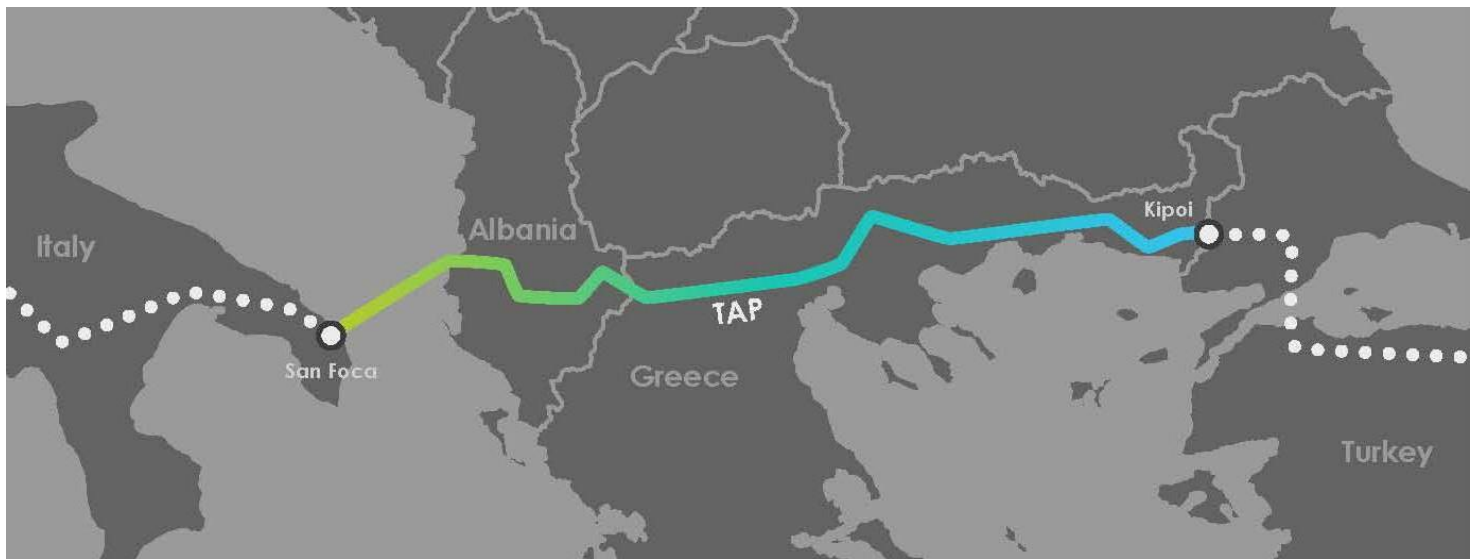




Trans Adriatic
Pipeline



Environmental and Social Action Plan

Trans Adriatic Pipeline (TAP) ESAP - 27 June 2018

Item	Lender Guideline	Environmental & Social Risk	Required Action	Responsible party	Time frame	Target & Evaluation Criteria for Successful Implementation	Status
1	PR1/PS1/EIB1	Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plan (ESMP) following any expansion of the initial capacity of the Pipeline requiring incremental investments by TAP (an Expansion).	If the development of an Expansion requires changes to be made to the ESIAs or the ESMP, those changes will be implemented to ensure compliance with the Environmental and Social Requirements, in each case, in accordance with the Finance Documents.	TAP	Scope of work to update relevant ESIA/ESMP documents to be provided to Anchor Lenders and the Lenders' Environmental and Social Consultant (IESC) for review and comment at least 6 months prior to any Expansion. At a minimum, revised ESIA/ESMP documents to be in place at least 2 months prior to any construction activities related to an Expansion.	In circumstances where an ESIA or an ESMP is revised, those revised documents will be disclosed on TAP's website in English and the relevant national language.	Open
2	PR1/PS1/EIB1	Environmental and Social Management Plans	Where required, TAP will update the ESMPs prior to physical completion/operations to reflect the dynamic aspects of Project development (and differences between construction & operations).	TAP	2 months prior to physical completion / commencement of operations.	Revised ESMPs to be provided to the Anchor Lenders and the IESC for review and approval to ensure compliance with the Environmental and Social Requirements, in each case, in accordance with the Finance Documents. In circumstances where an Environmental and Social Management Plan is revised, those revised documents will be disclosed on TAP's website in English and the relevant national language.	Open
3	PR1/PS1/EIB6	Independent Environmental and Social performance monitoring	An Independent External Monitoring Group (IEMG) to be set up, the scope of which will cover review/monitoring of the performance (and compliance with the Environmental and Social Requirements) of: <ul style="list-style-type: none"> • Environmental and ecological management including re-instatement • Social impact management, stakeholder engagement and grievance management • Livelihoods restoration and related compensation • Workforce and welfare management • Health and safety management at worksite and communities • Cultural heritage <p>The IEMG will involve third-party monitors and civil society including Project-affected stakeholders.</p>	TAP	Appoint IEMG: Q3 2018 or by Financial Close, whichever comes first. Publication of IEMG Work Plan on TAP's website: Q3 2018 or by Financial Close, whichever comes first.	TAP will issue externally on its website a work plan agreed with the IEMG that will include background information, duties and coordination, group membership, annual monitoring visit and reporting schedule, and reporting and disclosure process (IEMG Work Plan). IEMG to hold at least one meeting per Host Country in 2018. Reports on the outputs of the IEMG Work Plan and TAP's responses to be shared with Anchor Lenders on a 6 monthly basis.	Open

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4	PR2/PS2/EIB9	Voluntary Principles on Security and Human Rights (VPSHRs) implementation and monitoring	TAP to engage independent VPSHRs experts to monitor the implementation of Project commitments during construction activities. The scope and local presence of VPSHRs experts will be commensurate with the VPSHRs risk.	TAP/ TAP Sub-contractor	Q3 2018 –VPSHRs implementation monitoring framework to be agreed with Anchor Lenders to ensure compliance with the Environmental and Social Requirements in accordance with the Finance Documents. Q3 2018 – TAP to implement VPSHRs monitoring framework as agreed with the Anchor Lenders.	Reports (as defined in VPSHRs monitoring framework) from VPSHRs experts to be shared with the Anchor Lenders.	Open
5	PR2/PS2/EIB9	Labour and working conditions	TAP to revise its compliance and assurance plan to enhance its current approach to labour and working conditions, oversight assurance and auditing of its contractors. Key areas of focus to include contracts, labour practices, equal opportunities, compensation and benefits, retrenchment, worker representation, non-employee workers and grievance management.	TAP/ TAP Sub-contractor	Q3 2018 - TAP to share with the Anchor Lenders and IESC a revised compliance and assurance plan for review by the Anchor Lenders and their approval to ensure compliance with the Environmental and Social Requirements in accordance with the Finance Documents.	TAP to issue to Anchor Lenders labour and working condition audit reports as part of TAP's periodic self-monitoring reporting requirements as set out in the Finance Documents (at a minimum on a 6 monthly basis during construction).	Open
6	PR3/PS3/EIB2	Green House Gas (GHG) management plan	Development of an operational phase GHG management plan. This should include an overview of the Project's design (related to emissions abatement/minimisation), a summary of relevant Best Available Techniques assessment findings, monitoring programme and public GHG reporting commitments, in line with the requirements of the Anchor Lenders' GHG accounting methodology.	TAP	Q2 2019 - Draft GHG management plan to be provided to Anchor Lenders and IESC for review and approval to ensure compliance with the Environmental and Social Requirements in accordance with the Finance Documents. Final plan in place by Q4 2019.	Final GHG management plan to be disclosed on TAP's website.	Open
7	PR3/PS3/EIB2	Reinstatement and soil erosion protection measures in areas with steep slopes	TAP to provide regular updates to the Anchor Lenders on their ongoing quarterly review of contractor work in areas of steep slopes as conducted by TAP's subject matter experts, and allow periodical participation (at least once per year) by the Anchor Lenders on such reviews to observe right of way management and soil erosion control measures.	TAP	Quarterly updates from 1Q 2018 onwards until physical reinstatement is complete.	Quarterly updates.	Open
8	PR5/PS5/EIB 6	Livelihood and Transitional Support (LATS) and vulnerable person implementation plans	TAP to provide the Anchor Lenders with the LATS implementation plans for each Host Country and TAP to provide monitoring reports to Anchor Lenders on a six monthly basis.	TAP/TAP Sub-contractors	LATs implementation plans in place by the end of Q3 2018.	LATs implementation plans in place by end of Q3 2018. 6 monthly monitoring reports to be provided to the Anchor Lenders.	Open
9	PR5/PS5/EIB 6	Land acquisition/compensation methodologies and ongoing	TAP to conduct an external review of land acquisition/compensation methodologies and utilise that review in grievance resolution and stakeholder engagement processes.	TAP/TAP Sub-contractors	Draft report to be provided to Anchor Lenders and IESC for review and approval to ensure compliance with the	Final report and implementation plan (if	Open

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		engagement with complainants on land compensation issues			Environmental and Social Requirements in accordance with the Finance Documents by Q3 2018. Final Report by Q4 2018.	appropriate), in place by Q4 2018.	
10	PR6/PS6/EIB3	Supplementary pre-construction marine surveys will be undertaken to support construction planning and preparation of relevant marine management plans and construction method statements prepared by the EPC Contractors and approved by TAP.	<p>TAP will carry out the following future activities:</p> <ul style="list-style-type: none"> Completion of marine environmental seabed and water column surveys in Albania in Q4 2017 /Q1 2018. Review of deep water critical habitat seabed data and anchoring plans to define the scope and schedule of the additional geophysical data and remotely operated vehicle (imagery) survey by the end of March 2018 Engagement with the Italian competent authorities and finalization of all Italian water marine management plans prior to the start of marine construction work, these will include: <ul style="list-style-type: none"> Bioconstruction management plan Sea grass management plan Marine Megafauna Mitigation Protocol (MMMP)* Deep water marine management plan Development of a rock placement management plan that includes: cross-reference to activity-specific Marine Mammal Observer (MMO) procedures/controls; placement controls (chute, video control etc.); use of washed, inert rock; and analysis to define minimum rock size to avoid wash-out. <p>*MMOs procedures will be developed within the updated MMMP specific to all relevant offshore construction activities including geophysical surveys, dredging, piling, rock placement and construction vessel movement and anchoring (to support implementation of the vessel code of code).</p>	TAP/TAP Sub-contractors	<p>All surveys to be completed at least 4 months prior to marine construction (as per approach outlined in the ecological management plan).</p> <p>Anchor Lenders' /IESC's approval to ensure compliance with the Environmental and Social Requirements in accordance with the Finance Documents to be obtained 2 months prior to the start of marine construction.</p>	<p>Following completion of the additional marine surveys, TAP will update, where required, the ecological management plan (including marine route impact environmental register for Italy/Albania), critical habitat assessment, supplementary ecological assessment, biodiversity offset strategy and Italian and Albanian cultural heritage management plans.</p> <p>These revised plans will be provided to Anchor Lenders and IESC for review and approval to ensure compliance with the Environmental and Social Requirements in accordance with the Finance Documents.</p> <p>Updated plans to be disclosed on TAP's website.</p>	Open
11	PR6/PS6/EIB3	Biorestitution Management Plan	TAP to develop a biorestitution management plan in accordance with commitments outlined in the ecological management plan.	TAP	<p>End of Q3 2018 - Biorestitution management plan provided to Anchor Lenders and IESC for review and approval to ensure compliance with the Environmental and Social Requirements in accordance with the Finance Documents.</p> <p>End of Q4 2018 - Final Biorestitution Management Plan to be in place.</p>	<p>Final biorestitution management plan to be disclosed on TAP's website in English and the relevant national language.</p> <p>Implementation of final biorestitution management plan from Q4 2018 onwards.</p>	Open
12	PR6/PS6/EIB3	Supplemental bat surveys	<p>Complete additional bat survey work in Italy to include:</p> <ul style="list-style-type: none"> Daytime visual assessment of trees to identify potential roost features (PRF); and Preconstruction Surveys: (Ultrasonic detector and/or endoscopic) to establish usage of those trees found to have low/moderate (Category 2) or high (Category 3) PRFs. 	TAP	<p>Daytime surveys: to be completed prior to tree translocation.</p> <p>Pre-construction surveys: to be completed no more than one week before translocation of the trees.</p>	<p>Survey reports, Route Environmental Impact Register (REIR) & site specific method statements, where required, provided to Anchor Lenders & IESC for review to ensure compliance with the Environmental and Social Requirements in accordance with the Finance Documents.</p>	Open

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13	PR6/PS6/EIB3	Biodiversity Offsets	TAP and its biodiversity advisor(s) will reassess potential residual impacts to critical habitat and priority biodiversity features following reinstatement. In doing so, TAP will update the critical habitat assessment and develop a more comprehensive Biodiversity Offset Management Plan (BOMP) to provide additional details and to refine the Project's approach on biodiversity offset design, intended conservation outcomes, specific management actions (including a detailed biodiversity action plan) and details on the legal mechanisms of securing and establishing the prospective site(s).	TAP, External Biodiversity Experts	<p>Anchor Lenders and TAP to agree on BOMP scope of work in or before Q3 2018.</p> <p>Anchor Lenders to have non-objection rights with the selection of the BOMP consultant.</p> <p>Draft BOMP to be provided in or before Q2 2019.</p> <p>Final BOMP to be approved by Anchor Lenders to ensure compliance with the Environmental and Social Requirements in accordance with the Finance Documents in or before Q3 2019.</p> <p>Implementation of BOMP from Q4 2019 onwards.</p>	Final BOMP to be disclosed on TAP's website.	Open