> <li>Large number of complaints and / or grievances</li> <li>Local government intervention, national government concern</li> <li>Prolonged protests by communities and households</li> <li>Prolonged local and international NGO attention, prolonged local and national media attention, limited international media attention</li> </ul>	<ul style="list-style-type: none"> <li>Severe damage / destruction of protected or nationally important site</li> </ul>



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Category	Severity Description		
	Environment <sup>1,2</sup>	Social / Reputation	Cultural Heritage
<b>5 CATASTROPHIC</b>	<ul style="list-style-type: none"> <li>• Extensive damage to a sensitive environment, which will take more than 12 months to restore to functional equivalence</li> <li>• Extensive damage to a non-sensitive environment, which will take more than 3 years to restore to functional equivalence</li> </ul>	<ul style="list-style-type: none"> <li>• Major impacts on community and household assets / access / livelihoods (&gt;100 households).</li> <li>• Large number of complaints and / or grievances</li> <li>• National government intervention</li> <li>• Prolonged and widespread community and household protests</li> <li>• Prolonged national and international NGO and media attention</li> </ul>	<ul style="list-style-type: none"> <li>• Severe damage / destruction of protected cultural site of international importance</li> </ul>
<p>Notes:</p> <p><sup>1</sup> Magnitude of environmental damage is relative to receptor sensitivity, spatial extent and or abundance</p> <p><sup>2</sup> Sensitive Environment defined as: Critical Habitat, EU priority Habitat, Protected Areas.</p>			

Corrective actions associated with each category of non-conformances are outlined in Table 8.

**Table 8 - Associated Corrective Actions**


Non-conformance Levels	Action Triggered
Category 5	<ul style="list-style-type: none"> <li>• Immediate corrective action required to rectify or stop the on-going non-conformance and to implement mitigation</li> </ul>
Category 4	<ul style="list-style-type: none"> <li>• Immediate corrective action or site-specific attention required to rectify or stop the on-going non-conformance and to implement mitigation</li> </ul>
Category 3	<ul style="list-style-type: none"> <li>• Corrective action or site-specific attention to rectify or stop the on-going non-conformance and/or to prevent the occurrence of environmental and social impacts</li> </ul>
Category 2	<ul style="list-style-type: none"> <li>• Corrective or preventive action or site-specific attention to ensure compliance with Project Standards, TAP and Contractor Management Plans</li> </ul>
Category 1	<ul style="list-style-type: none"> <li>• Corrective or preventive action or site-specific attention to ensure compliance with Project Standards, TAP and Contractor Management Plans.</li> </ul>

All ESCH non-conformances are tracked through to closure by the TAP ESCH team, presented and discussed in weekly TAP-Contractor ESCH and TAP cross functions construction meetings.

Level 1 – 3 non-conformances are addressed through TAP E&S Issues Tracking Register as described in Section 4.3 of this E&S Compliance Assurance Plan (CAL00-PMT-601-Y-TTM-0005).

Level 4 and 5 non-conformances are entered into the TAP NCR System and are subject to the formal NCR process below:

1. *Initiate* – The originating person (Contractor or TAP authorised user) submits the Non-Conformance Report by providing concise non-conformance description, indication of deviated

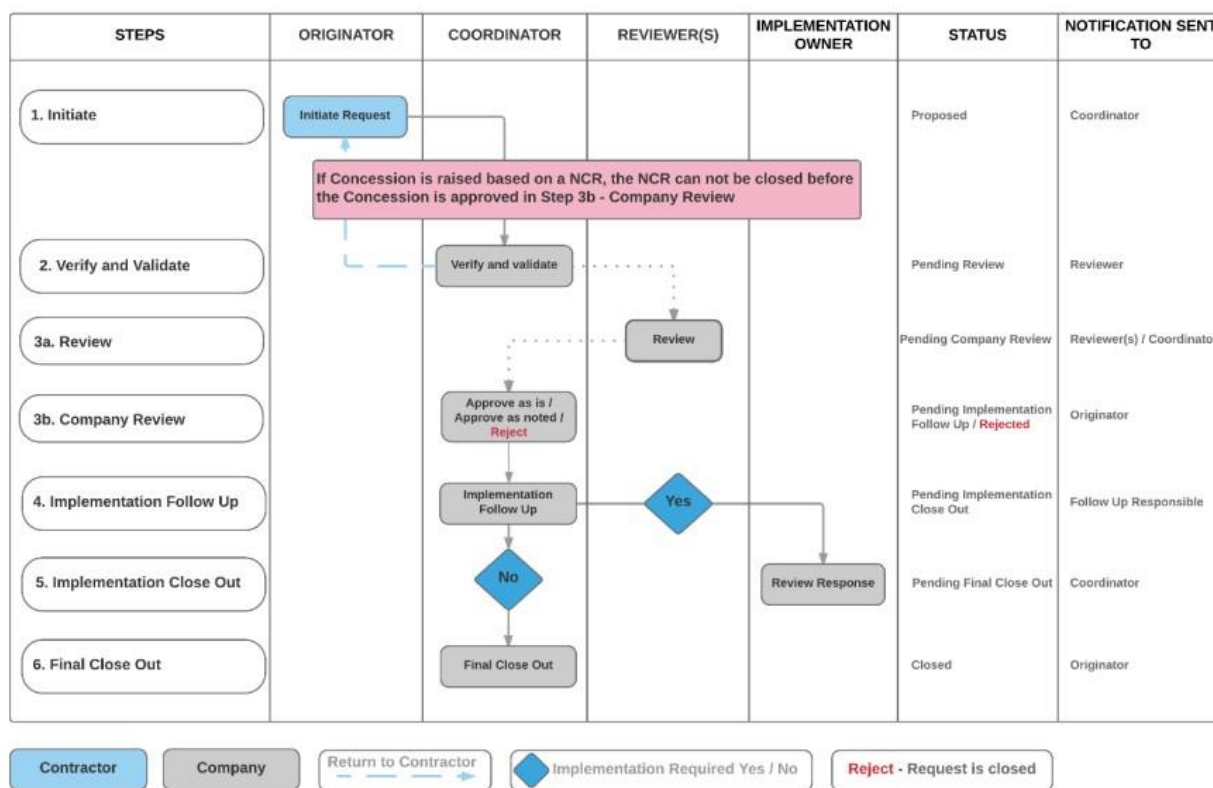
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requirement / procedure and identification of location/ area where the non-conformance occurred.

2. *Response* – The Contractor Lead in conjunction with TAP (and TAP Discipline Lead for TAP non-conformances) defines the Root Cause, proposed corrective actions and actions to prevent re-occurrence.
3. *Review* – Assigned Contractor / TAP reviewers confirm or comment on the proposed corrective actions. In the case of E&S Non-conformances, reviewers are the TAP E&S Manager and in-country Project Manager.
4. *Implement* – The Contractor Lead (TAP Discipline Lead for TAP non-conformances) finalises the non-conformance action plan and initiates implementation according to set due dates. As actions are implemented, the Contractor Lead (TAP Discipline Lead for TAP non-conformances) enters in the system relevant supporting documentation confirming implementation.
5. *Close Out* - TAP reviewers confirm, validate and close out non-conformance.

TAP NCR process is represented in the Figure 7.

**Figure 7 – TAP NCR Process**



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#### 5.4.2 ESCH Incident Reporting and Investigation

Incident management and associated reporting are addressed by H&S and ESCH Data, Incident Reporting and Investigation Document (TAP-HSE-PR-0011).

The highest potential severity description in Table 7 will be selected to classify non-conformances. All ESCH incidents and near misses are notified to the TAP ESCH functions in accordance with H&S and ESCH Data, Incident Reporting and Investigation Document (TAP-HSE-PR-0011).

The notification and reporting process to international financial institutions of ESCH incidents has yet to be finalised, once the incident categories, the trigger for notification and reporting, timescales, and format of reporting has been agreed a revision to this document will be made by TAP to detail the agreed process.


#### 5.4.3 Management of ESCH Change

This ESMP section refers to the sub-process of managing ESCH changes and fully integrates into the TAP Change Management Procedure (TAP-PRC-PR-0012) applicable to all Project changes (e.g. technical/construction, project schedule, financial etc.) Potential ESCH changes will include the following types of change:

- Activity and physical changes such as:
  - Project design and footprint changes (e.g. due to geotechnical, topographical, environmental, social etc. constraints) or re-routing of the RoW
  - New planned activity with potential environmental and social impacts which was not considered in the ESIA and addendums
  - Construction timing restrictions due to environmental sensitivities
- TAP standard and specifications changes:
  - Changes in regulations or new permit conditions
  - Changes to the TAP ESCH standards and specifications
  - Change to an avoidance, mitigation or management measures and commitments detailed in the ESIA or TAP ESCH Management Documents
- TAP ESCH management system changes:
  - Change to ESMP or TAP ESCH Management Documents

The objective of managing ESCH change is to ensure that changes are systematically screened to identify any environmental or social effects beyond those covered by existing environmental and social impact assessments and which require implementation of additional mitigation. The following process stages are considered

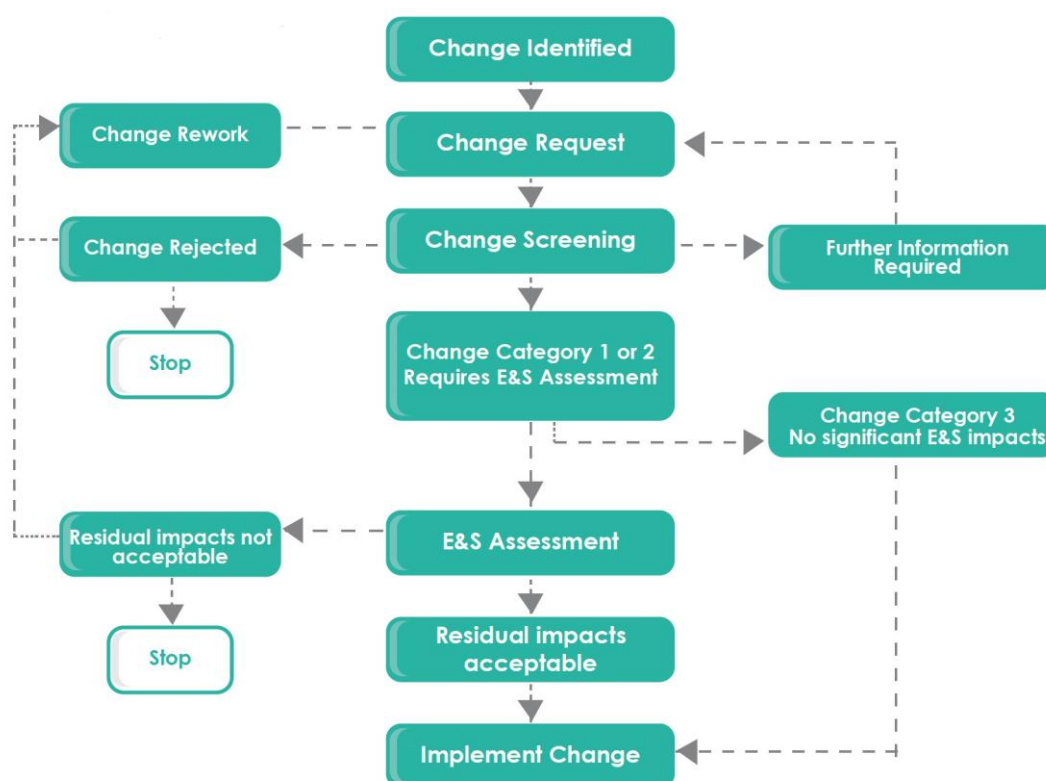
- Change identification (by TAP) / change request (by Contractor)
- Screening and internal review of permitting needs and external engagement initiatives with governmental and non-governmental stakeholders
- Change categorisation and environmental and social assessment

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- Approval/rejection and external notification.

This process is outlined in Figure 8 below.

**Figure 8 The ESCH Change Process**




#### 5.4.3.1 Change Identification or Change Request

ESCH changes are identified in a number of different ways:

- Formal change request by Contractor
- Formal change process used by the engineering and construction teams
- Direct request by TAP or Contractor to the E&S team
- Indirect request identified during meetings, reviews, audits, design verification/conformance and general assurance activities
- Review by E&S team of ESIPs, management plans etc. submitted by Contractor
- Results of environmental and social surveys or monitoring
- E&S team members' participation in IPMT construction coordination meetings.

The following information is collated to support screening and assessment of changes:

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- Description of change
- Justification of change
- Consequences of change, e.g. impact, cost, schedule
- Consequences if change is not implemented
- Locations affected, e.g. KP
- Permit implications
- Confirmation of compliance to TAP ESCH standards and specifications
- Summary of existing supporting evidence
- Summary of further ESIA requirements, if applicable
- Any third-party consultation required.

#### **5.4.3.2 ESCH assessment and notification**

ESCH changes will be assessed and categorised by the ESCH team, led by the TAP E&S Manager in conjunction with the relevant functional teams and where appropriate the country offices. A standard approach will be used to initially screen the change and then document the assessment of the change and supporting mitigative measures, compliance to TAP ESCH standards and specifications, and, if necessary, external engagement prior to the change being implemented. A separate internal TAP ESCH Change Management Guidance Note defines the steps and change form templates that will be used to document the screening, assessment and acceptance process.


The ESCH assessment includes review of potential residual impacts upon implementation of proposed mitigation. The assessment process detailed in the Supplementary Ecological Assessment (CAL00-C5577-640-Y-TRS-0002) will be used incorporating social severity indicators. For the changes which are subject to a formal environmental permitting or environmental impact assessment procedure under national law, the compliance of the proposed change with Project ESCH standards and specifications will be confirmed. To support notification and reporting of ESCH change, TAP changes will be categorised into three levels.

#### **Changes Category 1**

- Activity and physical changes that will potentially result in significant residual impact even if mitigation measures are fully implemented
- Standard and specification changes that will result in a significant residual impact
- Management system changes that result in material modifications to mitigative measures and will potentially result in a significant residual impact

#### **Changes Category 2**

- Activity and physical changes that will occur in a critical habitat or a socially sensitive area not included in the approved ESIAs or permitting documentation but will not result in significant residual impact if planned mitigation measures are fully implemented.

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- TAP ESCH standard and specification changes that will occur in a critical habitat or a socially sensitive area but will not result in significant residual impact if planned mitigation measures are fully implemented.
- TAP ESCH management system changes that result in material modifications to mitigative measures in critical habitat or a socially sensitive area but will not result in significant residual impact if planned mitigation measures are fully implemented.

### Changes Category 3

- Changes which do not fall within either category 2 or 1.

The notification and reporting process to international financial institutions of ESCH change has yet to be finalised. Once the change categories, the reporting and notification and, where applicable, approval process(es), timescales, as well as format of the reporting is agreed, a revision to this document will be made by TAP to detail the agreed ESCH change notification and reporting process.

## 5.5 ESCH Training and Competency

### 5.5.1 TAP Personnel

TAP is committed to ensuring that training management requirements stipulated within TAP ESCH standards and specifications are implemented and that any training management undertaken complies with the TAP commitments and international best practice.


Competency and experience of TAP personnel is verified during the assessment and selection as part of the recruitment process. Following the appointment TAP personnel receive ongoing ESCH training in the form of HSSSE induction training to ensure that the Project health, safety, environmental, socio-economic (including human rights impacts) and cultural heritage expectations are met. In addition, TAP personnel undertake any specific ESCH training commensurate with their roles.

### 5.5.2 Contractor Personnel

Contractor training management requirements are stipulated within Employment, Training and Worksite Management CCPs and outlined within corresponding ESIPs developed by the Contractors. TAP maintains an active role in managing Contractor training requirements (e.g. in the form of reviewing and approving Contractor training materials, monitoring the implementation of and adherence to training procedures by Contractors and providing advice to Contractors on training management issues as required). TAP may also choose to participate in and/or lead some of the Contractors' training procedures as required.


ESCH Training is delivered as part of the Contractor Induction course, skills training and stakeholder engagement and corporate social responsibility (CSR) training are provided on an ongoing basis. Contractors have rolled out programmes on the following ESCH topics:

- careful use of resources (e.g. water consumption)
- environmental, social and cultural heritage requirements, including:
  - wildlife and habitat protection

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- ecological issues (e.g. awareness training)
- general construction best practices to safeguard ecological resources such as flora, fauna, watercourses and habitats
- local specific constraints and risks
- spill prevention
- cultural heritage issues
- control of disruptive noisy activities
- land access
- waste management, etc.

TAP monitors and evaluates the efficiency and timely delivery of Contractor training and that all Contractor personnel are suitably qualified, competent and fit for their tasks as part of the ESCH Compliance Assurance process.

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## 6. Management and External Review

### 6.1 Management review

Management Review is the last element of the ESMP Cycle (Figure 2), closing the adaptive management feedback loop. TAP and Contractor management reviews are undertaken at several levels within the TAP organisation and include the following:

- TAP monthly performance reviews
- TAP extended leadership team meetings
- Contractor weekly and monthly ESCH functional and project cross functional reviews
- Weekly project management leadership meetings
- Quarterly TAP HS and ESCH leadership committee meetings
- Weekly and monthly ESCH function meetings.


TAP senior management periodically (annually as a minimum) review the overall effectiveness of the ESCH management system. The purpose of the ESCH Management Review is three-fold:

- To provide management with a summary of ESCH performance over the year, including:
  - Non-conformities and corrective actions
  - Monitoring and measurement results
  - Audit results
  - Shareholder and stakeholder feedback and concerns
  - Issues concerning external stakeholders
  - Adequacy of ESCH resources
  - Process performance
  - Regulatory changes
  - ESCH incident trends, response and reporting
- Identify opportunities for continual improvement
- Summarise the significant E&S risks and their proposed mitigation in the following period.

The annual ESCH Management Review is used to develop the Annual ESCH Activity Plan and targets for the following year to identify:

- Continual improvement opportunities
- Any need for changes to the ESCH Management System, including resource needs.




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## 6.2 External Review


TAP will develop an independent external monitoring group involving project affected stakeholders and third-party representatives in monitoring of TAP's Project's socio-economic, environmental and cultural heritage performance in Greece, Albania and Italy with focus on construction, reinstatement and initial operations activities. By the end of January 2018 TAP will issue externally on its website the Terms of Reference for the independent external monitoring group. By the end of 1st Quarter 2018 TAP will issue externally on its website a work plan agreed with the external monitoring group that will include:

- Background information
- Duties and coordination
- Group membership
- 2018 monitoring visit and reporting schedule
- Reporting and disclosure process


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## 7. References


Title	Document Reference
<b>TAP General Documents</b>	
Code of Conduct	TAP-GEN-PO-0001
CSR Policy	TAP-HSE-PO-0002
Health, Safety and Environment (HSE) Policy	TAP-HSE-PO-0001
Corporate Security Policy	TAP-HSE-PO-0010
Quality Policy	TAP-QRM-PO-0001
Consolidated ESMS Project Standards Document	CAL00-PMT-601-Y-TSP-0001
Contractor's ESMS Framework Document	CAL00-RSK-601-Y-TTM-0001
E&S Compliance Assurance Plan	CAL00-PMT-601-Y-TTM-0005
Ecological Management Plan	CAL00-PMT-601-Y-TTM-0007
Erosion Control and Reinstatement Management Plan	CPL00-PMT-100-F-TTA-0001
Bio-restoration Management Plan	CAL00-PMT-601-Y-TTM-0002
Watercourse Crossing Plan	CAL00-PMT-601-Y-TTM-0003
Waste Management Plan	CAL00-PMT-601-Y-TTM-0001
Social Impact Management Plan	CAL00-PMT-601-Y-TTM-0004
Route Social Impact Plan	CAL00-PMT-601-Y-TTA-0001
Grievance Management Framework	CPL00-PMT-601-Y-TVO-0001
Third Party Grievance Mechanism	Available at: <a href="http://www.trans-adriatic-pipeline.com">http://www.trans-adriatic-pipeline.com</a>
Social & Environment Investment Strategy	TAP-CSR-ST-0002
Industrial Relations Management Plan	CAL00-PMT-000-B-TTM-0004
Health and Safety Plan	CAL00-PMT-000-S-TPA-0002
HSE Data, Incident Reporting and Investigation	TAP-HSE-PR-0011
Crisis and Emergency Response Strategy	TAP-HSE-ST-0011
Crisis and Emergency Response Plan	TAP-HSE-PL-0007
Change Management Procedure	TAP-PRC-PR-0012_6
Non-Conformance Procedure	CAL00-PMT-000-V-TPQ-0001

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Title	Document Reference
<b>TAP Albania Documents</b>	
Community Safety and Security Plan	AAL00-RSK-601-Y-TTM-0016
Cultural Heritage Management Plan	AAL00-PMT-601-Y-TTM-0002
Stakeholder Engagement Plan	TAP-CEA-PL-0002
Albania Third Party Grievance Procedure	AAL00-PMT-601-Y-TPG-0001
Livelihoods Restoration Plan	AAL00-PMT-660-X-TTA-0001
Offshore Community Safety and Security CCP	AAL00-RSK-601-Y-TTM-0031
Offshore Compliance Monitoring CCP	AAL00-RSK-601-Y-TTM-0032
Offshore Employment, Training and Worksite Management CCP	AAL00-RSK-601-Y-TTM-0033
Offshore Spill Prevention and Response CCP	AAL00-RSK-601-Y-TTM-0029
Onshore Community Safety and Security CCP	AAL00-RSK-601-Y-TTM-0009
Onshore Compliance Monitoring CCP	AAL00-RSK-601-Y-TTM-0006
Onshore Employment, Training and Worksite Management CCP	AAL00-RSK-601-Y-TTM-0012
Onshore Spill Prevention and Response CCP	AAL00-RSK-601-Y-TTM-0010
Stakeholder Engagement and CSR CCP	TAP-ASM-PR-0001
<b>TAP Greece Documents</b>	
Community Safety and Security Plan	GAL00-ENT-601-Y-TTM-0016
Cultural Heritage Management Plan	GAL00-PMT-601-Y-TTM-0002
Stakeholder Engagement Plan	TAP-CEA-PL-0003
Greece Third Party Grievance Procedure	GAL-PMT-601-Y-TPG-0001
Livelihoods Restoration Plan	GAL00-PMT-660-X-TTA-0001
Employment, Training and Worksite Management CCP	GAL00-ENT-601-Y-TTM-0012
Community Safety and Security CCP	GAL00-RSK-601-Y-TTM-0009
Compliance Monitoring CCP	GAL00-ENT-601-Y-TTM-0006
Spill Prevention and Response CCP	GAL00-ENT-601-Y-TTM-0010
Stakeholder Engagement and CSR CCP	TAP-ASM-PR-0002
<b>TAP Italy Documents</b>	
Community Safety and Security Plan	IAL00-RSK-601-Y-TTM-0027

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Title	Document Reference
Cultural Heritage Management Plan	IAL00-PMT-601-Y-TTM-0002
Stakeholder Engagement Plan	TAP-CEA-PL-0005
Italy Third Party Grievance Procedure	IAL00-PMT-601-Y-TPG-0001
Livelihoods Restoration Plan	IAL00-PMT-660-X-TTA-0001
Offshore Community Safety and Security CCP	IAL00-RSK-601-Y-TTM-0009
Offshore Compliance Monitoring CCP	IAL00-RSK-601-Y-TTM-0023
Offshore Employment, Training and Worksite Management CCP	IAL00-RSK-601-Y-TTM-0024
Offshore Spill Prevention and Response CCP	IAL00-RSK-601-Y-TTM-0020
Onshore Community Safety and Security CCP	IAL00-RSK-601-Y-TTM-0022
Onshore Compliance Monitoring CCP	IAL00-RSK-601-Y-TTM-0006
Onshore Employment, Training and Worksite Management CCP	IAL00-RSK-601-Y-TTM-0012
Onshore Spill Prevention and Response CCP	IAL00-RSK-601-Y-TTM-0010
Stakeholder Engagement and CSR CCP	TAP-ASM-PR-0003
<b>External Documents</b>	
EBRD Environmental and Social Policy	Available online at: <a href="http://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html">http://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html</a> [Accessed 07/03/2016]

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Title	Document Reference
EBRD Performance Requirements	Available online at: <a href="http://www.ebrd.com/who-we-are/our-values/environmental-and-social-policy/performance-requirements.html%20">http://www.ebrd.com/who-we-are/our-values/environmental-and-social-policy/performance-requirements.html%20</a> [Accessed 08/03/2016]
IFC Performance Standards on Environmental and Social Sustainability	Available online at: <a href="http://www.ifc.org/wps/wcm/connect/115482804a0255db96fbffd1a5d13d27/PS_English_2012_Full-Document.pdf?MOD=AJPERES">http://www.ifc.org/wps/wcm/connect/115482804a0255db96fbffd1a5d13d27/PS_English_2012_Full-Document.pdf?MOD=AJPERES</a> [Accessed 07/03/2016]
EIB Environmental and Social Handbook, Volume I: EIB Environmental and Social Standards and Volume II:	Available online at <a href="http://www.eib.org/attachments/strategies/environmental_and_social_practices_handbook_en.pdf">http://www.eib.org/attachments/strategies/environmental_and_social_practices_handbook_en.pdf</a> [Accessed 21/04/16]
Voluntary Principles on Security and Human Rights	Available online at: <a href="http://www.voluntaryprinciples.org/files/Implementation_Guidance_Tools.pdf">http://www.voluntaryprinciples.org/files/Implementation_Guidance_Tools.pdf</a> [Accessed 07/03/2-16]
OECD Guidelines for Multinational Enterprises	Available online at: <a href="http://www.oecd.org/daf/inv/mne/48004323.pdf">http://www.oecd.org/daf/inv/mne/48004323.pdf</a> [Accessed 05/05/2016]