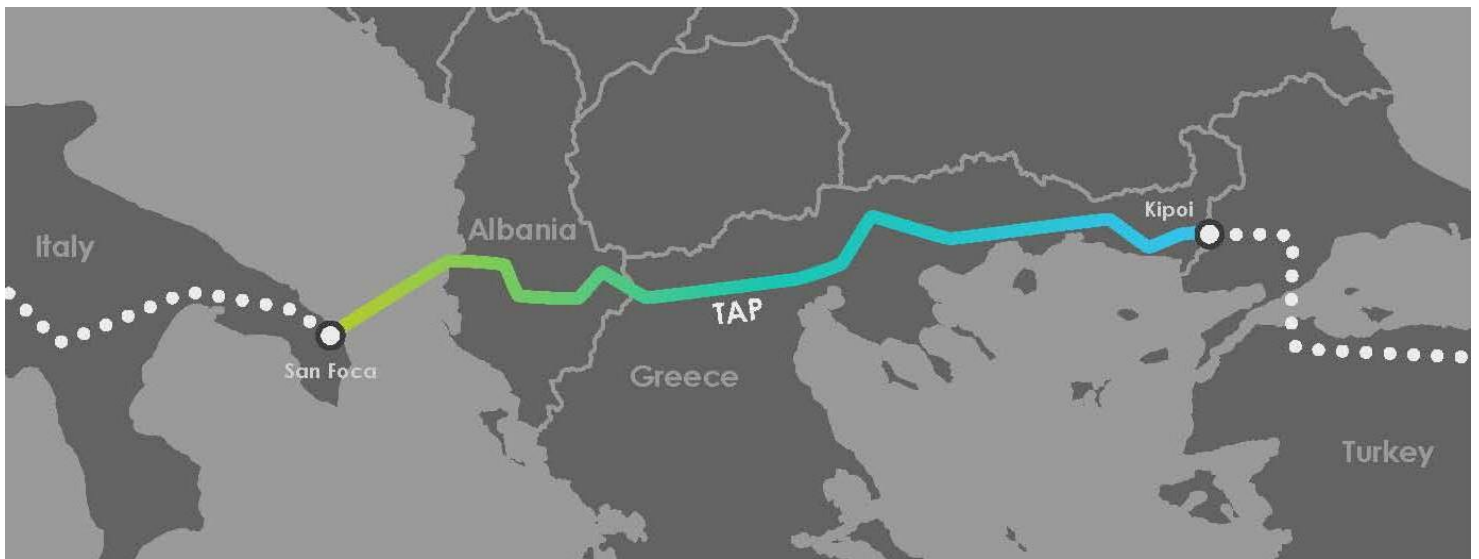




Trans Adriatic
Pipeline



Social Impact Management Plan




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Glossary of Terms

Benefits	The assistance, financial and otherwise, provided to Project Affected People in excess of compensation for loss of assets and disruption to household or livelihood activities. The net benefits provided by the project to improve living standards and livelihoods.
Company	Trans Adriatic Pipeline AG
Compensation	Payment in cash or in kind for an asset or resource affected by the project, or for disruption to household or livelihood activities. Compensation is designed to enable the restitution of existing assets and resources and fair recompense for time lost or inconvenience experienced by Project Affected People.
Contractor	Engineering, Procurement and Construction (EPC) Contractors and their sub-contractors.
Cultural heritage impact	A change to cultural heritage (in this context 'cultural heritage' refers to any tangible (e.g. objects, artefacts, structures, spaces) or intangible element that is of value or importance to people's culture, history and/or identity) which has occurred as a result of project activities. Impacts may be considered to be positive or negative.
Cumulative impacts	The successive, incremental and combined impacts of one or more projects (existing, current and foreseeable future projects) on society, the economy or the environment. They can result from the aggregation and/or interaction of impacts within a social or environmental system and are defined from the perspective of the people or environment experiencing them.
Direct impact	Impact that occurs as a direct result of project intervention (may also be called primary impact or first order impact), such as access to land, road closures, interruption of power or water supplies, the disturbance of people by noise generated by machinery associated with the project.
Economic Displacement	Loss of income streams or means of livelihood resulting from land acquisition or restricted access to resources (such as land, water, or forest) resulting from construction or operation of the project or its associated facilities.
Economically Displaced Households	Households whose livelihoods are impacted by the project, which can include both resident households and those who live outside the project area but have land, crops, businesses or various usage rights in the project area.
Entitlements	The benefits, set out in the Livelihood Restoration Plan, which will be provided to displaced households and individuals. These may include financial compensation, the right to participate in livelihood restoration programmes, housing, resettlement sites, service and infrastructure provision, and transport and other short-term assistance required to resettle or relocate.
Environmental impact	A change to the environment. In this context, the 'environment' refers to any aspect of the natural or semi-natural physical environment (such as air, water, soil) which has occurred because of project activities. Impacts may be positive or negative.
Environmental and Social Standards	Performance Standards mandated by project shareholders, lender institutions and other agencies for project environmental and social management.
Grievance	Any perceived concern evoking an individual or group's sense of entitlement or having been wronged, based on law, contract, explicit or implicit promises, customary practice or general notions of fairness.


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Grievance Mechanism	Process to address complaints that can be accessed by individuals, workers, communities and/or civil society organisations who are or feel they are being negatively affected by the activities of a project or business.
Indicator	Quantitative or qualitative factor or variable that provides a simple and reliable means to measure the performance of impact management intervention.
Indirect Impact	An impact which occurs because of another change which is caused by a project intervention, such as a physical change to the environment or economic impacts. These can also be secondary effects, second or higher order effects.
Kilometre Points	Kilometre Points (KPs) relating to the pipeline route as per the base case described in TAP Environmental and Social Impact Assessments. KPs may change as a result of re-routing the pipeline.
Land Acquisition	Transactions resulting in the acquisition of land, including land use or access rights. Land acquisition may include both outright purchases of property and acquisition of access rights, such as easements or Rights of Way.
Livelihood	The range of means that individuals, families, and communities use to make a living, such as wage-based employment, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade, and bartering. In the broader sense of sustainable livelihood, it may also encompass the broader processes – such as education, health, natural resource management, market access and governance – that enable people to develop and maintain livelihoods over time.
Livelihood Restoration Plan	The management plan produced as part of the project land acquisition and resettlement process to restore and enhance people's livelihoods after being physically or economically displaced.
Monitoring and Evaluation	<p>Monitoring and evaluation is a process designed to help improve management performance and achieve desired outcomes. The goal is to improve current and future management of outputs, outcomes and impact.</p> <p>Monitoring is a continuing function that aims primarily to provide project management with early indications of progress, or lack thereof, in the achievement of results. Monitoring helps track achievements by regular collection of information to assist timely decision making, ensure accountability, and provide the basis for evaluation and learning.</p> <p>Evaluation is the systematic and objective assessment of an ongoing or completed project, programme, or policy, and its design, implementation and results. The aim is to determine the relevance and fulfilment of objectives, management efficiency, effectiveness, impact, and sustainability. Evaluation should provide information that is credible and useful, enabling the incorporation of lessons learned into the decision-making process.</p>
Perceived Impact	Something that is believed to be a potential impact rather than something that is established as being an actual impact. Perceived impacts affect how people feel about the project and how they feel and behave generally, thus perception is reality for them.
Pipeline	Proposed pipeline scheme, including related facilities such as access roads, compressor stations, etc.
Physical Displacement	Loss of shelter and assets resulting from the acquisition of land associated with the development or operation of the project or its associated facilities that requires the affected person(s) to move to another location.
Project Affected Person	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

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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.

Social Impact Management Plan	A formal document and associated management system that outlines the strategies to be undertaken during the various phases of project development to monitor, report, evaluate, review and proactively respond to project-induced social impacts.
Social Performance	The interface between the project and society: the configuration of principles of social responsibility, processes of social responsiveness, and policies, programmes, management strategies and observable outcomes as they relate to the project's societal relationships.
Socio-economic impact	A change to the existing socio-economic environment that occurs because of project activities. Social factors may include aspects such as demographics, health and well-being and may refer to individuals, groups or wider communities of people. Economic factors may include aspects such as employment, government or household finances, livelihoods. An impact may be positive or negative.
Stakeholder	Any person, group or organisation who may be affected by the project and may in turn affect project design, development or operation.
Trans Adriatic Pipeline (TAP) project	Pipeline to bring natural gas from the Caspian region to Europe.
Vulnerable Persons	People 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, 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

CCP	Contractor Control Plan
CLC	TAP Community Liaison Coordinator
CLO	EPC Contractor Community Liaison Officer
CO	Country Office
CSO	Cadastral Survey Office
CSR	Corporate Social Responsibility
EBRD	European Bank for Reconstruction and Development
EIB	European Investment Bank
EPC	Engineering, Procurement and Construction Contractor
ESCH	Environmental, Social and Cultural Heritage
ESIA	Environmental and Social Impact Assessment
EU	European Union
GA	Government Affairs
GIS	Geographic Information System
GLAC	Guide to Land Easement, Acquisition and Compensation
HGA	Host Government Agreement
IFC	International Finance Corporation
IPMT	Integrated Project Management Team
IPRO	Immovable Property Registration Offices
KP	Pipeline Kilometre Point
KPI	Key Performance Indicator
LEA	Land Easement and Acquisition
LGU	Local Government or Administrative Unit
LM	Land Management
LRF	Livelihood Restoration Framework
LRP	Livelihood Restoration Plan
MoM	Minutes of Meeting
NGO	Non-Governmental Organisation
OECD	Organisation for Economic Co-operation and Development
PAPs	Project Affected People
PPS	Pipeline Protection Strip
PR	Performance Requirement
RoW	Right of Way
SEAP	Stakeholder Engagement Action Plan
SEI	Social and Environmental Investment
SEP	Stakeholder Engagement Plan
SFM	TAP Social Field Monitor
SGMT	Stakeholder and Grievance Management Tool
SLA	Secure Land Access
TAP	Trans Adriatic Pipeline
TEP	Tier 1 Engagement Plan

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Executive Summary

This Social Impact Management Plan (SIMP) describes the TAP project framework for social impact management. The SIMP identifies the likely scale and nature of impacts in relation to land access, livelihoods and construction activities. It describes the integrated impact management programmes which ensure consistent and effective management of social impacts throughout the project:


- Land and Easement Acquisition (LEA) programme
- Livelihood Restoration Programme (LRP)
- Environmental and Social Management System (ESMS)
- Route Social Impact Plan (RSIP)
- Grievance Management Mechanism

The SIMP also identifies processes that address associated areas of social impact:

- Industrial Relations Management Plan (IRMP)
- Cultural Heritage Management Plan (CHMP)
- Stakeholder Engagement Plan (SEP)
- Social and Environmental Investment Programme (SEIP)

The SIMP describes the integration and alignment of TAP social management functions at the corporate level, through the TAP assurance and stakeholder management teams' oversight of social and environmental management and stakeholder relations and, at country level, through the coordination of land management, social and environmental management and Country Office teams.

The SIMP describes the TAP project's social performance monitoring and compliance assurance, including monitoring, audit and inspection programmes; the establishment of constraints and mitigation measures; and the identification of non-conformances and required corrective actions.

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1. Introduction

1.1 Purpose

This Social Impact Management Plan (SIMP) describes the activities undertaken by the Trans Adriatic Pipeline (TAP) project to identify and mitigate project-related social impacts. The SIMP:

1. Describes TAP's approach to ensuring the mitigation of project-associated social impacts in the critical areas of land access and livelihood restoration, construction management, employment and local content management, and cultural heritage. It also describes cross-cutting activities such as route-based social-impact management, stakeholder engagement, social investment, grievance management, and monitoring and evaluation of project performance.
2. Provides a management tool to inform and guide TAP staff and Contractors regarding the processes to be followed to mitigate social impacts
3. Supports the alignment and integration of TAP social performance functions to optimise efficiency in the management of social impacts and ensure smooth project implementation.
4. Provides clarity to project lenders and other external stakeholders on the roles, responsibilities and actions undertaken by TAP social performance functions and how these are aligned and executed.

The SIMP will be regularly updated as the project progresses. Updates may be triggered by, for example, changes in the construction programme or schedule, changes in the broader social environment, or the changing nature of social impacts at various project stages. This current edition of the SIMP reflects the social mitigation activities during and immediately following construction activities.


1.2 Objectives

The objective of the SIMP is to ensure the effective management of social impacts associated with the TAP project. TAP seeks to avoid social impacts wherever possible. Where avoidance is not possible, it seeks to minimise the duration, intensity and extent of impacts, and to ensure full restoration of any residual impacts. Social mitigation measures should result in measurable improvement in the economic conditions and well-being of affected people and communities.

1.3 Scope

The SIMP represents an impact management framework. It comprises the following closely-related social impact management programmes, which collectively ensure the effective management of all social impacts throughout the TAP project:

- Land and Easement Acquisition (LEA) programme
- Livelihood Restoration Programme (LRP)

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- Environmental and Social Management System (ESMS)
- Route Social Impact Plan (RSIP)
- Grievance Management Mechanism.

Social management programmes address specific impacts, target populations and geographies. They are designed to be mutually reinforcing, particularly where impacts occur at different levels or affect different populations. For example, livelihood impacts among landowners and land users in the Right of Way (RoW) are mitigated through the LEA programme and LRP, but livelihood impacts among non-landowners or land users, or businesses or households located outside the RoW, may be mitigated through the RSIP. The RSIP provides an additional level of assurance by identifying and addressing residual impacts, such as impacts in businesses and loss of income, that may not have been identified during the pre-construction phases of the project or mitigated through the LEA and LRP.

The SIMP ensures integration of the project social management programmes and associated processes such as the Industrial Relations Management Plan [CAL00-PMT-000-B-TTM-0004], Cultural Heritage Management Plan [GAL00-PMT-601-Y-TTM-0002 for Greece, AAL00-PMT-601-Y-TTM-0002 for Albania, IAL00-PMT-601-Y-TTM-0002 for Italy], Stakeholder Engagement Plan [TAP-CEA-PL-0002 for Albania, TAP-CEA-PL-0003 for Greece, TAP-CEA-PL-0005 for Italy] and Social and Environmental Investment Strategy [TAP-CSR-ST-0002], through TAP's management organisation, monitoring and assurance.

The scope of TAP social impact management programmes and associated processes is described in Table 1.




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Table 1 Scope of TAP social impact management programmes


Programme	Target Population	Scope of Impacts	Geographical Scope
Land and Easement Acquisition	Landowners and land users identified in census and asset verification survey	Loss of land Loss of crops Loss of pasture Loss of, or damage to, structures Removal of on-ground installations Orphan land Infrastructures and services Vulnerability	Project Right of Way
Livelihood Restoration	Landowners and land users	Disturbance of agricultural or other livelihood activities Loss of income Vulnerability	Project Right of Way
Environmental and Social Management System	All populations in project-affected areas Government authorities in project-affected areas	Community cohesion Community disturbance/nuisance Additional land take Employment Community health, safety and security Infrastructure and services	Project-affected areas: <ul style="list-style-type: none"> • Project Right of Way • Neighbouring communities • Ports • Transport corridors

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Programme	Target Population	Scope of Impacts	Geographical Scope
Route Social Impact Plan	Populations in project-affected areas Government authorities	Community disturbance/nuisance Additional land take Local business impacts Livelihoods Employment Community health, safety and security Infrastructure and services Vulnerability	Project-affected areas: <ul style="list-style-type: none"> • Project Right of Way • Neighbouring communities • Ports • Transport corridors
Industrial Relations Management Plan	Populations in project-affected areas Local businesses / contractors	Recruitment Employment Training Local contracting/procurement Workplace management Worker accommodation Retrenchment	Project-affected area
Cultural Heritage Management Plan	National population Government authorities	Existing cultural heritage resources Chance finds Intangible cultural heritage	Project Right of Way
Stakeholder Engagement Plan	Populations in project-affected areas Government authorities	Reputation Community perceptions Construction schedule/operations Community health, safety and security	Project-affected areas

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Programme	Target Population	Scope of Impacts	Geographical Scope
Social and Environmental Investment	Populations in project-affected areas National programmes	Reputation Construction schedule/operations Livelihoods Community quality of life Education and training Environmental management	National
Grievance Management Mechanism	Populations in project-affected areas	Reputation Community perceptions Construction schedule/operations Community disturbance Livelihoods Employment	Project-affected areas


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2. TAP Social Impact Management Principles

2.1 Guiding Principles

TAP social impact management is based on the following core values and principles:

- The project operates always in **compliance with all applicable laws, standards and policies**, all mitigation measures, including compensation or livelihood assistance, and complies with national legislation and applicable international standards.
- **The project seeks to avoid social impacts wherever possible.** Where avoidance is not possible, it seeks to minimise the duration, intensity and extent of impacts, and it ensures full restoration (for example, of land, livelihoods, people's quality of life) of any impacts that cannot be completely avoided or minimised.
- **The project prioritises the welfare and livelihoods of affected persons and households** in determining appropriate construction methodologies, schedules and other mitigation measures
- **The project recognises that social impacts may be directly related to TAP construction activities or may be indirect impacts occasioned by changes in, for example, the natural environment or regional economy** attributable to project activities. All such impacts – direct or indirect – are assessed and mitigation measures established which are fair, transparent and commensurate with the impact.
- **The project pays particular attention to the needs of vulnerable individuals and households** who may be functionally limited in their ability to participate in consultation and decision-making, to adapt to new circumstances, to restore their livelihoods or to benefit from project opportunities.
- **The project recognises the legitimate rights and interests of all individuals, groups and communities who are affected by the project.** It defines Project-Affected Persons inclusively as both those whose land, crops and other assets are located within the Right of Way and others whose amenity, living standards, safety or security may be affected by the project.
- **The project recognises the rights of individuals, groups and communities to define themselves as project stakeholders** and to express their legitimate interests and concerns about the project. The project always engages with stakeholders in an honest, equitable and transparent manner.

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2.2 TAP Corporate Social Policy

2.2.1 TAP CSR Policy

A detailed discussion of TAP's Policy on Corporate Social Responsibility is provided on the Company Website (<https://www.tap-ag.com>). This provides a clear statement of TAP's commitment to manage its social and environmental impacts, to maintain its social license to operate, and to develop enduring stakeholder relationships that will sustain local community support. The policy statement recognises the critical need to develop the strategies, plans and review processes that will ensure delivery of its commitments.

2.2.2 TAP Code of Conduct

TAP Code of Conduct, *Living Our Values*, defines the behavioural standards required of project personnel. The code is applied to the TAP organisation and its individual employees, board members, third parties, Contractor personnel and others who act on TAP's behalf. It aims to minimise project risk, ensure professional project management and responsible behaviour, maintain TAP's reputation and ensure that it is considered a professional and reliable partner by customers and other business partners. It is designed to preserve and foster the integrity and reputation of TAP.

In concrete terms, the code emphasises the importance of ensuring compliance with legal and regulatory requirements, as well as with the project's internal policies and directives, while upholding good market practices at all times. The code recognises that, while it provides a broad range of guidelines for proper business conduct and for preserving integrity, it cannot address every situation that project personnel are likely to encounter. It stresses, therefore, that personnel should not only follow the code up to the 'letter of law' but also consider the broader meaning of the document and the importance of complying with the 'spirit of the law'.

The code affirms the responsibility of company and project personnel to exercise good judgment, act in an ethical and socially responsible manner and within the laws, customs and traditions of the countries in which TAP operates, and to remain accountable for their actions.

2.3 International Standards and Guidelines

The TAP project is committed to compliance with the European Bank for Reconstruction and Development Performance Requirements (EBRD PR), revised in 2014. The key EBRD Requirements and TAP project compliance measures are summarised in Table 2 below.



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Table 2 EBRD Performance Standards and project compliance measures


EBRD Performance Standards	Compliance measures adopted by TAP
PR 1: Environmental and Social Appraisal and Management	<ul style="list-style-type: none"> Environmental and Social Management Plan Environmental and Social Management Systems Social Impact Management Plan Biodiversity Action Plan Landscape Management Plan Waste Management Plan Water Management Plan Decommissioning Impact Assessment
PR 2: Labour and Working Conditions	<ul style="list-style-type: none"> Employment Management Plan Recruitment Management Plan Local Content Management Plan Employee Accommodation Standards Worker Grievance Procedure Health, Safety and Security Plan Purchasing strategy
PR 4: Community Health, Safety and Security	<ul style="list-style-type: none"> Community Health, Safety and Security Plan Traffic Management Plan Schools safety awareness training Community notification Physical barriers and signage at work sites Emergency Response Plan Voluntary health screening Employee Code of Conduct
PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement	<ul style="list-style-type: none"> Land Access and Easement programme Livelihood Restoration Plan Infrastructure and Utilities Management Plan
PR 8: Cultural Heritage	<ul style="list-style-type: none"> Cultural Heritage Management and Monitoring Plan Chance Finds procedure Archaeological delineation and marking of site boundaries Staff cultural heritage training Employee Code of Conduct
PR 10. Information Disclosure and Stakeholder Engagement	<ul style="list-style-type: none"> Stakeholder Engagement Plan Social and Environmental Investment Plan Annual Report

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Other applicable standards include:

- European Investment Bank (EIB) E&S Standards, 2013
- Equator Principles III, 2013 (EPIII)
- IFC Performance Standards, 2012 (IFC PS)
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, 2011.

The SIMP will ensure that the TAP project complies with these standards in all aspects of social impact management throughout the life of the project.

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3. The TAP Project

The TAP project will transport Caspian natural gas through the Southern Gas Corridor to Europe (Figure 1). Connecting with the Trans Anatolian Pipeline (TANAP) at the Greece-Turkey border, TAP will cross Northern Greece, Albania and the Adriatic Sea before coming ashore in Southern Italy to connect to the Italian natural gas network. The project has concluded Environmental and Social Impact Assessments (ESIAs) in each host country, ensuring that decisions regarding the pipeline route respect environmental, social and culturally sensitive areas wherever possible.

Figure 1 The Southern Gas Corridor




The project is currently in its construction phase which started in Albania in the summer of 2015. The construction of the TAP pipeline and its related facilities will take place in stages. It will be influenced by weather conditions and, in some cases, seasonal restrictions. Construction along the pipeline Right of Way (RoW) will typically be sequenced over a period of three to six months. However, overall access to land will be required for a longer period to allow for continuing RoW access for transportation and other associated construction activities. In total, this could last between 12 and 24 months, inclusive of the intense construction periods. All land used will be reinstated to at least its original condition. TAP will pay compensation for the total amount of disturbance time (that is, for the actual disturbance time or for 24 months, whichever is greater) when the land is being used.

3.1 Onshore Pipeline Construction

The onshore section of TAP will be approximately 773 kilometres in total (Greece 550km, Albania 215km, Italy 8km). The onshore pipeline will have a diameter of 48 inches (1.2 metres) while the diameter of the offshore segment will be 36 inches (0.91m).

Onshore pipe-laying work will be undertaken in 'spreads' at several locations across the entire pipeline route, rather than starting at one end and working towards the other. There will be approximately 15 camp sites along the entire route, with 150 to 200 staff at each site.

Techniques such as horizontal directional drilling will be used for crossing roads and rivers. Special care will be taken to minimise any adverse effect on the environment during construction.

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Once built, the onshore pipeline will be buried at least one metre beneath the ground and therefore not visible for the entire route. Only facilities such as the pipeline receiving terminal, compressor and block valve stations will be above ground and designed, constructed and screened to have minimum environmental impact.


3.2 Compressor Stations and Other Above-ground Facilities

Above-ground facilities will include two compressor stations, block valve stations and the pipeline receiving terminal in Italy. Two compressor stations, one near Kipoi, in Greece, and the other on the Albanian coast near Fier, will be used to ensure gas transportation through the pipeline. For upgrading to 20bcma in the future, it would be necessary to construct two new compressor stations at Bilisht, Albania and Serres, Greece. Block valve stations will be placed 30km apart on the pipeline for blocking gas flow during routine maintenance or in an emergency.

3.3 Offshore Pipeline and Landfall Construction

TAP will traverse the Adriatic Sea at the shortest crossing, between Fier in Albania and Italy's southern Puglia region, a distance of 105km. The choice of route reflects strict environmental protection requirements and the specific nature of the Adriatic seabed.

Pipes 12 metres long will be welded to the pipeline string on the deck of specialist S-type lay barges. The steel outer pipe will have a diameter of 36 inches and a thickness of 20 to 34mm, depending on the depth of water. At depths of less than 300m, the pipe will be coated with concrete for protection from potential damage. The deepest point of the pipeline below sea level will be 820m in the Strait of Otranto.

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4. Integration and Alignment of Social Functions


4.1 Corporate-level Social Management Integration

TAP social management organisation is shown in Figure 2 and Figure 3 below. Overall responsibility for TAP social impacts management rests with the Commercial and External Affairs Director, as head of the TAP Corporate Assurance Team. The Assurance Team ensures the integration of the project's environmental and social management organisation (Figure 2) at corporate level and, through the various country offices, the integration of stakeholder relations, government affairs and social investment functions (Figure 3).

4.1.1 ESCH Management


Within the Corporate Assurance Team, the key roles and responsibilities are:

- TAP Environmental and Social Manager, responsible for:
 - Review of the project ESCH management system on a regular basis or after any significant change to the project
 - Managing ESCH resources across the TAP project for the implementation of the project ESCH management system
 - Implementation of the E&S compliance and assurance programme and for communicating any changes to project ESCH standards to the in-country teams
 - Supply and management of technical support from third-party specialists, as required, to assist implementation of this plan
 - Functional support to the in-country ESCH teams
 - Sharing monitoring/audit findings and lessons learned between in-country ESCH managers and ESCH experts.
- Environmental, Social, Cultural Heritage (ESCH) and Grievance Advisors, whose responsibilities include:
 - Providing functional support to the in-country ESCH teams
 - Supplying and managing technical support from third-party specialists, as required, to assist ESCH implementation, effective planning, and the timely implementation of appropriate measures
 - Sharing monitoring/audit findings and lessons learned between in-country ESCH managers and experts.


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The key in-country social management roles are:

- In-country Project Manager (Integrated Project Management Team), responsible for:
 - Implementation and resourcing of agreed social impact management programmes at country level
 - Notifying Contractors of any amendments to the Compliance Monitoring Contractor Control Plan (CCP) or other social management requirements
 - Communicating the project's compliance monitoring commitments and requirements to Contractors.
- In-country E&S Manager, responsible for:
 - Communicating social impact management programmes and planning to the in-country ESCH team and Contractor and ensuring that they meet their responsibilities.
 - Management of the resources provided for the implementation of social impacts management at country level, as related to the in-country TAP ESCH function.
 - Managing the review and acceptance of Contractor Environmental and Social Implementation Plans (ESIPs), and associated sub-plans, and monitoring their implementation.
 - Managing effective Contractor oversight across all project activities.
 - Ensuring that all ESCH-related incidents are reported and dealt with effectively and that lessons learned are shared in accordance with TAP incident reporting procedure.
 - Managing in-country resources to react promptly to ESCH-related incidents arising from project activities when required.
- TAP senior site representatives' responsibilities include:
 - Implementation of social impact management plans at site level (pipeline, compressor stations, etc.), as related to TAP IPMT, and providing the resources to do so
 - Providing resources to react promptly to ESCH-related incidents arising from project activities
 - Supporting the Environmental, Social and Cultural Heritage (ESCH) Field Monitors to discharge their duties in relation to social impacts management.
- In-country Environmental, Social, Cultural Heritage experts' responsibilities include:
 - Review and approval of Contractor ESIPs and associated sub-plans
 - Oversight and monitoring of the Contractor ESIPs' implementation and Contractor performance of social impacts management
 - Support ESCH site leads and field staff through the provision of technical advice, training, audits and planning, including assistance with pre-construction surveys, document review, incident investigation and technical advice

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- Organising and participating in in-country inspections, reviews and audits of Contractor performance against the requirements of the E&S Compliance Assurance Plan
- Reporting on Contractor ESCH compliance and implementation of corrective actions to the in-country E&S Manager, as required
- Liaising with Contractor E&S Managers on compliance monitoring of corrective actions for implementation issues.
- Environmental and social site leads, who are responsible for:
 - Acting as interface between TAP and Contractor
 - Managing on-site activity by the ESCH staff and the day-to-day ESCH issues
 - Responsible for oversight of on-site ESCH monitoring, inspections, meetings and compliance reporting.
- Environmental, Social, Cultural Heritage field monitors are responsible for:
 - Oversight of implementation by Contractor of ESIPs, associated sub-plans and the requirements of this plan
 - Undertaking daily assurance monitoring and inspections
 - Providing feedback on inspections findings to the in-country Environmental, Social, Cultural Heritage experts and the in-country E&S Manager
 - Reporting non-conformances in daily reports to the in-country Environmental, Social, Cultural Heritage experts and communicating these and required action to address them to Contractor
 - Recording environmental, social, cultural heritage incidents and following up formal reporting by Contractor
 - Participating in internal (i.e. assuring TAP compliance) and external (i.e. assuring Contractor compliance) audits.
- Grievance Coordinator responsibilities include:
 - Receiving all incoming grievances and concerns through the Grievance Mechanism contact channels (email, fax, phone and SMS)
 - Ensuring TAP has a full and complete grievance record and supporting evidence trail for all received grievances and concerns
 - Ensuring that relevant workstreams conduct a full investigation of submitted grievances and provide relevant remediation/closure actions
 - Ensuring continued engagement with grievance stakeholders during the grievance process and acceptance of remediation measures
 - Managing the in-country grievance database module and providing training to TAP employees (country & project) on using the grievance database

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- Consulting with Contractor grievance teams on management of the construction grievance process through regular verification, monitoring and guidance in the implementation of the Contractor grievance process
- Consultation and information exchange regarding the grievance mechanism and its interfaces with land management and stakeholder engagement
- Providing advice regarding critical grievance management issues that may require escalation to the Grievance Advisor in TAP headquarters and the TAP E&S Manager
- Grievance monitoring and reporting according to defined KPIs
- Conducting regular lessons-learned sessions with other grievance advisors from other operating countries.

Figure 2 ESCH Management Organisation

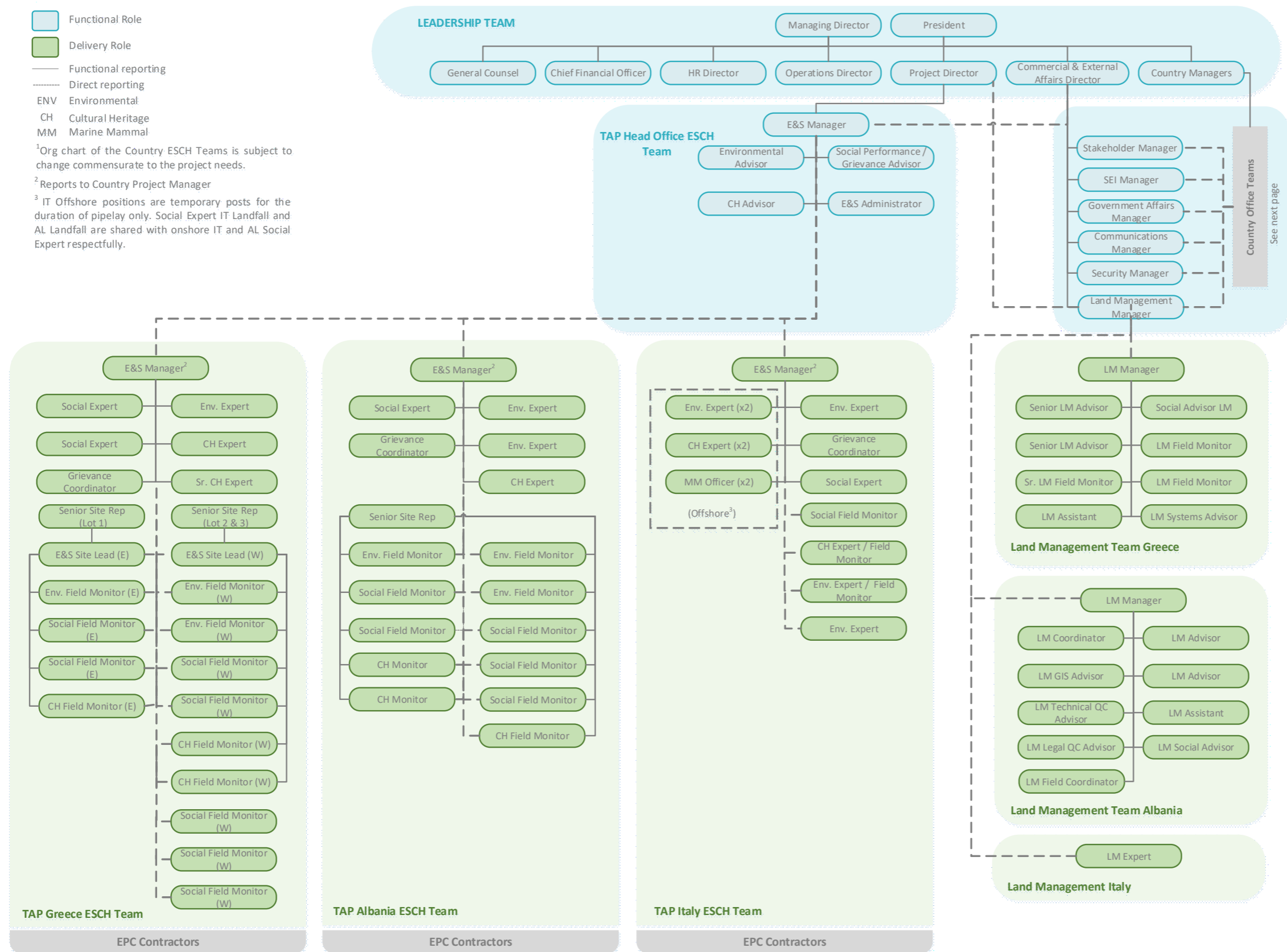
Legend:

- Functional Role
- Delivery Role
- Functional reporting
- Direct reporting
- ENV Environmental
- CH Cultural Heritage
- MM Marine Mammal

¹Org chart of the Country ESCH Teams is subject to change commensurate to the project needs.

²Reports to Country Project Manager

³ IT Offshore positions are temporary posts for the duration of pipelay only. Social Expert IT Landfall and AL Landfall are shared with onshore IT and AL Social Expert respectfully.




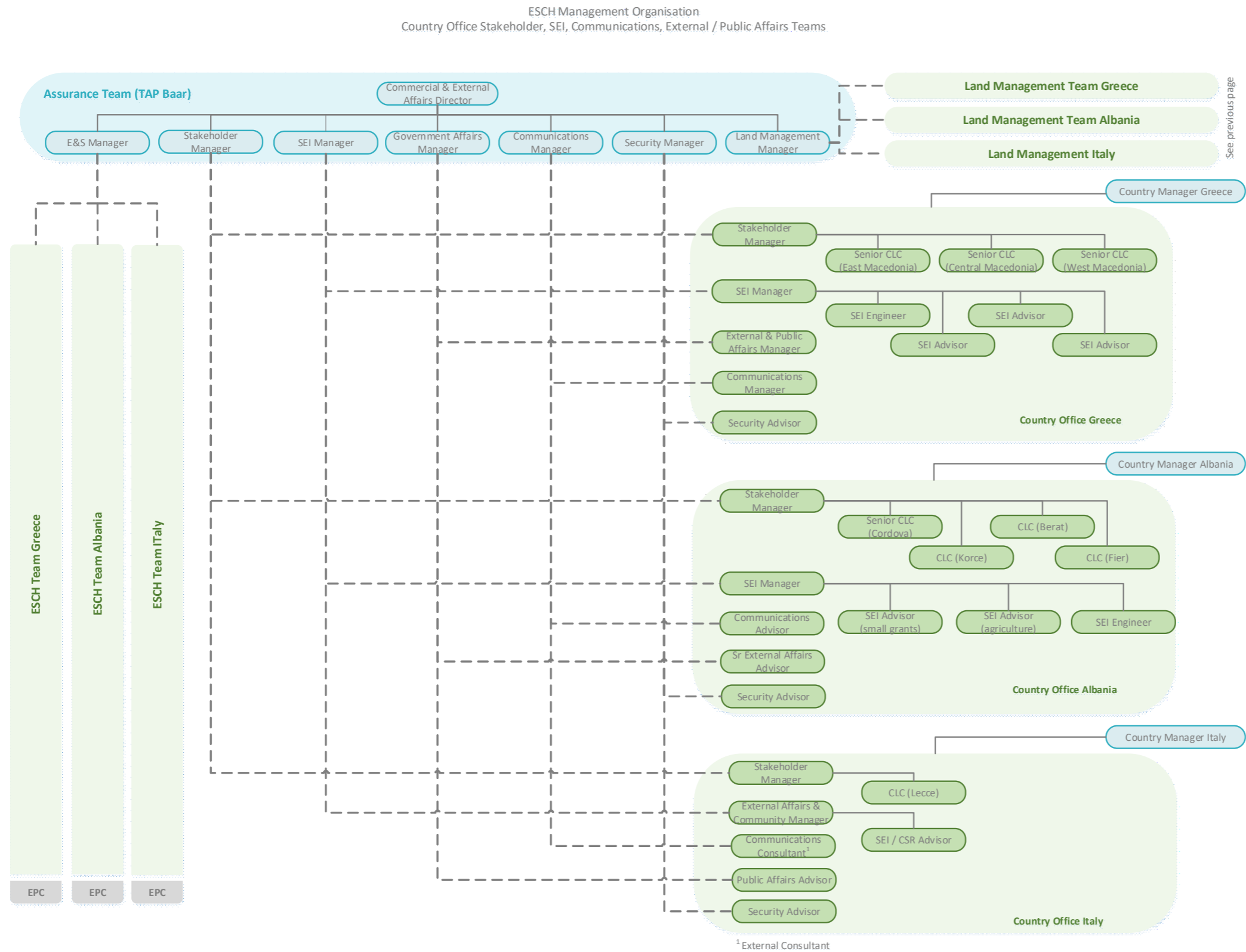

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Figure 3 ESCH Management Organisation (stakeholder management)




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4.1.2 Stakeholder Engagement Management

Stakeholder engagement functions are represented in the Corporate Assurance Team by the corporate staff responsible for coordination of stakeholder management, social investment, government affairs and communications across the TAP project.

The Country Offices (COs) are responsible for in-country stakeholder engagement. Key in-country roles are:

- Country Manager, responsible for:
 - Overall oversight, approval, and engagement with stakeholders at the national level, as necessary
 - Relations with international stakeholders.
- Stakeholder Manager, whose responsibilities include:
 - Overall management, monitoring, and engagement with stakeholders at the national and regional level, as necessary
 - Including stakeholder issues as part of regular management team meetings
 - Providing project information and schedules for discussion with stakeholders
 - Ensuring that engagement with TAP stakeholders in regional government, business and local communities is coherent and that issues and risks are identified and managed
 - Implementing TAP's stakeholder engagement plans
 - Supporting the SEI function on delivery of SEI programmes
 - Developing and gaining internal approval for timely and appropriate stakeholder communication
 - Verifying the quality of the CO stakeholder database
 - Coordinating closely with the TAP Grievance Management function
 - Managing the CLCs and ensuring the CLCs receive appropriate training
 - Actively participating in stakeholder engagements as 'TAP's person on the ground'
 - Co-operating and coordinating between CO and the IPMT Office on stakeholder engagement.
- External and Government Affairs Manager, responsible for:
 - Communications with media, government and external requests
 - Support to Stakeholder Management.
- Communications Manager whose responsibilities include:
 - Control of all country-level project documents and communications materials

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- Update the project website regularly in line with the construction schedule, post regular project updates and provide links to all available project materials.
- Community Liaison Coordinators, whose responsibilities include:
 - Providing project information and schedules for discussion with stakeholders
 - Ensuring engagement with TAP stakeholders in regional government, business and local communities is coherent and that issues and risks are identified and managed
 - Implementing TAP's stakeholder engagement plans
 - Supporting the SEI function on delivery of SEI programmes.
- Country ESCH teams and EPCs responsible for construction-related community-level engagement
- Country Land Management teams responsible for community-level engagement on land access and compensation matters


4.1.3 Monthly Assurance and Stakeholder Management Team Meetings

The Assurance and Stakeholder Management teams in TAP headquarters conduct monthly cross-functional meetings to review project social performance and agree strategic responses to emerging social issues, identified areas of underperformance or changes in the project's social or stakeholder environments. The monthly cross-functional meetings ensure effective integration between the TAP E&S Manager and other social-related functions such as Stakeholder Engagement, SEI, Security, Communications and Land Managers. There is a similar arrangement at country level to provide coordination between the Integrated Project Management Team (IPMT) and the Country Office Stakeholder Manager, CLCs and SEI Manager functions.

The monthly Assurance and Stakeholder Management Team meetings strengthen cross-functional integration and ensure a coordinated response to social and stakeholder issues. The monthly cross-functional meetings are based on country-level reports coordinated by the ESCH teams with input from Land Management, Country Offices, Contractors and others.

The agenda of the monthly cross-functional meetings includes but is not limited to:

- Ongoing assessment of project and Contractor social impact and stakeholder management capacities and resources in light of changing conditions and project demands
- Assessment of existing social impact and stakeholder management reports to improve their reliability and accuracy to measure project and Contractor management performance
- Consideration of the adequacy of cross-functional coordination and communications at country-level
- Identification of emerging risks to project and Contractor social impact and stakeholder management performance, based on analysis of trends in external social and stakeholder environment, changing project demands, assessment of grievance management trends, assurance reports and other available project data
- Ensuring project and Contractor social risk assessment and risk management plans reflect the nature and severity of emerging risks

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- Planning of activities and focus for the following month
- Development of specific country and local-level improvement plans, where appropriate.

4.2 Country-level Integration of Social Management Functions

4.2.1 Construction Management


At the country-level, construction social impacts management is coordinated through the ESCH teams, which are responsible for Contractor social and environmental performance. The ESCH team is in permanent contact with the TAP E&S Manager, ESCH and Grievance Management advisors to ensure ongoing coordination on ESCH management aspects as needed.

Weekly coordination involves a series of activities including:

- Weekly coordination calls attended by corporate advisors and in-country experts
- Weekly in-country ESCH planning meetings
- Participation in in-country IPMT meetings and meetings with Contractor ESCH teams
- Weekly coordination calls held as needed by each ESCH practice (environmental, social, cultural heritage, grievance management) with the participation of the respective corporate ESCH and Grievance Management advisors and in-country experts.

ESCH team planning meetings are held on a weekly basis by the in-country ESCH teams. The weekly meetings are led by the in-country E&S Manager with participation of the ESCH and Grievance Management advisors. The weekly planning meetings comprise of:

- Review of previous week's activities and targets (planned vs. actual) including identified non-conformances requiring discussion in IPMT meeting and recording in the TAP Non-conformance Reporting (NCR) system
- Planning of activities and focus for the following week. Definition of weekly inspections-focused checklists to be used and determination of locations subject to weekly inspections
- Set targets for the following week
- Identify and flag any needed resources and support by corporate ESCH team.

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Coordination meetings between the in-country ESCH team (in-country E&S Manager and ESCH experts) and Contractor E&S Managers and relevant ESCH staff occur on a weekly basis at the Contractor facilities. These weekly coordination meetings include review of previous week's activities and E&S assurance process outcomes (daily monitoring/weekly inspections results) and planning of the following week's activities, based on the construction works schedule. These meetings also include a review of the Route Environmental Impact Register (REIR) and Route Social Impact Register (RSIR) and of the Contractor pre-construction surveys to allow inclusion of any new sensitivities identified in the REIR and RSIR.

4.2.2 Route Social Impact Management


In addition, the Social Experts are responsible for maintaining the Route Social Impact Register, ensuring cross-functional co-operation in the assessment and management of critical social impacts between:

- ESCH
- Land Management
- Contractor ESCH teams
- Construction management.

Each function has identified 'champions' to feed in information on changing on-site social conditions. Field assessments will require additional Social Field Monitors and staff from LEA. The field assessments provide an opportunity for on-the-job capacity building in livelihood issues and identification of social impacts. Use of existing Social Field Monitors and LEA staff maximises the knowledge gathered by the project of individual cases and relationships with PAPs.

The Route Social Impact Register is a living document, updated on a weekly basis. Weekly working groups are convened to review the RSIR, update information, and agree actions as necessary. The RSIR identifies high priority 'red flag' cases, as well as all other identified social features, including but not limited to:

- Areas of high-productivity land or high-value crops
- Animal husbandry
- Grazing/beekeeping
- Businesses
- Irrigation systems and other types of infrastructure/utilities
- Crossings of heavily used roads
- Highly populated areas
- Secondary access to land (e.g. for agricultural purposes or access to houses)
- Educational facilities (primary, secondary, tertiary) and medical facilities
- Recreational areas
- Cemeteries, churches and other religious facilities (e.g. monasteries).

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In addition to known site-specific risks/issues, the RSIR ensures that all required site-specific Contractor deliverables are identified for each section of the RoW. TAP Social Experts, in consultation with other project social management functions, review Contractor Control Plans and Contractor Environmental and Social Implementation Plans to identify any required sub-plans that relate to the sections as a whole or individual features. These may include but are not limited to:

- Contractor Pre-Construction Survey (PCS) plans
- Contractor PCS and report
- Traffic management plans
- Stakeholder engagement plans and stakeholder engagement action plans
- Land entry/exit protocols
- Accommodation plan
- Worksite management plans
- Retrenchment plans
- Any other site-specific plan identified during pipeline section screening.

On a monthly basis, the TAP E&S Manager leads a review of the previous month's E&S assurance process, including a verification of RSIR implementation. The review is performed on a country-by-country basis through conference calls with each in-country E&S Manager and ESCH experts.


4.2.3 Compliance Assurance

The TAP social compliance assurance process (described in detail in Section 8) provides a further important focus for integration and alignment among the project's social-facing functions. The compliance assurance process requires intensive co-operation between TAP social and stakeholder management teams in TAP headquarters and at country level, and with allied functions such as Construction Management, Security and H&S teams, in the scoping, implementation and reporting of:

- Contractor inspections
- Audits against CCP and ESIP performance requirements
- Non-compliance reporting
- Action tracking
- Identification and close-out of corrective actions.

Within this, the project's social, lands and stakeholder management are responsible for:

- Ensuring Contractor compliance with project ESCH requirements as specified in the project ESCH management system
- Overseeing all company ESCH inspection activities
- Making periodic field visits to monitor and support inspection activities and managing the compliance assurance work of TAP supervisors and coordinators

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- Reporting audit findings to project senior management
- Issuing the annual audit schedule
- Compiling the internal and external audit protocols
- Leading internal and external audits as required.


TAP social experts, local lands personnel and ESCH Field Monitors are responsible for:

- Undertaking daily assurance monitoring and weekly inspections
- Providing feedback on daily inspections findings to the relevant TAP and Contractor managers
- Participating in internal (assuring TAP compliance) and external (assuring Contractor compliance) audits as required by project managers.

4.2.4 Stakeholder Engagement Coordination

The TAP Stakeholder Engagement Plan identifies the range of stakeholder engagement activities conducted at country level and the levels of shared responsibility and coordination among the project social management functions. Stakeholder engagement is performed by an Integrated Stakeholder Engagement Team comprising of staff from Stakeholder Management, Land Management (LM), ESCH, SEI, and Government Affairs functions, as well as by dedicated Contractor personnel. The in-country Integrated Stakeholder Engagement Team members are supported at TAP corporate level by the corporate functional leads, who provide guidance and ensure consistency of practice across the host countries.

TAP retains responsibility for the development of processes and procedures guiding stakeholder engagement and grievance management during the construction process. Engagement related to certain types of impact category is managed by Contractors. Where this is the case, commitments have been incorporated into Contractor Control Plans (CCPs) and implementation will be monitored on an ongoing basis. All engagement carried out by Contractors must comply with the systems and processes established by TAP for stakeholder engagement and grievance management.

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5. Identification of Project Impacts

As identified in the approved project Environmental and Social Impact Assessments (ESIAs), TAP will impact the existing socio-economic environment across the range of construction activities and operations, both positively and negatively. The most significant social impacts will be associated with the following areas:

- Land Access and Livelihoods
- Construction
- Employment and Local Content
- Cultural Heritage.

The nature of these impacts is discussed briefly below. Impact Management is discussed in detail in Section 6.

5.1 Land Access and Livelihoods


5.1.1 Land Easement and Acquisition

The project will require permanent land take for the above-ground installation, i.e. compressor stations, block valve stations and, in Albania, new and widened roads. This land take mainly affects agricultural land (mostly private) and forests (mostly public). TAP will acquire the land for the above-ground installations, and the present landowners will be compensated.

Pipeline construction will require temporary land take to enable exclusive access to the working strip, pipe yards, compressor stations and camps. Following completion of construction, reinstatement and planting along the pipeline route will be undertaken in accordance with a Site Reinstatement Plan. This will aim at restoring the environment to pre-construction conditions as far as possible. The pre-construction situation will be surveyed and recorded as a baseline for compensation. Reinstatement measures will be agreed with the landowners/users and the local administration. Erosion protection measures will be applied as required, land drainage will be reinstated, and affected irrigation systems and local roads and tracks repaired if damaged during construction.

The Construction Corridor will be occupied for a construction period of two years. Part of the construction corridor will also be further restricted for the duration of the pipeline operation.

TAP's Land Easement and Acquisition Strategy [TAP-HSE-ST-0002] addresses land-related issues and, particularly compensation entitlements and eligibility. Given the temporary nature of land access, the ownership of the land on the pipeline route will not change but the land will be subject to land easements, which restrict future land use by the landowners. These include a permanent Pipeline Protection Strip (PPS) eight metres wide, where no planting of trees or deep rooting permanent crops will be allowed. Agricultural works with annual crops can be carried out without problems after the pipeline has been laid, as the minimum cover of the pipeline will be not less than one metre. Fruit trees, etc. may be replanted in the working strip during reinstatement but the PPS will need to be kept free.

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Further, land use will also be restricted by the required safety zones. No construction of any buildings will be allowed within 20m distance of the pipeline and planned settlement development is restricted so as not to be within 200m of the pipeline. Due to the mainly linear and mostly still uncontrolled settlement development, there are restrictions in several places along the route which will require further coordination with municipalities. In practice, it means ensuring that municipalities are aware of the pipeline route and safety restrictions for construction, and that this is incorporated in development plans that can effectively guide future zoning and development.

5.1.2 Livelihood impacts

The land required by the project generally represents a relatively small proportion of affected landowners/users' land holdings. The agriculture structure of the regions traversed by the pipeline route, however, consists primarily of smallholdings which are of significance for household incomes and subsistence. In addition, change in agricultural production during the construction period may generate indirect impacts to regional businesses and agricultural employment, while road and infrastructure closures during construction may also impact local businesses and livelihoods. TAP will ensure the restoration of all impacted livelihoods to at least the levels existing prior to the project.

The Livelihood Restoration Framework (LRF) [TAP-LEA-PL-0001 for Greece, TAP-LEA-PL-0003 for Albania, TAP-LEA-PL-0004 for Italy] sets out project livelihood restoration strategies, mitigation measures, and entitlements for affected persons. Entitlements are defined in accordance with EBRD's Performance Requirement 5. The LRF is described in detail in Section 6.

5.2 Construction impacts


The project construction process will generate a range of potential social impacts, related primarily to community cohesion, disturbance of amenity, community health, safety and security and access to services and infrastructure.

5.2.1 Community cohesion

The presence of the project construction crews and operations represents a significant factor in the socio-economic environment and may impact community cohesion. In particular, the introduction of directly-employed non-local and foreign workers, and the unmanaged movement of people to project locations in the hope of finding work with the project or gaining benefit from indirect economic opportunities such as selling goods or services to the project or its workforce, may create tensions with local communities, place additional pressure on limited local services and infrastructure, and could result in other effects such as inflation, changing social relationships and changes to behavioural norms.

The project may create or exacerbate tensions within communities where, for example, there is a perception that the project is being co-opted by government authorities for political ends; where there is – or is perceived to be – an inequitable distribution of benefits or of negative impacts; where the project impacts on services, infrastructure and other community resources; or through the simple stress of change and of interacting within the community and with the project. Vulnerable groups within the study area may be excluded from decision-making and information-sharing processes.

There is a high degree of expectation among project-affected communities that the TAP project will bring local, as well as national level benefits. The expectation of project-related benefits has been

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raised consistently in stakeholder consultations and interactions. The main expected benefits include employment, access to gas, and improvements to other infrastructure. There is a strong likelihood of unmet expectations in the local communities which could result in a reduction in local acceptance of the project as it moves through the construction phase into operations.

5.2.2 Community disturbance


Project construction may locally lead to nuisance from dust generated from construction traffic. Standard mitigation measures such as dust suppression by water spraying will be applied where dust generating activities like earthworks or transport on unpaved roads take place in the immediate vicinity of settlements. The increase in dust is predicted to have a minor negative impact following mitigation but may still result in some increased annoyance and decreased well-being especially for residences close to construction sites.

Construction noise has emerged as a key issue outside the RoW, particularly where it may impact on the productivity of farm animals. Noise impacts generally will be assessed through noise dispersion modelling and may be mitigated by scheduling noisy construction activities to the least noise-sensitive times of the day and the use of low-nuisance vehicles and equipment. The specific noise concerns related to livestock will be subject to veterinary assessments, and TAP will establish appropriate impact mitigation or compensation measures where construction noise is assessed to impact on the welfare or productivity of livestock.

Similarly, project construction may entail some temporary, localised, heavy ground works that will generate vibrations, especially in the case of piling or blasting and hammering. Depending on the soil characteristics and on the distance to the nearest settlement, these activities could produce critical vibrations for houses in the vicinity, especially if comprised of wood beam floors and ceilings. Impacts could range from the level of temporary nuisance and disturbance, to actual damage to buildings, such as cracks in walls. It is unlikely that vibration will be a major impact factor in general, since the route and the compressor station site(s) are at a distance from settlements. However, due to the linear settlement pattern in the region (spreading mainly along the roads), individual houses in the more densely settled areas on the route could be affected. Construction mitigations in these circumstances include ensuring that all equipment is not running simultaneously, or for long periods, and that structural surveys are undertaken in advance of works to monitor any unforeseen impacts.

5.2.3 Community health, safety and security

The project could affect the health and safety and security of communities along the pipeline route and close to compressor stations as a result of worker-community interactions, the risk of injury associated with construction activities, and competition for access to healthcare resources. Any community concerns or perceptions regarding reduced health and physical safety may also be considered as impacts.

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The primary impacts to community health, safety and security include:


- The presence of an external workforce living in open camps where interaction with nearby communities is possible could lead to the increased transmission of communicable diseases within these communities.
- The influx of construction workers and opportunistic migrants to project areas may result in conflicts with local communities, particularly given likely competition for employment and services.
- The presence of an external workforce along the pipeline route is likely to lead to increased pressure on the existing healthcare facilities in the broader study area and potentially decreased access for local communities.
- Site trespass or unauthorised entry to worksites could result in accidents leading to injuries or even fatalities. The presence of large pieces of machinery and open trenches would be a particular risk if they were to become partly filled with water. Young people and children are most likely to trespass onto sites and are most at risk of injury.
- Communities may face significantly elevated road-safety risks as a result of the presence of construction vehicles, heavy plant, transportation of materials and goods to pipe yards and worksites and of workers to camps and villages and housing units in the vicinity. Project transport may additionally result in delays for local road users, road-surface degradation and increased levels of noise, dust and air pollution from increased traffic movements.

5.2.4 Access to infrastructure and services

The project will impact on utilities and infrastructure, particularly roads, during pipeline construction and pre-commissioning, due to activities such as construction and upgrade of the access roads, trenching and laying of the pipeline across roads, and other infrastructure such as irrigation and flood prevention channels. The main potential impacts on local infrastructure and utilities due to these project activities are disruption to traffic and transportation due to road crossings, pressure on existing local utility supplies and short-term planned and unplanned disruption to drinking water or electricity, and damage to local infrastructure. Disruption to infrastructure and utilities could result in impacts to livelihood, health and education services provision or quality of life and, if unmanaged, result in health impacts (e.g. water restrictions or inability to pass roads in an emergency). Such impacts would be disproportionately experienced by people or households who are vulnerable due to age, chronic illness or poverty. If unmitigated, disruption to services might result in community distrust and resentment towards the project.

5.2.5 Ecosystem services

TAP has reviewed project impacts on ecosystem services and identified mitigation measures required to meet project standards. Priority ecosystem services include those on which the project is most likely to impact and which, therefore, may result in adverse impacts to affected communities. Ecosystem service impacts associated with the project may include permanent and temporary loss of agricultural land, permanent crops and pasture, impacts to freshwater resources through modification of watercourse morphology, sediment plumes, freshwater consumption and accidental pollution of freshwater resources, and the extraction, transportation and management of aggregates.


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TAP also recognises that water regulation, through slower flows and reduced flooding, could affect vegetation, forests, irrigation channels, rivers and wetlands. Similarly, soil erosion and compacting associated with the removal of vegetation and trenching may result in loss of soils and their functions in some areas.

Mitigation and monitoring of ecosystem service impacts is described in a number of management plans, including the Livelihoods Assistance and Transitional Support and Livelihoods Restoration Plans, Water Management Plans, Aggregate Management Plans, Water Crossing Management Plans, Site Reinstatement Plans, and the Erosion and Sediments Control Plan.

5.3 Vulnerability

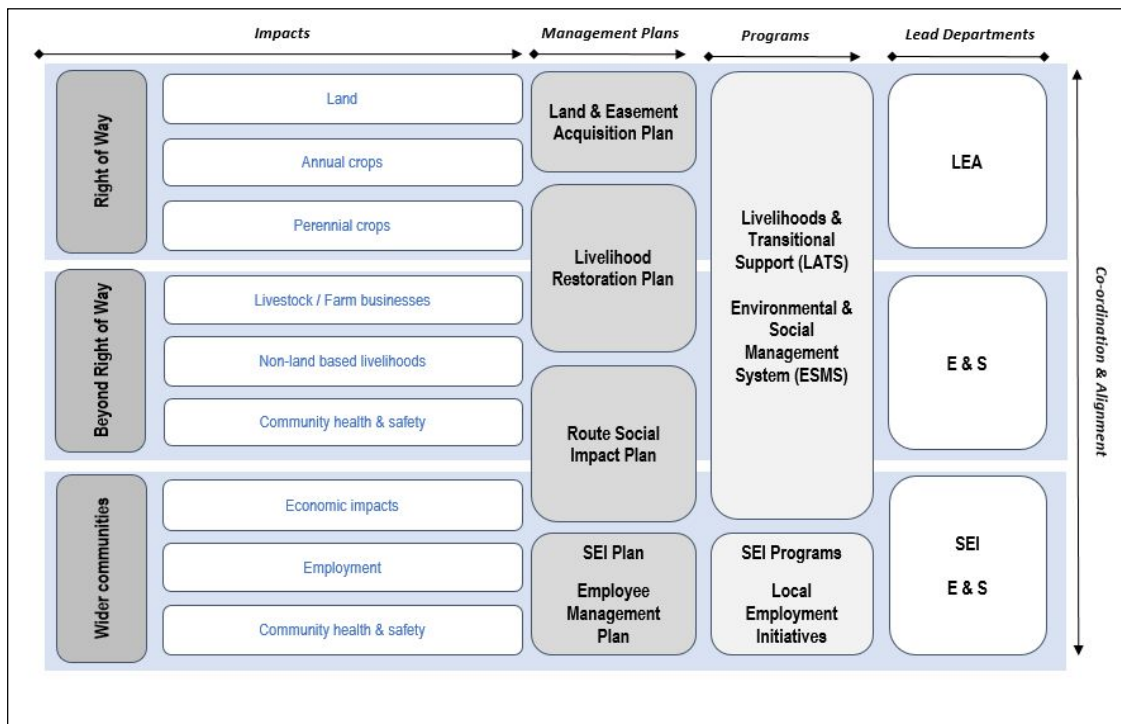
The project will pay particular attention to the needs of vulnerable persons across all areas of project construction and operations. Vulnerable persons may be defined as those people who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status, may be more adversely affected by land acquisition than others, and who may be limited in their ability to claim or take advantage of LEA assistance and project-related development benefits. EBRD Performance Requirements require specifically that attention be paid to the needs of the poor and vulnerable in land acquisition planning. TAP will identify individuals and groups whose welfare may be differentially or disproportionately diminished by the project because of their disadvantaged or vulnerable status and, where such groups are identified, propose and implement measures to mitigate adverse impacts on these groups.

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6. Impact Management


In compliance with EBRD performance requirements and national permitting regulations, thorough Environmental and Social Impact Assessments (ESIAs) have been undertaken throughout the TAP pipeline route. Full ESIA were submitted in Italy (March 2012, updated and resubmitted in September 2013, additional documentation integrated April 2014), Albania (January 2013, approved in April), and Greece (June 2013). The ESIA map all possible environmental, cultural and socio-economic impacts of the pipeline and include measures to avoid and mitigate them during and after construction and during operations. The ESIA also require transparent and open dialogue with all stakeholders in the project. TAP recognises that the socio-economic impacts identified through the ESIA process may be positive or negative, and may be experienced differentially by different groups and individuals depending on their capacity to adapt to change and to respond to opportunities presented by change in the social environment.

Figure 4 Social impact management framework



The project determines the potential for social impacts through thorough assessment of all sites and operations, analysis of baseline information, field visits, and the use of additional surveys and expertise where required. Where impacts are identified, impact management plans and supporting, cross-cutting mitigation strategies are established to ensure effective management of impacts throughout the life of the project. Agreements on required mitigation measures are documented clearly and witnessed by third parties as appropriate.

The primary sources of project social impact and the associated management framework are shown in Figure 4 above. This is discussed in the following sections.

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6.1 Land and Easement Access

TAP provides compensation to legitimate owners and users/tenants, identified at the time of the census and asset verification survey, of land required by the project on a permanent, temporary and/or restricted use basis. The project endeavours to reach agreement with affected landowners and land users wherever possible. Only where no agreement is reached with affected landowners will TAP resort to forced easement or acquisition, according to the processes described in national legislation.

Landowners will be compensated for losses and damages incurred during construction. This will include loss of structures (e.g. greenhouses and irrigation equipment), loss of permanent crops (e.g. apple trees), loss of harvest, and damage to buildings. Compensation is further considered to cover restrictions that will affect lands due to pipeline integrity protection and public safety reasons (PPS and safety strip). Compensation for permanent and temporary land take will be undertaken according to national legislation and EBRD's PR5. The Land and Easement Acquisition Plan details how compensation will be communicated with private and public landowners and users and how agreements on land purchase and easement rights are made well in advance of construction commencing.

The guide to project land acquisition, including eligibility criteria and compensation standards, has been distributed to affected landowners and land users and posted on the TAP website. The principles of LEA compensation include the following:

- Compensation for land and crops based on full replacement value and paid in advance of construction. Full replacement value will include related transaction costs
- Land required on a permanent basis for above-ground installations will be purchased from its current owners. Impacts on land ownership and livelihoods will be compensated
- Land required on a temporary basis will be leased from its owners and handed back after construction and reinstatement are completed. Temporary use of land will be compensated through land-rental agreements
- Owners of land that is subject to easement and/or restrictions during operations will be compensated
- Users of land that are affected due to the TAP project will be compensated for lost farm income (full replacement value) of any standing crops, and possible reinstatement costs that are impacted by project installations
- Orphan land, i.e. land that is severed or bisected by TAP, and the portion of the plot that is not directly impacted (acquired or rented by TAP) but rendered uneconomic, unviable, and/or inaccessible (either permanently or temporarily) will be compensated
- All affected people will have access to TAP's grievance mechanism
- Vulnerable people will be identified and, if required, will be provided with all necessary assistance in relation to Land Easement and Acquisition and Livelihood Restoration activities.
- Landowners will be entitled to a minimum compensation payment

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6.2 Livelihood Restoration Plan

The Livelihood Restoration Plan (LRP) [GAL00-PMT-660-X-TTA-0001 for Greece, AAL00-PMT-660-X-TTA-0001 for Albania, IAL00-PMT-660-X-TTA-0001 for Italy] describes the results of TAP's land easement and acquisition planning exercise and documents the commitments, procedures, and actions being taken to compensate the people, households and communities impacted by the project, consistent with national law and the EBRD Performance Requirement 5 - Land Acquisition, Involuntary Resettlement and Economic Displacement. The LRP details compensation entitlements and additional mitigation measures intended to address economic disruptions and/or displacement resulting from construction and operation of the pipeline.

6.2.1 Land access and livelihoods impacts

The LRP describes and quantifies land and livelihoods impacts identified through the project's inventories of affected land parcels, assets verification, and socio-economic census. The impacts are due to the permanent acquisition of land for above-ground installations, restrictions on land use during the operations phase of the project, and temporary exclusion from project construction corridors. The impacts will include:

- Permanent loss of some land
- Disruption of agricultural and other livelihood activities, and associated loss of income
- Loss of annual crops
- Loss of perennial crops/trees
- Loss of pasture land
- Loss of, or damage to, some on-ground structures
- Removal of some installations/improvements, including fences, buildings, irrigation equipment
- Potential for orphan land.


6.2.2 Impact mitigation measures

Impact mitigation will operate through:

- Compensation for impacts experienced through the land easement acquisition process
- Support for livelihoods restoration
- Support to vulnerable households

6.2.3 Livelihood restoration

The project recognises that compensation alone may not guarantee restoration or improvement of living standards. Complementary livelihoods assistance and transitional support measures will be delivered to ensure that all affected people, particularly those who may face exceptional or disproportionate challenge, can restore their livelihoods to pre-project levels.

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The Livelihoods Assistance and Transitional Support (LATS) programme aims to restore and, where possible, strengthen the livelihoods of project-affected households. To achieve this goal, five objectives have been defined:

1. Ensuring successful rehabilitation and reinstatement of temporarily leased land to affected owners and users for re-cultivation.
2. Monitoring of PAPs impacted by permanent land take, and support for efforts to secure suitable replacement land and re-establish livelihoods
3. Providing targeted livelihoods assistance, particularly to households and communities experiencing more severe land-access related impact
4. Ensuring linkages of project-affected people to the benefits and opportunities associated with the TAP project, including construction-related employment and training opportunities, and community investment initiatives
5. Providing appropriate transitional support to PAPs considered 'vulnerable' and at an elevated risk of hardship due to land easement and acquisition.

The Livelihood Assistance component of LATS will focus on four core areas:

1. Access to replacement agricultural land for both owners and users. This will apply to landowners who have lost access to all or a significant portion of their productive land due to TAP-required permanent land take. It will also apply to land users who may have lost access – temporarily or permanently – to land they were renting. The pipeline RoW generally runs through rural areas where agriculture is the predominant livelihood activity. The primary strategy for restoring livelihoods, therefore, is assisting PAPs in securing access to replacement agricultural land.
2. Improvements to current farming systems to assist PAPs who are impacted by permanent and/or temporary project-related land take and permanent planting restrictions. These may include improved use of fertiliser, improved seeds, higher value crops, hothouses, etc.
3. Support for job skills training and employment readiness initiatives, in anticipation of project construction-related opportunities. This strategy is expected to have limited impact due to the short overall construction window, and the even shorter period during which construction will occur in any one place along the more than 500km length of the pipeline RoW. But upgrading the skills of the PAPs will be of long-term benefit for them as far as unemployment is concerned.
4. To the extent possible, TAP will act as a conduit to link PAPs with ongoing assistance programmes. TAP has an intimate knowledge of the PAPs, many of whom were already living in precarious conditions due to advanced age and at, near, or below poverty income levels. TAP will try to ensure that these vulnerable PAPs benefit from any new or ongoing programmes that seek to provide physical/technical assistance, including re-establishing crops on their land once it has been reinstated.

LATS will be aligned with the project's Social and Environmental Investment (SEIP) programme to ensure that synergies are identified and captured. TAP is currently undertaking an inventory and assessment of the programmes, organisations and financial institutions providing relevant forms of livelihoods assistance and social support to people living in project-affected regions. Of particular

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interest to the development of LATS are those organisations operating in municipalities directly affected by the project and with particular expertise in the following areas:

- Vocational and job skills training, mentoring and apprenticeship programmes (including those targeted at women, youth and marginalised groups)
- Agricultural research and development, particularly as it relates to economically viable crops that are suitable for cultivation
- Micro-financing programmes, training and services for farmers/professionals
- Support for the elderly and differently abled.

6.2.4 Addressing vulnerability through the LATS programme

The overall goal of the transitional support component of the LATS programme is to identify, assess, and provide appropriate assistance and follow-up to project-affected persons deemed vulnerable, and experiencing transitional hardship due to project impacts. The three main components to the Transitional Support Programme are:

- Continuously monitor, identify, track, and follow up all displaced persons to ensure that they all have equal access to, and can benefit from, LEA activities and project interventions
- Design and implement LEA process interventions to ensure that the execution of LEA activities will minimise negative project-related impacts while being able to accommodate economically displaced households with pre-existing vulnerability
- Referral of vulnerable persons to specialised community health/social service providers within the project area who are best positioned to address pre-existing and/or project-induced vulnerability.

The transitional support programme has defined eligibility criteria, identifies persons who belong to specific vulnerable groups, and aids as necessary to ensure that all project-affected persons, especially those with pre-existing 'vulnerability', can cope with the land easement and acquisition process and benefit equally from the project. Households' vulnerability is defined by reference to:

- Exposure to risks/adverse impacts
- Sensitivity to risks/impacts
- Adaptive capacity.

LATS is finalising agreements with relevant partners to effectively deliver programmes.

The Transitional Support Programme process for addressing vulnerability is shown in Figure 5 below.


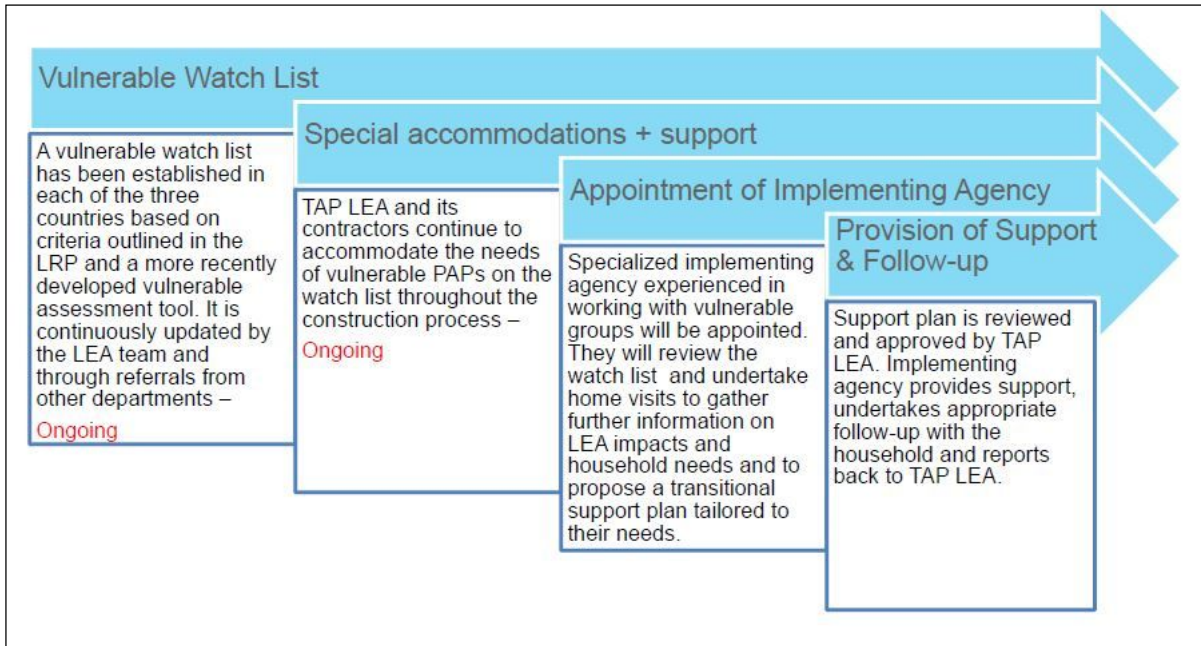
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Figure 5 Transitional (Vulnerability) Support Programme



6.3 Construction Impact Management


Social impact management of the construction phase is achieved through the implementation of:

- The TAP ESCH Management System (ESCH MS), Contractor ESMSs, and associated documents, including Contractor Control Plans (CCPs), Environmental and Social Implementation Plans (ESIPs), and related sub-plans
- The Route Social Impact Management process, which includes kilometre point by kilometre point social constraints and mitigation registers (RSIR) collating applicable site-specific social constraints and associated mitigation measures to provide further detail for ESCH implementation.

6.3.1 ESCH Management System

The TAP ESCH MS plays a critical role in ensuring that the commitments detailed in the project Environmental and Social Impact Assessments (ESIAs) are operationalised through effective management planning and resourcing of project and Contractor ESCH teams. The TAP ESCH MS is based on the requirements and commitments set forth in TAP policies, the TAP Code of Conduct, project standards, the ESIA, HRIA, and project permits. Interface documents (comprising of the Environmental and Social Commitments Registers and the ESMS Project Standards Document) assist in transposing these commitments and requirements into the ESCH MS and sit above this ESMP in the overall ESCH MS structure.

Within their respective management systems, both TAP and the Contractors have developed and implemented management programmes, procedures and work instructions to ensure that all applicable environmental and social responsibilities and commitments are complied with during project design and construction. Both TAP and the Contractors conduct frequent internal monitoring of their environmental and social management programmes, procedures and work instructions to

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ensure consistent and adequate performance. TAP additionally conducts compliance assurance to ensure the adequate environmental and social performance of the Contractors.


Processes applied by TAP to implement the ESCH MS and to manage Contractor environmental and social performance are further detailed in the TAP ESMP [CAL00-PMT-601-Y-TTM-0006]. Contractor environmental and social responsibilities are defined within the Contractor ESMS Framework Document and in the Contractor Control Plans (CCPs).

6.3.2 Social Management Documents

The social management documents, developed to support the implementation of project social commitments in each TAP host country, define TAP's approach to managing the project's social commitments during construction. They indicate project roles and responsibilities and provide the link to the corresponding CCPs and Contractor Environmental and Social Implementation Plans (ESIPs). The key social management documents and their objectives are described in Table 3 below.

Table 3 Social management plans and objectives

Social Management Documents	Objectives
Stakeholder Engagement Strategy	<p>Describes the overall scope of TAP stakeholder engagement during construction and commissioning phase.</p> <p>Describes roles and responsibilities for stakeholder engagement.</p> <p>Describes key stakeholder engagement activities across social-facing functions.</p>
Stakeholder Engagement Plans	<p>Outline the planned stakeholder engagement during the construction stage by country.</p> <p>Provide the framework for ongoing stakeholder identification, analysis, mapping, prioritisation, consultation and engagement.</p> <p>Define the roles, responsibilities and resources necessary at TAP host-country level to implement the stakeholder engagement plan, including the procedures to monitor and follow up on stakeholder feedback and grievances.</p>
Grievance Management Framework	<p>Details the scope, principles, responsibilities and processes associated with the TAP Grievance Mechanism.</p>
Grievance Management Plans	<p>Defines process of addressing, managing and resolving grievances, concerns, complaints and LEA requests raised by stakeholders related to construction activities.</p>
Industrial Relationship Management Plan	<p>Describes the processes, tools, supporting roles and responsibilities designed to ensure TAP's effective oversight of contractors' employee and industrial relations management. IRMP aims to ensure that project contractors manage employee and industrial relations responsibly and properly address potential risks to TAP's reputation and delivery.</p>
Livelihoods Restoration Framework	<p>Describe the nature and extent of the project's impacts and the eligibility and entitlements of affected persons or communities with respect to compensation</p> <p>Outline the specific procedures which will be used to determine and award compensation using methods which are transparent, consistent and equitable</p> <p>Outline the process for the development of appropriate livelihood supports and transitional assistance for project-affected persons (PAPS) and vulnerable PAPS in particular.</p>

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Social Management Documents	Objectives
Livelihoods Restoration Plans	<p>Define processes 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.</p> <p>Define process of assisting all persons displaced by TAP to improve, or at least restore their former livelihoods and living standards.</p>
Social & Environmental Investment Strategy	<p>Outlines TAP's approach to social and environmental investments (SEI).</p> <p>Details the criteria and process by which SEI projects will be determined, managed and monitored.</p>
Cultural Heritage Management Plans	<p>Define the mitigation measures implemented to ensure that negative impacts to onshore and offshore cultural heritage as a result of project activities are prevented or, where this is not possible, reduced to as low as reasonably practicable during the construction phase of the onshore and offshore sections of the project.</p>
Community Safety & Security Plans	<p>Health and safety risks to the community.</p> <p>Community notification management.</p> <p>Construction site management, including pollution prevention, resource availability, construction schedule.</p> <p>Traffic safety management, including road crossings and marine traffic (for Italy).</p> <p>Security.</p> <p>Worker–community interaction, including worker health screening, worker awareness, education and behaviour.</p> <p>Community grievances.</p>
Environmental & Social Compliance Assurance Plan	<p>Defines the measures necessary to ensure compliance assurance during the construction phase of the onshore and offshore sections of the project.</p> <p>Compliance monitoring standards.</p> <p>Social Compliance Monitoring (SCM) System.</p> <p>Compliance assurance methods.</p> <p>Management of non-compliances (action tracking system (ATS), reporting).</p>

6.3.3 Contractor Environmental and Social Management

TAP has developed sets of onshore and offshore CCPs to guide Contractor implementation of the ESIA commitments contained in the project Commitment Register [AAL00-PMT-601-Y-TLX-0001 for Albania, GAL00-PMT-601-Y-TLX-0001 for Greece, IAL00-PMT-601-Y-TLX-0001 for Italy]. The CCPs are part of the construction contracts.

The social management CCPs comprise of the following:

- Stakeholder Engagement and CSR CCP
- Additional Land Take CCP
- Community Health, Safety and Security CCP

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- Employment, Training and Workplace Management CCP
- Infrastructure and Utilities CCP

Contractor management of project social impacts during construction is ensured through the implementation of the Contractor ESMS, developed by the Contractors and based on Contractor ESMS Framework Documents [CAL00-RSK-601-Y-TTM-0001] and the CCPs. The Contractor ESMSs consist of the ESIPs through which they operationalise the CCPs. The ESIPs describe how the Contractor will implement the requirements outlined in the corresponding CCPs.

Contractors are required to ensure that all TAP project ESCH and CCP requirements relevant to its construction activities are included in the ESIPs, along with supporting sub-plans (management plans, method statements, etc.). The Contractor ESIPs and associated sub-plans include roles and responsibilities, a description of technical detail together with design, equipment and operating procedures to direct implementation of the requirements in the corresponding CCPs, monitoring objectives and specific details of monitoring and reporting to project management. The Contractor social ESIPs and associated sub-plans are described in Table 4.

Table 4 Contractor ESMS social documentation

ESMS Document	Sub-Plans
ESMS Manual	
Additional Land Take ESIP	Land Easement and Acquisition (Additional Land Take) Procedure. Site Environmental, Social, and Cultural Assessment (Additional Land Take) Procedure.
Community Health, Safety and Security ESIP	Traffic Management Plan. Action plan to prevent/minimise potential to vector-borne and other communicable diseases. Security Plan.
Infrastructure and Utilities ESIP	Flood Control and Irrigation Continuity Procedures. Public Utilities Assessment Plan. Existing Infrastructure Management Procedure. Crossing Plan and Schedule (including all known roads, irrigation channels, telephone and power cables, sewage infrastructure, HEP water pipes and oil/gas/water pipelines)
Procurement and Worker Management ESIP	Purchasing Strategy Employment Plan Local Recruitment Plan Code of Conduct Procedure for Auditing Programme for Contractors and Supply Chain Worker Management Plan OHS Management System and project H&S Plan Retrenchment Plan Training Plan

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ESMS Document	Sub-Plans
	Local Workforce and Supplier Training Plan Worksite Management Plan Worker Accommodation Plan Worker Grievance Mechanism Procedure
Cultural Heritage ESIP	
Stakeholder Engagement ESIP	Stakeholder Engagement Procedure Grievance Procedure Stakeholder Database Stakeholder Engagement Action Plans Minutes of Meetings
Compliance Monitoring ESIP	ESCH Site Inspection and Reporting Procedure

6.3.4 Route Social Impact Management

Route-level social impact management strategy is described in the Route Social Impact Plan (RSIP) [CAL00-PMT-601-Y-TTA-0001]. The RSIP augments the strategic systems and management planning set out in the ESCH MS and associated CCPs and ESIPs to provide effective and immediate on-ground response to unforeseen or residual social impacts encountered by TAP Land Management team and Contractors. The RSIP process is shown in Figure 6 below.

Figure 6 Route social impact management process



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The Route Social Impact Plan seeks proactively to:

- Identify all assets and businesses in proximity to the Right of Way potentially impacted by construction activities
- Assess all aspects of identified sites, including an assessment of risk, both to the asset/stakeholder, and to the project in terms of potential construction delays
- Prioritise 'red flag' cases for further assessment, engagement and mitigation as appropriate
- Develop appropriate assessment and mitigation plans as required, including site-specific communication plans
- Engage with potentially affected owners and users of identified assets, as appropriate, in order to take a proactive approach to managing impacts
- Manage the mitigation of identified impacts during construction and ensure the maintenance and/or restoration of affected livelihoods as applicable
- Monitor & evaluate the outcomes of implemented mitigation measures to ensure positive outcomes for affected stakeholders and the project.


The Route Social Impact Plan is based on a Route Social Impact Register established to identify potentially affected assets, gather information, prioritise these for assessment, develop appropriate mitigation measures, and assign roles and responsibilities. The RSIR has been developed by TAP to ensure that all sensitive sites and receptors and recommended mitigations are centralised in a single location that is available to TAP and its Contractors. The register format will be common across all countries and Contractors to ensure consistency in the social management approach.

6.3.4.1 Tier 1 Engagement Planning

The RSIP process is also designed to classify levels of local community sensitivity and to inform the development of Tier 1 Engagement Plans (TEPs). TEPs are established where there are particular social or stakeholder sensitivities in a project-affected location or clusters of households or businesses experiencing similar significant impacts (for example, businesses affected by construction activity or noise). Local sensitivities in Tier 1 communities require development of engagement plans that provide levels of engagement, resourcing and support in excess of those outlined in country SEPs. The scale and complexity of stakeholder issues in Tier 1 communities typically also require that TEP working group members and resources are drawn from across TAP's project management and stakeholder engagement functions, reflecting the need for integrated approaches to social issues management and stakeholder engagement. The TEP process is described in the TAP Stakeholder Engagement Plans (SEP).

6.3.4.2 Impact Identification

TAP country Social Field Monitors, working as part of the local ESCH teams, will be responsible for population and management of the RSIR, assisted by specialist consultants. The Register will be populated with identified assets impacted by the RoW, as well as all other identified assets, including but not limited to:

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- Areas of known project opposition
- Areas with land-related issues
- Areas of high productivity land or high value crops
- Grazing/beekeeping
- Business (particularly those susceptible to environmental changes/construction impacts)
- Areas known for tourism and operators in the area
- Irrigation systems and other types of infrastructure/utilities
- Crossings of heavily used roads
- Highly populated areas in the vicinity of the pipeline route
- Secondary access to land (e.g. for agricultural purposes or access to houses)
- Educational facilities (primary, secondary, tertiary) and medical facilities
- Recreational areas
- Cemeteries, churches and other religious facilities (e.g. monasteries) where access/ceremonies could be interrupted during construction.
- Communities with a high concentration of vulnerable groups.

6.3.4.3 Impact assessment


The Route Social Impact Register establishes a hierarchy of three levels. Each level reflects the potential risk associated with identified social impacts and the consequent levels of investigation, mitigation and management required:

1. Level 1: compilation of all sites on or proximate to RoW based on social baseline data. Potential 'red flags' identified using agreed criteria/triggers, and elevated to Level 2.
2. Level 2: a weekly working group is informed regarding Level 2 sites and these are then 'ground-truthed' through discreet site analysis (no engagement with owner/user). Sites with no impact remain on Level 2 list for monitoring. Sites with confirmed impact are elevated to Level 3.
3. Level 3: individual site files are developed for Level 3 sites to include descriptions, risk assessment, PAP engagement strategy, and further assessments required (e.g. veterinary). The site files also document the final mitigation plan developed, based on the outcome of engagements and technical assessments. Level 3 site files and associated mitigation plans are presented to the working group for approval.

6.3.4.4 Developing mitigation measures

Mitigation plans will include:

- Site summary
- Rapid assessment findings

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- Details of mitigations (e.g. construction-related mitigations, relocations)
- Communication plan and schedule
- Roles and responsibilities (for individual mitigations, communication, and overall management/oversight)
- Schedule for implementation
- Monitoring plan (including supervision of works, follow-up with PAP, follow-up surveys).

In developing appropriate measures to address impacts, preference will be given to non-monetary solutions and avoidance of cash compensation. The primary mitigation for impacts will include:

- Mitigation measures by the Contractor (e.g. fencing, reduced work hours)
- Operational and design changes (e.g. reduced working width)

Where impacts identified cannot be sufficiently addressed through construction management measures, two main mitigation measures may be considered:

- Livelihood supports and/or temporary relocation, or
- Compensation for temporary disturbance.


Where temporary relocation is considered, proposals for mitigation will consider the following:

- Identification of a suitable alternative site (ideally this will be identified by the affected owner/user, to ensure appropriateness and early identification and agreement)
- Cost of making good alternative site
- Cost of moves (including loss of earnings)
- Special measures during moves (e.g. attendance of veterinary expert)
- Pre-construction/baseline survey of all assets
- Confirmed timescale and duration of relocation
- Arrangements for return
- PAP/TAP and Contractor roles and responsibilities
- Signed agreements
- The basis for how residual issues (e.g. legacy damages) can ideally be addressed post-relocation.

Where compensation for temporary disturbance is considered, proposals will take into account the following:

- Linking of compensation to measurable disturbance
- Costing of all impacts (e.g. loss of earnings)

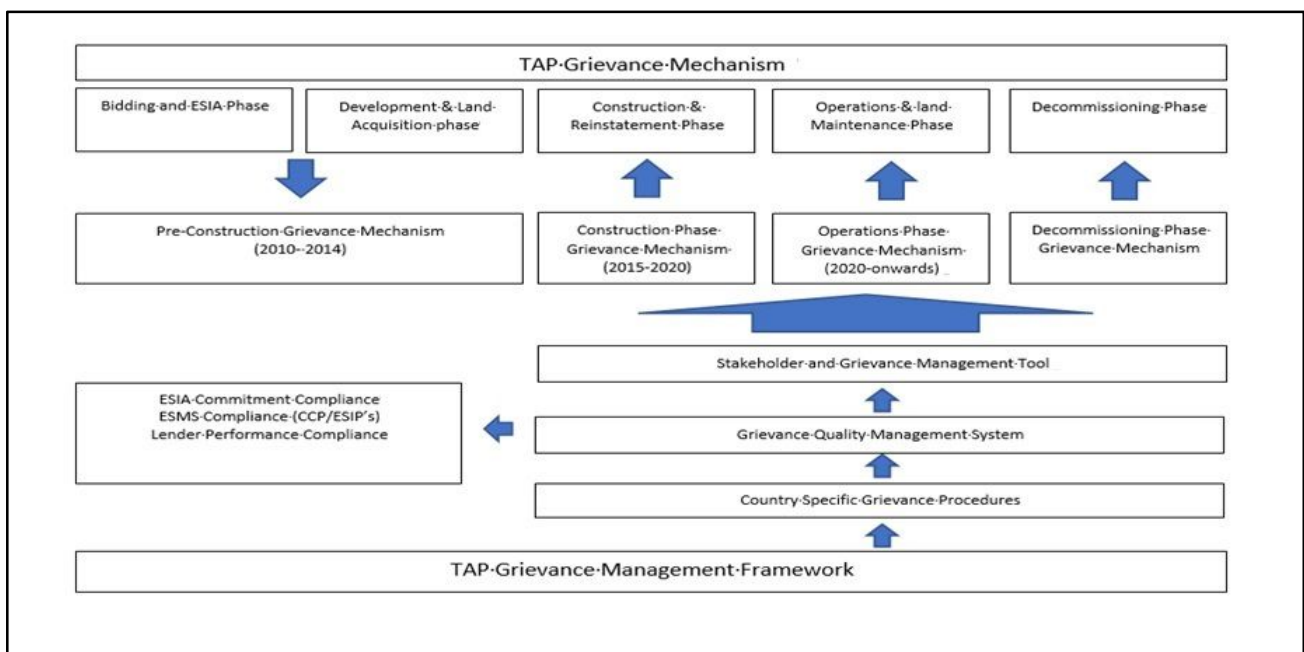
Any damage as a result of construction will be restored rather than compensated in cash.

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7. Grievance Management

TAP has established a third-party grievance mechanism which provides communities with a means of lodging complaints about any aspect of project activity and of seeking redress for adverse impacts. The grievance procedure aims to address, manage and resolve stakeholder grievances, concerns, complaints and requests related to TAP construction activities and to ensure that TAP is aware of and responds to stakeholder concerns.


Figure 7 TAP Grievance Mechanism



The grievance resolution process is incorporated in this Social Impact Management Plan to mitigate high-risk grievance cases and livelihoods impacts. This allows a clear understanding of TAP project risks that need to be managed.

The TAP Grievance Mechanism has been designed according to the TAP project phases: pre-Construction, Construction, Operations, and Decommissioning and is outlined in the TAP Grievance Management Framework (GMF). The GMF outlines the principles of grievance management and defines the organisational structure and processes required to implement a functional, effective and culturally appropriate grievance mechanism that is responsive to stakeholder needs. The procedure for managing grievances in each country is described in relevant in-country procedures. These procedures will be updated to incorporate lessons learned or to make efficiencies in the procedure. The procedures also outline the methods by which TAP receives grievances, such as email, letters, text, phone, in-person.

The grievance mechanism is communicated in a format and language readily understandable to the local population. To ensure that all stakeholders are aware of how to submit grievances, TAP has also created additional grievance communication materials such as posters and pamphlets as well

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as an engagement plan for the Grievance and Information Hotline. These are distributed at TAP regional offices and worker camps.

All grievance information is recorded in the Stakeholder and Grievance Management Tool (SGMT), which includes all grievance history as well as current grievances that arise during the construction phase.

7.1 Categorisation of grievances


To assist the Grievance Coordinators in correctly assessing and escalating grievances to the correct workstreams, the following grievance categories have been identified:

- **Technical and Design Assurance and Support:** these grievances will result from engineering design planning activities which have a potentially negative impact on stakeholders
- **Construction:** these grievances will result from pipeline construction activities including dust, noise, vibration and any damages caused during construction. In addition, the following sub-categories will be employed:
 - Nuisance (dust, noise, vibration, light pollution, wastewater, etc.)
 - Accidental damage
 - Access roads construction
 - Reinstatement
- **Land Easement and Acquisition (LEA) activities:** these grievances will result from LEA and securing land access (SLA) activities. In addition, the following sub-categories will be employed:
 - Land entry process
 - Compensation rate/methodology dispute
 - Compensation payment delay
 - Land exit process
 - Boundary marking or boundary dispute
 - Land titling and ownership disputes
- **Livelihood Restoration activities:** these grievances will result from a failure to deliver livelihood restoration activities or from a failure of TAP affected stakeholders to restore their livelihoods. In addition, the following sub-categories will be employed:
 - LATS program acceptance / qualification
 - LATS – Farm support
 - LATS – Business support
 - Vulnerable assistance
 - Construction impact on agricultural productivity or animal welfare
 - Other livelihood impacts

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- Legal and Compliance: Grievances with legal ramifications for TAP and those alleging breaches of TAP’s Code of Conduct, Anti-Bribery and Ethical behaviour commitments
- Social Conduct in the Communities: these grievances will result from unfavourable interactions between TAP or Contractor employees in the community environment
- Community safety and security:
 - Transport: these grievances will result from transport related activities
 - Accommodation: these grievances will result from activities taking place around the Contractor camps or Contractor accommodation
 - Pipeline: these grievances will result from safety concerns expressed by individuals and communities located near pipeline construction sites.
- Cultural Heritage: these grievances will result from the failure to protect cultural heritage areas
- HSSE Incidents: any event which leads to or has the potential to lead to injury, loss of life, damage to assets (including non-TAP assets) or to the environment. These incidents will be managed directly by TAP’s In-country HSSE Function
- Environment: these grievances will result from activities deemed detrimental to the local environment and biodiversity
- Employment: these grievances will result from unclear employment practices either by TAP or the Construction Contractors or alleged breaches in employment and Human Rights Practices. Employment grievances directed at TAP will be dealt with by the TAP Industrial Relations and Human Resources Department. The following sub-categories will apply:
 - Recruitment
 - Retrenchment
 - Welfare
 - General HR
 - Remuneration and working hours
- Stakeholder Engagement: these grievances will result from a lack of stakeholder consultation or a general lack of information for community stakeholders
- Corporate Social Responsibility¹: these grievances will result from the implementation of TAP’s CSR or Community Investment activities
- Multi-category grievances: these grievances will result in two or more categories and require several work streams to address them
- Extra-judicial letters: these are formal letters submitted to Company or Construction Contractor by complainant’s lawyers requesting immediate remediation actions before

¹ Questions or recommendations relating to strategic investment or TAP’s broader Corporate Social responsibility (CSR) activities will be managed directly by the Commercial Department.

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complainant decides to use other legal or judicial channels. Such letters can relate to any of the Project execution activities and fall into any of the above described categories and are normally dealt by Company's and or Construction Contractor's Legal functions.


If during the assessment process the Grievance Coordinator determines that a particular grievance fits into more than one grievance category, these additional assessment steps will be followed:

- Double-check the assessment with other Grievance Management team members
- Clearly identify the different categories involved and outline the reasons
- Register each grievance category as separate grievance (each with its own grievance number) but with the same PAPID Number
- Re-assess the severity and consequence of each grievance (separately)
- Follow the standard grievance resolution process.

7.2 Responsibilities

TAP is responsible for managing grievances and complaints resulting from its activities. During the project construction phase, the Contractors are responsible for managing third-party and worker grievances resulting from their construction activities. The Contractors are therefore expected to implement a robust and appropriate third-party and worker grievance mechanism.

TAP also expects the Contractors to liaise closely with TAP's grievance management teams to ensure a robust grievance management process across the TAP project. If any high-severity grievances arise related to Contractors, TAP will take the lead in the management and resolution of these grievances and the relevant Contractors will provide the required support. Additional information on this is provided in the TAP Grievance Management documents [AAL00-PMT-601-Y-TPG-0001 for Albania, GAL00-PMT-601-YTPG-0001 for Greece, IAL00-PMT-601-Y-TPG-0001 for Italy, Framework: CPL00-PMT-601-Y-TVO-0001].

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8. Compliance assurance, monitoring and reporting

8.1 Objectives

TAP's social compliance assurance programme generates the data required to determine whether project social impact management commitments are achieved, and all actions implemented to avoid or mitigate social impacts. The compliance assurance programme ensures TAP and EPC compliance with applicable legislation and project standards is attained during the construction and commissioning phase. The principal objectives of the monitoring and verification programme are to provide assurance that:

- Contractors and their sub-contractors are adhering to the requirements of applicable legislation and project standards
- Compliance monitoring of TAP and Contractors' activities is being managed in accordance with this E&S Compliance Assurance Plan (CAL00-PMT-601-Y-TTM-0005).

The compliance assurance programme provides a framework for ensuring that:

- All activities are inspected and audited in accordance with a risk-based routine schedule
- Audits are carried out on all Contractor ESMS documentation to ensure compliance with project commitments and project standards
- Actions are tracked and elevated as required
- Any non-conformance is recorded and actioned as required and elevated if it poses sufficient risk or remains unaddressed.


8.2 Assurance Programme

8.2.1 Quarterly Social Monitoring

TAP has developed a Social Monitoring and Evaluation Framework to ensure the effective monthly and quarterly monitoring and evaluation of activities. The framework enables the project to concisely review all key project social impacts and mitigation measures developed through the social management plans. It allows succinct and effective identification, monitoring and review of key impacts identified, and the various mitigation measures employed through the various management plans. At the same time, it also allows at-a-glance information related to key project components and departmental responsibilities and interests.

The framework identifies the key project components with social impacts as follows:

- Land access and compensation
- Livelihood restoration
- Vulnerable assistance and transitional support
- Local employment and procurement

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- Community investment
- Female participation and delivery of benefits to women
- Stakeholder engagement, including grievance management
- Community health, safety and security.

For each component, the key project impacts are identified through the various social management plans along with the various responsible departments and management staff. The framework identifies the key social management plans associated with each impact and the key mitigation measures that have been identified to address each impact.

In each case, the impacts are monitored throughout the project life-cycle, from input of resources at the outset, to measuring the final result or change resulting from the mitigation measures employed. Key indicators have been identified for each impact, addressing the following:

- Implementation
 - Inputs (resources)
 - Activities (effort)
 - Outputs (services/products)
- Results
 - Outcomes (effectiveness)
 - Impacts (changes)

For each indicator, the current status is summarised, together with identification of any key issues or gaps, and recommendations for further action identified as appropriate. The framework also notes key sources of information to be either consulted or gathered to effectively monitor and evaluate each component.


The framework is updated each quarter. The key findings arising from the framework are summarised as follows in quarterly reports:

- Status summary
- Gaps and emerging issues
- Conclusions and recommendations

8.2.2 Daily Oversight Monitoring

Daily assurance monitoring aims to verify the implementation of social, employment and cultural heritage impact mitigation measures and provide information on their effectiveness. It demonstrates whether project requirements are being met effectively (for example, are avoiding and minimising impacts as intended) or where work practices require revision. Specific objectives of the daily monitoring are:

- Confirm Contractors' understanding of social, employment and cultural heritage requirements

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- Verify performance in implementing ESMS requirements for effective avoidance or mitigation of negative impacts
- Determine whether mitigation measures and/or avoidance controls are adequate and have been implemented in a timely manner
- Identify effective corrective actions to be implemented within a set timeframe (to be defined at the time of corrective action identification should mitigation measures and/or avoidance controls not deliver the anticipated level of performance)
- Identify whether additional mitigation measures and/or avoidance controls are required to manage impacts

Daily assurance monitoring is undertaken by TAP's ESCH Field Monitors as they visit construction areas as part of their daily work and generate daily ESCH monitoring reports. The reports include:

- Indication of the project location/area inspected
- Indication of the construction activities performed/inspected
- Observation notes providing description of positive aspects, good practice or issues identified
- Reference to the relevant management system document, RSIR KP ID of the constraint applicable to the visited location and related to the field observations made and recorded in the report
- Photographic evidence of the observations made/issues identified
- Reference to the ID of each action required to address issues identified, as recorded in the E&S Issues Tracking Register


Each issue identified triggers a remedial action which is agreed with the Contractor and recorded in the Contractor Action Tracking System.

The TAP ESCH Field Monitors compile and review all daily reports for quality assurance. The completed reports are sent to the respective ESCH Site Lead (as main addressee) and copied to in-country ESCH Experts (to provide support in addressing reported issues if needed) daily or as soon as possible where this cannot be achieved at the end of the day. Reports are reviewed by the ESCH Site Lead (with the support of in-country ESCH Experts if needed) on a daily basis to verify issues recorded and identify those requiring immediate action and reporting in line with the non-conformances and corrective actions process.

8.2.3 Oversight Inspections

Inspections of construction sites/project areas are based on site walk-arounds to observe conditions and identify any non-conformances. The conformance oversight inspections are intended to highlight key conformance aspects and their outcome is used to inform and focus the scope of the social audits.

Focused inspection checklists are used as tools for measuring performance versus commitments to support the conformance oversight inspections. The checklists used include key project commitments and requirements against which Contractor performance is assessed. Checklists focus

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on specific ESCH topics or are designed to address key aspects associated with activities performed at project sites. They are structured to include:

- Indication of the project location/area inspected
- Listing of the commitments, requirements or constraints subject to implementation verification
- Reference to the relevant management system document containing the commitments/requirements verified
- Reference to the KP Register ID of the constraint applicable to the inspected location
- Field observation notes providing indication on how each listed commitment/requirement/constraint is met and identifying any issues or non-conformance
- Observed performance scoring (good practice or non-conformance) based on the implemented non-conformance categorisation
- Reference to the ID of each action required to address issues identified, as recorded in the E&S Issues Tracking Register.

Conformance oversight inspections based on focused checklists are typically performed by the ESCH Field Monitors and, on a case-by-case basis, with oversight by ESCH Site Leads and ESCH Experts. The completed checklists are reviewed by the ESCH Site Lead to verify issues recorded and identify those requiring immediate action and reporting in line with the non-conformances and corrective actions process.


The frequency and scope of conformance oversight inspections is ultimately decided by the in-country E&S Managers. The inspection topic and areas subject to conformance oversight inspections are agreed in the ESCH weekly coordination meetings based on ongoing construction works, risks and potential associated issues. Actions to address observed issues are defined and agreed with the Contractor and recorded in the Contractor Action Tracking System.

8.2.4 ESCH Assurance Audits

Joint H&S and ESCH audits of each Contractor are performed annually or on reaching specific project-delivery milestones. Separate Grievance Management audits are performed annually.

Contractors are formally notified of the ESCH audits, which are performed jointly with the H&S team. The scope of the ESCH audit is defined by the in-country ESCH Experts in co-operation with the corporate ESCH Advisors and may include but is not limited to:

- Contractor ESCH organisation
- ESCH documentation
- Implementation of ESIPs, associated sub-plans, Method Statements, specific ESCH procedures
- ESCH inductions
- Key Performance Indicators (KPIs)
- Non-conformance and incidents reporting, tracking and closure.

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Contractor and the in-country E&S Manager are formally notified of the upcoming joint H&S and ESCH audit in advance. Audit protocols are developed based on the defined scope and communicated in advance of the audit. The audit protocol is used for guidance during the audit and for recording audit observations including good practice and non-conformances. Audit outcomes are summarised in audit reports and formally communicated to the Contractor and in-country E&S Manager. Audit findings are discussed with the Contractor and the TAP In-Country E&S Manager and agreed corrective actions recorded in the relevant Action Tracking System.

8.2.5 Use of Route Impact Registers

Route Environmental Impact and Route Social Impact Registers (REIR and RSIR) collating applicable site-specific social constraints and associated mitigation measures were developed for each host country to provide further detail for ESCH implementation and to support the compliance assurance process. The Registers are used to assist Contractors in the implementation of social commitments and to serve as tools for TAP in ensuring the supervision of implementation.

The Registers are living documents completed by TAP's ESCH Experts and provided to Contractor E&S Managers. TAP ESCH Experts maintain ownership of the master Register, while Contractors maintain their own working versions for planning purposes. The Registers are used to track the status of deliverables throughout the execution phase, providing TAP with oversight of progress. Where applicable, the status of deliverables is tracked to ensure an accurate record of the TAP approval process. Where appropriate, Contractor document reference numbers are indicated for deliverables to provide close-out evidence of all listed constraints.


TAP and the Contractor hold an initial review meeting to agree section boundaries, schedules and other information contained within the Registers. At this point, the Registers become live and are used by the Contractor for preconstruction activities planning and for executing deliverables in line with the schedule. The weekly TAP and Contractor ESCH coordination meetings include a review of the REIR and RSIR to assess:

- Construction progress and schedule changes
- Early identification and resolution actions for seasonal constraint conflicts
- Key new sensitivities identified as a result of pre-construction surveys to be included in the ESCH KP Registers
- Action progress.

The Registers are updated to reflect new information each week. Any updates to the master Registers is agreed by both TAP and the Contractor. It is the responsibility of TAP ESCH Experts to update the master Registers. The Contractor has no access to update, or amend in any way, the master Registers.

8.3 Non-conformances 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

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assurance activities. Further details on management of ESCH non-conformances and corrective actions are provided in Section 5.4.1 of the TAP ESMP (CAL00-PMT-601-Y-TTM-0006).

Contractor is responsible for monitoring the effectiveness of the mitigation measures implemented in line with their own quality system to ensure appropriate rigor and control. The implementation of the corrective mitigation measures is subject to TAP ESCH oversight and assurance.

8.3.1 Non-conformance categorisation

Non-conformances identified through the oversight and assurance process (daily, weekly, monthly monitoring/ inspections and audits) are classified using a 5-level severity scale, aligned with the H&S and ESCH Data, Incident Reporting & Investigation Procedure (TAP-HSE-PR-0011). Non-conformance classification and associated corrective actions required are summarised in Table 5.


Table 5 Non-conformance categories and associated corrective actions

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

Category 1 – 3 non-conformances are addressed through TAP E&S Issues Tracking Register as described in Section 8.3.2 of this document.

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

- **Initiate** – The originating person (Contractor or TAP authorised user) submits the Non-Conformance Report by providing concise non-conformance description, indication of deviated requirement / procedure and identification of location/ area where the non-conformance occurred.
- **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.
- **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 the In-Country Project Manager.
- **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

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actions are implemented, the Contractor Lead (TAP Discipline Lead for TAP non-conformances) enters in the system relevant supporting documentation confirming implementation.

- Close Out - TAP reviewers confirm, validate and close out non-conformance.

The TAP NCR System defined in the Nonconformity Management Procedure (CAL00-PMT-000-V-TPQ-0001) is based on a system tool part of the TAP Project Information Management System (PIMS). It is and operated by authorised users from both TAP and Contractor.

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

Contractors are responsible for monitoring the effectiveness of the mitigation measures implemented in line with their own quality system to ensure appropriate rigour and control, and are subject to TAP verification and auditing within the framework of the ESCH assurance programme.

8.3.2 TAP E&S Issues Tracking Register

Agreed actions addressing non-conformances identified in inspections and audits are recorded in the Contractor Action Tracking System (ATS). Contractor's ATS is intended to capture most of such actions since most compliance assurance activities throughout the construction and commissioning phases relate to Contractor scope of activities.

In parallel to Contractor ATS, the in-country E&S Manager or his/her delegate operates TAP ATS in the form of E&S Issues Tracking Register. The intent of TAP tracking register is to record TAP-specific actions so that TAP compliance oversight and assurance activities can be managed, organised and implemented.


8.4 Reporting

The key social performance indicators that are collated and reported by the TAP in-country E&S Manager to TAP E&S Manager on monthly basis are provided in Table 6 below.

Section 7 of the E&S Compliance Assurance Plan (CAL00-PMT-601-Y-TTM-0005) details other KPIs (ecological, environmental management system, oversight and assurance, change management, cultural heritage, etc.) reported as part of the MPR are detailed.

Table 6 Key Performance Indicators

KPI topic	KPI
Social performance	Total social incidents (number)
	Social incidents (category 3/4/5) (number)
	Social incidents (category 1/2) (number)
	Number of social incidents by type: due to community actions (land-related) (number)
	Number of social incidents by type: due to community actions (non-land-related) (number)

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KPI topic	KPI
	Number of social incidents by type: due to industrial actions (number)
	Engagement: number of stakeholder meetings/community awareness sessions
	Local content: Employees from local project-affected communities (%) Employees from host country € spent on host country goods and services

TAP reports the relevant compliance monitoring data to the appropriate authorities as required under the permitting conditions.

8.5 Contractor Compliance Assurance and Monitoring

TAP's requirements of the Contractor in terms of compliance assurance are defined within the Onshore and Offshore Compliance Monitoring CCPs. Contractors are required to prepare their own specific ESIPs setting out how they will meet and comply with specific project commitments set out in the CCPs developed by TAP. These requirements include:


- Development of an overarching ESMS Manual
- Preparation of a range of subordinate ESIPs that address respective CCPs
- Undertaking pre-construction surveys and ESCH assessments to identify and manage ESCH risks
- Implementation of Contractor's inspection and audit programme
- Identification, reporting and closure of non-conformances
- Incident notification and reporting
- ESCH monitoring programme
- Action Tracking System

8.5.1 Contractor Inspections and Audits

To provide assurance that the provisions of the ESMS documents (CCPs, ESIPs, sub-plans) are implemented effectively, Contractors implement a programme of documented inspections and audits, as defined in the Compliance Monitoring ESIPs.

The programme encompasses:

- walk-around inspections during construction activities at sites and impacted areas (including third party sites such as quarries or batching plants) to visually monitor that mitigation measures specified within pre-construction surveys or each of the environmental, social and cultural heritage ESIP (or other applicable ESMS document) have been implemented
- joint inspections with TAP using checklists

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- due diligence assessment of third-party quarry and batch plant sites prior to use, including an appropriate level of documented ESCH assessment submitted to TAP. The ESCH assessments will demonstrate that use of the sites is undertaken in alignment with the relevant TAP CCP, ESIA requirements and local regulations
- engagement with project affected parties, stakeholders and regulators.

Contractor internal audits are performed in line with each Contractor Compliance Monitoring ESIPs, management system procedures and internal audit and verification plans approved by TAP. These audits are performed by an interdisciplinary team of appropriately qualified environmental, social, and cultural heritage auditors. TAP ESCH staff may join the audit team and participate in the Contractor internal audits.

8.5.2 Contractor Non-conformance and Incident notification

Contractor shall notify TAP of all ESCH incidents and near misses in accordance with provisions and timeframes detailed in Section 5.3 and Table 5.1 of the H&S and ESCH Data, Incident Reporting & Investigation Document (TAP-HSE-PR-0011).

Contractor shall align categorisation and reporting of formal non-conformances with the severity definitions and reporting timeframes of ESCH Incidents as detailed within H&S and ESCH Data, Incident Reporting & Investigation Document (TAP-HSE-PR-0011). Depending on the nature and severity of the non-conformance, Contractor shall record a formal non-conformance in its own non-conformance system and submit a formal non-conformance report within TAP NCR system. TAP In-Country E&S Manager shall review and qualify non-conformance reports submitted by Contractor within TAP NCR system. Further details on NCR reporting is provided in Section 5 of this document.

Non-conformances identified as result of inspections, monitoring and audits performed are to be recorded by Contractor and along with corrective actions shall also be raised at the regular interface / coordination meetings.

In line with the Compliance Monitoring CCP and Contractor Compliance Monitoring ESIPs, the Contractor notifies TAP of each non-conformance identified within 24 hours of occurrence or of the Contractor receiving ESCH monitoring result(s) indicating a non-conformance. Within 48 hours of occurrence or receipt of a monitoring result indicating non-conformance, the Contractor shall notify TAP in a written report (in the English language).


8.6 Contractor Action Tracking System

Contractor operates an Action Tracking System (ATS) that records corrective actions proposed in response to all ESCH issues, observations, non-conformances and incidents. In addition to the corrective actions, the ATS records the responsible party and timescale for completing each action.

TAP ESCH teams review Contractor ATS on a regular basis to follow up on progress and to confirm action closure.

8.6.1 Contractor ESCH Monitoring Requirements

The programmes, protocols and procedures for monitoring the implementation and outcomes of the ESCH mitigation measures, ESCH KPIs data acquisition and ESCH monitoring are defined by each Contractor in their Compliance Monitoring ESIPs.

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The construction-phase monitoring requirements for Contractors are specified in the Onshore and Offshore Compliance Monitoring CCPs and ESIPs. Contractor ESCH monitoring requirements include but may not be limited to:

- Environmental and social restrictions and sensitivities
- Water and wastewater
- Erosion and sedimentation
- Resource management
- Footprint management
- Reinstatement
- Air emissions
- Noise and vibration
- Pollution prevention
- Waste management
- Social aspects.


The monitoring frequencies, parameters, methodology and duration are agreed on a case-by-case basis with TAP.

The ESCH parameters to be monitored by Contractors for each of the above topics are specified in the ESCH management plans and Contractor CCPs.

Prior to initiating construction works at a specific project location, the Contractor is required to perform pre-construction surveys to identify risks and support mitigation planning and implementation. The Contractor is responsible for ensuring that planning and execution of pre-construction surveys are performed with sufficient time in advance of construction initiation.

The scope of pre-construction surveys is defined on a case-by-case basis with consideration of monitoring requirements specified in the Compliance Monitoring CCPs and applicable ESCH constraints identified in the ESCH KP Registers. Furthermore, as a general requirement, in cases where construction activities involve operations associated with elevated noise levels to be performed outside the 06:00 – 22:00 hours period, the pre-construction surveys include a noise assessment to identify sensitive noise receptors, applicable mitigation measures and noise threshold levels against which monitoring will be performed during construction. Similarly, in the case of blasting and hammering activities to be performed near standing buildings or structures (typically at a distance of less than 50m), the pre-construction surveys include a pre-construction conditions assessment of the respective structures, based on consultation and agreement with their owners. A similar assessment is performed at the end of blasting/hammering activities to document any potential damage occurred and define any required remediation or compensation needed.

The planning and scope of pre-construction surveys are confirmed with TAP. In cases where there are known gaps in the available baseline data, this is flagged by TAP in the REIR / RSIR including an indication of requirements for specific monitoring to be performed prior to construction initiation.

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8.7 Contractor Reporting

Contractor is required to report to TAP on monthly basis the monitoring results, inspection information and performance data as part of the Contractor Monthly ESCH Report or more frequently when requested by TAP. The monitoring frequencies, parameters, methodology and duration are determined for construction activities on a case by case basis, dependent on construction activity type and location. Monitoring results are to be reported to TAP as a part of Contractor Monthly ESCH Report.

TAP has an oversight role in reviewing Contractor Monthly ESCH Report to examine or query reported performance. Review of Contractor Monthly ESCH Report, performance statistics and monitoring data is to be undertaken primarily by TAP In-Country E&S Manager or his/her delegate with support as required from the field team with the results of the review communicated to the TAP In-Country E&S Manager for use at:

- the regular Project Management Leadership Team meetings
- the regular meeting with the In-Country E&S and IPMT Construction Managers

TAP country ESCH team shall provide a monthly performance report (MPR) to TAP E&S Manager on overall Project ESCH performance.