ESIA Italy
Section 9 Environmental and Social Management and Monitoring
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9 ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING

9.1 Overview

This Section sets out TAP AG’s approach to the management and monitoring of environmental and social issues related to the construction, operation and decommissioning of the Italian section of the Trans Adriatic Pipeline (TAP) project (hereinafter referred to as ‘the Project’) as requested by D.Lgs. (Legislative Decree) 152/06, art. 28:

"Il provvedimento di valutazione dell’impatto ambientale contiene ogni opportuna indicazione per la progettazione e lo svolgimento delle attività di controllo e monitoraggio degli impatti."

"The EIA permit contains any relevant information for the design and the implementation of management activities and monitoring of any impacts."

The main objective of the Section is to provide a framework for the implementation of the measures identified in Section 8 of this ESIA to avoid, mitigate or offset potential adverse impacts. It therefore seeks to minimise and manage risks to the environment, construction and operation staff and the local population from Project activities that may cause harm or nuisance, and where possible, to increase positive effects of project implementation.

TAP AG acknowledges that the level of detail provided here does not yet meet international best practice as outlined in Paragraph 9 of the Performance Requirement 1 of the EBRD. Therefore, a detailed Environmental and Social Management and Monitoring Plan (ESMMP) reflecting what stated above will be fully integrated into an Environmental and Social Management System (ESMS). It will be designed to ensure that all mitigation measures and commitments made by TAP AG in the ESIA, as well as in other relevant documents, will be implemented in practice both by TAP AG themselves and the contractors working on behalf of TAP AG. The development of this system will be carried out after the finalization of the ESIA but in advance of any key construction contracts being awarded. TAP AG will disclose the draft ESMMP for comment. TAP AG will then finalise the ESMMP based on these comments before disclosing it at similar places etc. as the final ESIA.

The broad purpose of this Section is to:

- Define strategies, methods and control approaches to ensure implementation of measures to mitigate potentially adverse environmental and social impacts;
- Ensure that good construction practices with regards to environmental and socioeconomic management are adopted during all phases of the Project (engineering, construction and pre-commissioning, operation and maintenance, and decommissioning);
- Provide a framework for mitigating impacts that may be unforeseen or unidentified until construction is underway;
• Provide assurance to third parties that their requirements with respect to environmental and social performance will be met; and

• Provide a framework for compliance auditing and inspection so that TAP AG may be assured that its aims with respect to environmental and social performance is being met.

The following tables present management, mitigation and monitoring actions and the responsible parties to address Project environmental and socioeconomic issues/risks, as identified through the ESIA process, together with a cross-reference to the relevant EBRD Performance Requirement(s) and legal requirements, key performance indicators and implementation timeline.

The tables are presented in the following order:

• Table 9-1: Construction Phase Environmental and Social Management (onshore);
• Table 9-2: Construction Phase Environmental and Social Management (offshore);
• Table 9-3: Operation Phase Environmental and Social Management (onshore);
• Table 9-4: Operation Phase Environmental and Social Management (offshore); and
• Table 9-5: Decommissioning Phase Environmental and Social Management.

In Section 9.2 a description of roles and responsibilities with respect to environmental and social management is provided, including a discussion on the role of the contractors engaged by TAP AG.

Section 9.3 provides a summary of the anticipated monitoring programmes as set out in the following tables:

• Table 9-6: Outline of Monitoring Programme: Construction Phase;
• Table 9-7: Outline of Monitoring Programme: Operation Phase; and
• Table 9-8. Outline of Monitoring Programme: Decommissioning phase.

A number of issue-specific management plans will also be developed to address key areas of potential environmental and social impacts and risks. These are discussed in Section 9.4.

It should be noted that the tables presented below show summarised / aggregated mitigation measures, but do not present a comprehensive list of all recommended measures. These are presented in detail in Section 8 of the ESIA and relevant Annexes; reference to these documents are made where necessary, so that the reader can find the more comprehensive explanation of mitigation measures for each impact.
Table 9-1  Construction Phase Environmental and Social Management (onshore)

<table>
<thead>
<tr>
<th>EBRD PR Reference</th>
<th>Issue / Risk (ESIA Impact section reference)</th>
<th>Description of Activity / Mitigation Measures</th>
<th>Requirement: Legal and/or International Best Practice</th>
<th>Responsibility</th>
<th>Key Performance indicator</th>
<th>Implementation Timeline*</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Air</strong></td>
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<td></td>
<td></td>
<td>Before start and during construction</td>
</tr>
<tr>
<td>• PR 3 Pollution Prevention and Abatement (Paragraphs 10 and 11)</td>
<td>• Direct impact on health (potential annoyance at residential buildings closest to work sites and PRT1) (8.6.2.3)</td>
<td>• Direct impact on fauna (potential disturbance and/or displacement, reduction of usable habitat) (8.6.2)</td>
<td>• Specification of low noise compressors/equipment for hydrotesting activities;</td>
<td>• TAP management;</td>
<td>• Periodic monitoring of compliance with:</td>
<td>• Before start of construction.</td>
</tr>
<tr>
<td>• PR 4 Community Health, Safety and Security (Paragraphs 16 and 17)</td>
<td>• Direct impact on human health (potential annoyance at residential buildings closest to work sites and PRT1) (8.6.2.3)</td>
<td>• Direct impact on fauna (potential disturbance and/or displacement, reduction of usable habitat) (8.6.2)</td>
<td>• Switch off equipment when not in use;</td>
<td>• Contractors for Plans implementation.</td>
<td>• the Project design</td>
<td>• During construction.</td>
</tr>
<tr>
<td>• PR 3 Pollution Prevention and Abatement (Paragraphs 10 and 11)</td>
<td>• PR 4 Community Health, Safety and Security (Paragraphs 16 and 17)</td>
<td>• Direct impact on human health (potential annoyance at residential buildings closest to work sites and PRT1) (8.6.2.3)</td>
<td>• Whenever feasible, schedule different noisy activities to occur concurrently;</td>
<td>• Adherence to ESIA, Project Design.</td>
<td>• • Project activity restrictions schedule</td>
<td>• Before start of construction.</td>
</tr>
<tr>
<td>• PR 4 Community Health, Safety and Security (Paragraphs 16 and 17)</td>
<td>• Direct impact on fauna (potential disturbance and/or displacement, reduction of usable habitat) (8.6.2)</td>
<td>• Direct impact on fauna (potential disturbance and/or displacement, reduction of usable habitat) (8.6.2)</td>
<td>• Locate stationary equipment (e.g. compressors for hydrotesting) as far as practicable from nearby receptors;</td>
<td>• Noise barriers;</td>
<td>• Offer people who live close to the microtunnel construction area the opportunity to temporarily relocate if the measures identified above are not deemed adequate (specifically during hydrotesting activities);</td>
<td>• During construction.</td>
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</table>

**Noise**

<table>
<thead>
<tr>
<th>EBRD PR Reference</th>
<th>Issue / Risk (ESIA Impact section reference)</th>
<th>Description of Activity / Mitigation Measures</th>
<th>Requirement: Legal and/or International Best Practice</th>
<th>Responsibility</th>
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<td>• During construction.</td>
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</table>

**Soil And Water**

<table>
<thead>
<tr>
<th>EBRD PR Reference</th>
<th>Issue / Risk (ESIA Impact section reference)</th>
<th>Description of Activity / Mitigation Measures</th>
<th>Requirement: Legal and/or International Best Practice</th>
<th>Responsibility</th>
<th>Key Performance indicator</th>
<th>Implementation Timeline*</th>
</tr>
</thead>
<tbody>
<tr>
<td>• PR 3 Pollution Prevention and Abatement (Paragraph 10)</td>
<td>• Adherence to Pollution Prevention, Chemical, Waste and Soil Management Plans;</td>
<td>• Adherence to Pollution Prevention, Chemical, Waste and Soil Management Plans;</td>
<td>• Adherence to Pollution Prevention, Chemical, Waste and Soil Management Plans;</td>
<td>• TAP management;</td>
<td>• Periodic sampling of onshore pipeline hydrotesting discharged water</td>
<td>• Before start of construction.</td>
</tr>
<tr>
<td>• PR 3 Pollution Prevention and Abatement (Paragraph 10)</td>
<td>• Fuel storage systems will be built, above ground and within double-walled tanks or containment bunds.</td>
<td>• Fuel storage systems will be built, above ground and within double-walled tanks or containment bunds.</td>
<td>• Fuel storage systems will be built, above ground and within double-walled tanks or containment bunds.</td>
<td>• Contractors for Plans implementation and for compliance with limits/prescriptions</td>
<td>• Periodic monitoring of subcontractor list of materials</td>
<td>• During construction.</td>
</tr>
<tr>
<td>• PR 3 Pollution Prevention and Abatement (Paragraph 10)</td>
<td>• Procedures for vehicle/equipment refueling will be implemented to prevent spillage.</td>
<td>• Procedures for vehicle/equipment refueling will be implemented to prevent spillage.</td>
<td>• Procedures for vehicle/equipment refueling will be implemented to prevent spillage.</td>
<td>• Adherence to ESIA, Project Design.</td>
<td>• Periodic monitoring of application of Chemical Management Plan</td>
<td>• Before start of construction.</td>
</tr>
<tr>
<td>EBRD PR Reference</td>
<td>Issue / Risk (ESIA Impact section reference)</td>
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<td>Requirement: Legal and/or International Best Practice</td>
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</table>
| PR3 Pollution Prevention and Abatement, (Paragraphs 10, 12 and 13) | Potential contamination of freshwater resources by solid and liquid wastes (8.5.3.3) | • No waste water will be directly discharged into water receptors  
• All liquid waste will be collected, stored and transported separately in appropriate and approved bins and containers  
• Adherence to Pollution Prevention, Chemical, Water and Waste Management Plans. | • International Best Practice  
• Legal references:  
  - Water Directive (2000/60 EC),  
  - Environmental quality standards for priority substances and certain other pollutants, Directive 2008/105/EC;  
  - Italian Legislative Decree 152/2006 | Qualified environmental specialist,  
TAP management,  
Contractors for Plans implementation and for compliance with limits/prescriptions | • Initial monitoring of subcontractor list of materials.  
• Periodic monitoring of drilling mud used.  
• Periodic monitoring of application of Waste Management Plan.  
• Periodic monitoring of application of Chemical Management Plan | • Before start of construction.  
• During construction. |
| PR3 Pollution Prevention and Abatement (Paragraphs 10, 12 and 13) | Contamination of Soil by Solid and Liquid Wastes (8.5.4.3) | • No waste will be directly discharged into the soil or water  
• All liquid waste will be collected, stored and transported separately in appropriate and approved bins and containers  
• Adherence to Pollution Prevention, Chemical Management and Waste Management Plans. | • “Dutch Intervention Values or New Dutch List” widely accepted in Europe as a benchmark for soil pollution and remediation (Annex A of the 2009 Soil Remediation Circular;  
D.Lgs. 152/2006 | TAP management,  
Contractors for Plans implementation | • Periodic monitoring of application of Waste Management Plan  
• Periodic monitoring of application of Chemical Management Plan | • Before start of construction.  
• During construction. |
| PR1 Environmental and Social Appraisal and Management, (Paragraph 5) | Land take (8.5.4.3) | • No machinery will be permitted to leave the access roads or the working strip and other dedicated areas;  
• Drivers will be trained on mitigation measures and on the traffic management plan. | • International Best Practice  
• Guidelines of Soil Quality  
• Assessment in Conservation Planning (United States Department of Agriculture – 2001) | Construction contractors | Periodic monitoring | • Before start of construction.  
• During construction. |
| PR1 Environmental and Social Appraisal and Management, (Paragraph 5) | Potential Disturbance and Degradation of Soil (8.5.4.3) | • Topsoil will be stored separately and will not be mixed with other trenched materials.  
• Aeration and raking up will be carried out regularly to avoid compaction  
• Adherence to Pollution Prevention, Waste and Soil Management Plans;  
• International Best Practice | • Construction contractors  
• Contractors for Plans implementation | • Periodic monitoring of soil handling  
• Records will be made of the existing condition of the restoration and will be used as the standards  
• Restoration and erosion control measures will be monitored | • After conclusion of restoration works | • During construction  
• After conclusion of restoration works |

**Landscape and Visual Amenity**

| PR1 Environmental and Social Appraisal and Management, (Paragraph 5) | Presence of machinery, vehicles and facilities | Planning of the construction period in order not to interfere with the tourist season.  
• Adherence to Traffic and Landscape Management Plans;  
• The characterization of the proposed TAP on landscape and visual amenity will be undertaken in accordance with accepted methodologies derived from best practice guidelines.  
• D.P.C.M. 12 December 2005.  
• D.G.R. n. 711045 (Lombardy Region) dated 8 November 2002 | TAP management,  
Contractors for Plans implementation. | Site monitoring reports provided by appropriate landscape/ecological site supervisor during construction will verify that restricted working widths have been adhered to. | During construction. |
<table>
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<tr>
<th>EBRD PR Reference</th>
<th>Issue / Risk (ESIA impact section reference)</th>
<th>Description of Activity / Mitigation Measures</th>
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<th>Responsibility</th>
<th>Key Performance Indicator</th>
<th>Implementation Timeline*</th>
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</thead>
</table>
| PR1 Environmental and Social Appraisal and Management, (Paragraph 5) | Lighting impact during the night period | Use of specifically designed lighting equipment | • The characterization of the proposed TAP on landscape and visual amenity will be undertaken in accordance with accepted methodologies derived from best practice guidelines.  
• D.P.C.M. 12 December 2005.  
• D.G.R. n. 7/18845 (Lombardy Region) dated 8 November 2002 | TAP management  
• Construction contractors | Periodic monitoring of application of mitigation measures. | • Before start of construction.  
• During construction. |

**Biological Environment**

| EBRD PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources (Paragraph 5) | Loss of natural vegetation (8.6.2.2) | Minimization of natural habitat loss in locating TAP work sites;  
Microtunneling method adopted when crossing natural habitats;  
Reconstruction of dry stone walls;  
Adherence to Biodiversity Action Plan; | • EBRD, Italian legislation, Bern Convention  
• EU Natura Legislation  
• International Best Practice  
• IFC PS6 | TAP management  
• Contractors for Plans implementation | Pre / During / Post Construction Survey.  
• Monitoring implementation of mitigation measures.  
• Site monitoring reports provided by appropriate landscape/ecological site supervisor during construction will verify that restricted working widths have been adhered to. | • Before start of construction.  
• During construction;  
• After construction. |

| EBRD PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources (Paragraph 5) | Alteration of abiotic components in ecosystems (8.6.2.2) | • Avoid alteration of abiotic components through adequate safety facilities;  
• Adherence to Biodiversity Action and Landscape Management Plans | • EBRD, Italian legislation, Bern Convention  
• EU Natura Legislation  
• International Best Practice  
• IFC PS6 | TAP management  
• Contractors for Plans implementation | Pre / During / Post Construction Survey.  
• Monitoring implementation of mitigation measures.  
• Site monitoring reports provided by appropriate landscape/ecological site supervisor during construction will verify that restricted working widths have been adhered to. | • Before start of construction.  
• During construction;  
• After construction. |

| EBRD PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources (Paragraph 5) | Light pollution (8.6.2.2) | • Lighting in compliance with the best practices;  
• Use of lights limiting the diffusion of light upwards | • EBRD, Italian legislation, Bern Convention  
• EU Natura Legislation  
• International Best Practice  
• IFC PS6 | TAP management  
• Contractors for Plans implementation | Pre / During Construction Survey.  
• Monitoring implementation of mitigation measures. | • Before start of construction  
• During construction. |

| EBRD PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources (Paragraph 5) | Modification in the ecological network (8.6.2.2) | • Microtunneling technique adopted when crossing natural habitats;  
• Reconstruction of dry stone walls;  
• Planting trees and shrubs in hedges;  
• Reinstatement of olive trees  
• Adherence to Biodiversity Action and Landscape Management Plans | • EBRD, Italian legislation, Bern Convention  
• EU Natura Legislation  
• International Best Practice  
• IFC PS6 | TAP management  
• Contractors for Plans implementation | Pre / During / Post Construction Survey.  
• Monitoring implementation of mitigation measures. | • Before start of construction  
• During construction;  
• After construction. |

| EBRD PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources (Paragraph 5) | Increasing collision rate from traffic (8.6.2.2) | • Speed limits;  
• Measure to prohibit “off-route” driving;  
• Drivers will be trained on the Traffic Management Plan; | • EBRD, Italian legislation, Bern Convention  
• EU Natura Legislation  
• International Best Practice  
• IFC PS6 | TAP management  
• Contractors for Plans implementation | Pre / During Construction Survey.  
• Monitoring implementation of mitigation measures. | • Before start of construction  
• During construction. |
<table>
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<tr>
<th>EBRD PR Reference</th>
<th>Issue / Risk (ESIA Impact section reference)</th>
<th>Description of Activity / Mitigation Measures</th>
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<th>Implementation Timeline*</th>
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<tr>
<td><strong>Economy and Employment</strong></td>
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<tr>
<td>PR2 Labour and Working Conditions (Paragraph 10)</td>
<td>Unmet community expectations of employment (8.7.1.2) Temporary employment and economic impact – national level and local level; Vulnerable groups; Skill and capacity enhancement</td>
<td>All job vacancies will be listed clearly with skills and experience required to fill the position, as well as the duration of the employment contract. Clear information on the recruiting process and the selection criteria will be publicly available and easy to access.</td>
<td>EBDR PR2, PR10 IFC PS and IFC General EHS Guidelines International Best Practice</td>
<td>TAP management Contractors</td>
<td>Pre / During / Post Construction Survey Monitoring implementation of mitigation measures.</td>
<td>Before start of construction. During construction. After construction.</td>
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<tr>
<td>Land and Livelihoods</td>
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<tr>
<td>• PR5 Land Acquisition, Involuntary Resettlement and/or Economic Displacement</td>
<td>Temporary loss of livelihood and household income in agriculture (8.7.2.2)</td>
<td>Livelihoods Restoration Plan: cadastral data identify landowners and secure land titles, additional assistance for severely affected owners, and compensation at replacement value.</td>
<td>EBDR PR5, PR7, PR10 IFC PS and IFC General EHS Guidelines International best practice</td>
<td>TAP management</td>
<td>Cadastral data enhanced and updated within 2-km corridor, continue consulting with all affected stakeholders to understand owner preferences and compensate appropriately for any economic displacement from temporary (and permanent) losses in land use or crop productivity.</td>
<td>Before start of construction. Throughout construction and following construction as appropriate</td>
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<tr>
<td>• PR10 Information Disclosure and Stakeholder Engagement</td>
<td>Decreased land value (8.7.2.2)</td>
<td>• Livelihood Restoration Plan. • Assess the productivity of land being crossed by the Project to understand variations in land value and associated productivity. • Reinstatement and adherence to Landscape Management Plan; Incorporate land value impact considerations into compensation frameworks for each impacted household. • Monitor crop productivity and additional measures put in place if land productivity is not returning to pre-Project levels.</td>
<td>EBDR PR5 PR10 IFC PS and IFC General EHS Guidelines International best practice</td>
<td>TAP management Contractors for Plans implementation</td>
<td>Monitoring and recording of: -meeting/consultations; -signed compensation agreements</td>
<td>Before start of construction. During construction.</td>
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<tr>
<td>Community health and safety</td>
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<tr>
<td>• PR2 Labour and Working Conditions (Paragraphs 5, and 16)</td>
<td>Increased transmission of communicable diseases Increased transmission of STDs, HIV/AIDS (8.7.4.2)</td>
<td>• Implement IFC/EBRD guidelines regarding the construction and management of worker accommodation. • Training on communicable diseases and STDs Guidelines and training on worker and community interactions • Adherence to Health and Safety Management Plan</td>
<td>EBDR PR2, PR4, PR10 IFC PS and IFC General EHS Guidelines International best practice</td>
<td>TAP management Contractors for Plans implementation</td>
<td>Pre-employment screening records Health checks conducted for all workers every 6 months Training records Emergency Response Plan including local authorities and hospitals TAP Code of Conduct Voluntary STD screening Manage working hours and adopt HR practice</td>
<td>Before start of construction. During construction.</td>
</tr>
</tbody>
</table>
### Community Cohesion

| PR2 Labour and Working Conditions (Paragraph 10) | Unmet expectations for benefits, Damaged relations between local residents and workers, Strains on relationships from consultation and compensation activities (8.7.6.2) | Grievance Mechanism, Enable national enterprises to compete successfully with international companies in the tendering process, Conduct recruitment in a transparent manner to enhance understanding and awareness of Project employment needs. | EBRD PR2, PR4, PR10, IFC PS and IFC General EHS Guidelines, International best practice | TAP management | Social and Environmental Investment Strategy, CSR policy, KPIs (risk assessment) to evaluate outcomes of funds spent on investment, Meeting minutes from consultations, Quarterly project update leaflets on progress of investment plan and on livelihood restoration, Monitoring to ensure awareness of grievance submittal process, monitoring grievance trends, Meeting minutes from engagement and consultations | Prior to Social and Environmental Strategy finalization, During construction. |
| PR4 Community Health, Safety and Security | | | | | | |
| PR10 Information Disclosure and Stakeholder Engagement (Paragraphs 12, 15, 21, 24, 25) | | | | | | |

### Cultural Heritage

| PR 8 Cultural Heritage, (Paragraph 15) | Loss of scientific, cultural, or historical value due to direct physical disturbance or damage (8.8.2.1) | Avoidance of cultural heritage sites by Project activities, Fencing and/or signage around sites, Removal of resources by rescue excavations and associated studies, Use of special low impact construction techniques where complete avoidance (e.g. re-routing is not feasible.) Implementation of archaeological monitoring and a “chance finds” procedure with special focus on high potential archaeological areas, Adherence to Cultural Heritage management Plan (CHMP). | EBRD, international best practice, IFC PS 8, Adherence to CHMP; | TAP management, Contractors for Plans implementation | Monitoring by a cultural heritage specialist of use of special avoidance (e.g. re-routing) is not feasible, Implementation of archaeological monitoring and a “chance finds” procedure with special focus on high potential archaeological areas | Before start of construction, During construction. |
| PR 8 Cultural Heritage, (Paragraph 15) | Vibration and pollution, Negative effects on the setting or ambience (8.8.2.1) | Restrictions on timing and location of project activities, Periodic cleaning and conservation of eventually polluted sites, Adherence to CHMP. | EBRD, international best practice, IFC PS 8, Guidelines in the workers’ Code of Conduct. | TAP management, Contractors for Plans implementation | Project activity restrictions schedule, cultural heritage site construction restriction schedule followed 100%, Monitoring of at risk sites. The Code of Conduct document; delivery of Code of Conduct to 100% of project management and construction staff. ESMMP, Monitoring logs. | Before start of construction, During construction. |
| PR 8 Cultural Heritage, (Paragraph 15) | Blockage of user access (8.8.2.1) | Measures to be included in Environmental and Social Management and Monitoring Plan, Stakeholder engagement with local ICH (Intangible Cultural Heritage) users. | EBRD, international best practice, IFC PS 8 | TAP management, Contractors for Plans implementation | ESMMP; Response to 100% of relevant grievances | Before start of construction, During construction. |

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**Note:** This Table shows the most relevant mitigation measures identified for the Construction Phase, but does not present a comprehensive list of all recommended measures. References to the impact assessment Appendix are made when necessary, so that the reader can find the complete lists of mitigation measures for each impact.

*) Monitoring frequencies are detailed in the following Table 1-6.
### Table 9-2  Construction Phase Environmental and Social Management and Monitoring (offshore)

<table>
<thead>
<tr>
<th>EBRD PR Reference</th>
<th>Issue / Risk (ESIA Impact section reference)</th>
<th>Description of Activity / Mitigation Measures</th>
<th>Requirement: Legal and/or International Best Practice</th>
<th>Responsibility:</th>
<th>Key Performance indicator</th>
<th>Implementation Timeline*</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Offshore Physico-Biological Environment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PR3 Pollution Prevention and Abatement, (Paragraph 10)</td>
<td></td>
<td>Re-suspension and spreading of sediments and direct physical interaction, (plankton, and fish) (8.2.2.2)</td>
<td>International Best Practice</td>
<td>TAP management; Contractors for Plans implementation</td>
<td>Monitoring of soil sediment and other contaminants levels in sea water</td>
<td>Before start of construction During construction.</td>
</tr>
<tr>
<td>PR1 Environmental and Social Appraisal and Management, (Paragraphs 5 and 7)</td>
<td></td>
<td>Direct physical impact on sediments, and benthic flora and fauna (loss of seabed habitats) (8.3.4.2)</td>
<td>International Best Practice</td>
<td>TAP management; Contractors for Plans implementation</td>
<td>Monitoring of soil sediment and other contaminants levels in sea water</td>
<td>Before start of construction During construction.</td>
</tr>
<tr>
<td>PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources (Paragraphs 6,7,8)</td>
<td></td>
<td>Adherence to Project Design and Biodiversity Action Plan; Anchor spread will be managed to prevent any direct impact on Natura 2000 sites.</td>
<td>International Best Practice</td>
<td>TAP management; Contractors for Plans implementation</td>
<td>Monitoring of soil sediment and other contaminants levels in sea water</td>
<td>Before start of construction During construction.</td>
</tr>
<tr>
<td><strong>Offshore Socioeconomic and Cultural Heritage Environment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PR1 Environmental and Social Appraisal and Management, (Paragraphs 5 and 7)</td>
<td></td>
<td>Impacts to fish and other nekton, marine reptiles, and sea birds from physical, visual and noise disturbance from vessels traffic and operation (8.5.3.2)</td>
<td>International Best Practice</td>
<td>TAP management; Contractor</td>
<td>Monitoring of presence of marine fauna</td>
<td>Before start of construction During construction.</td>
</tr>
<tr>
<td>PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources (Paragraphs 6,7,8)</td>
<td></td>
<td>Marine mammals observation Marine traffic will avoid crossing Natura 2000 sites; Adherence to Biodiversity Action Plan.</td>
<td>International Best Practice</td>
<td>TAP management; Contractors for Plans implementation</td>
<td>Monitoring by a cultural heritage specialist Number of sightings and identified species</td>
<td>Before start of construction During construction.</td>
</tr>
<tr>
<td><strong>PR 8 Cultural Heritage, paragraph 15</strong></td>
<td>Loss of scientific, cultural, or historical value due to direct physical disturbance or damage (8.4.1.3)</td>
<td>Implementation of archaeological monitoring and a &quot;chance finds&quot; procedure. Removal of resources by rescue excavations and associated studies. Adherence to CHMP.</td>
<td>International Best Practice</td>
<td>TAP management; Contractors for Plans implementation</td>
<td>Monitoring by a cultural heritage specialist Implementation of archaeological monitoring and a &quot;chance finds&quot; procedure with special focus on high potential archaeological areas</td>
<td>Before start of construction During construction.</td>
</tr>
</tbody>
</table>

*Note: This Table shows the most relevant mitigation measures identified for the Construction Phase, but does not present a comprehensive list of all recommended measures. References to the impact assessment Appendix are made when necessary, so that the reader can find the complete lists of mitigation measures for each impact.

*) Monitoring frequencies are detailed in the following Table 1-6
<table>
<thead>
<tr>
<th>EBRD PR Reference</th>
<th>Issue / Risk (ESIA Impact section reference)</th>
<th>Description of Activity / Mitigation Measures</th>
<th>Requirement: Legal and/or International Best Practice</th>
<th>Responsibility: TAP management; Contractors for Plans implementation</th>
<th>Key Performance indicator</th>
<th>Implementation Timeline*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Noise</td>
<td>PR 3 Pollution Prevention and Abatement (Paragraphs 10 and 11)</td>
<td>Direct impact on human health (potential annoyance at residential buildings closest the PRT) (8.5.2.5)</td>
<td>EBBD; IFC (Environmental Health and Safety Guidelines – Paragraph 1.7); DPCM 01/03/91 (as stated in Law 447/85).</td>
<td>Noise monitoring at PRT’s boundary and at receptors</td>
<td>During design phase (choice of proper equipment during the optimization of the PRT project layout)</td>
<td>During operation phase (noise monitoring )</td>
</tr>
<tr>
<td></td>
<td>PR 4 Community Health, Safety and Security (Paragraphs 16 and 17)</td>
<td>Optimization of the project layout and machinery in use.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Soil and water</td>
<td>PR3 Pollution Prevention and Abatement (Paragraph 10)</td>
<td>Potential contamination of freshwater from fuels, lubricant oils and chemicals (8.5.3.4)</td>
<td>Waste water will not be directly discharged into water receptors</td>
<td>TAP management;</td>
<td>Monitoring water use, investigate and record water spills.</td>
<td>During design phase (choice of proper discharge/disposal procedure and methodologies)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>All liquid waste will be collected, stored and transported separately in appropriate and approved bins and containers</td>
<td>Contractors for Plans implementation</td>
<td>Periodic monitoring of application of Chemical Management Plan.</td>
<td>During operation phase (monitoring )</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Adherence to Waste Management and Pollution Prevention Plans.</td>
<td></td>
<td>Periodic monitoring</td>
<td></td>
</tr>
<tr>
<td></td>
<td>PR1 Environmental and Social Appraisal and Management (Paragraph 5)</td>
<td>Land take (8.5.4.4)</td>
<td>No machinery will be permitted to leave the access roadways or the working strip</td>
<td>International Best Practice, Guidelines of Soil Quality, Assessment in Conservation Planning (United States Department of Agriculture – 2001)</td>
<td>Monitoring monitoring at PRT’s boundary and at receptors</td>
<td>During design phase (guidelines)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>TAP management; Contractors</td>
<td>Periodic monitoring.</td>
<td>During operation phase (monitoring )</td>
</tr>
<tr>
<td>Landscape</td>
<td>PR1 Environmental and Social Appraisal and Management (Paragraph 5)</td>
<td>Introduction of new permanent structures: BVS (Kp 0.1)(8.5.5.2)</td>
<td>New mitigation planting will be introduced, if necessary, to integrate the Block Valve Station into receiving landscape.</td>
<td>TAP management</td>
<td>Establishment and growth of replacement planting.</td>
<td>During design phase (mitigation project design)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>The characterization of the proposed TAP on landscape and visual amenity will be undertaken in accordance with accepted methodologies derived from best practice guidelines.</td>
<td></td>
<td></td>
<td>During Operation Phase (monitoring). Mitigation planting could take 10 – 15 years to reach maturity.</td>
</tr>
<tr>
<td></td>
<td>PR1 Environmental and Social Appraisal and Management, (Paragraph 5)</td>
<td>Introduction of new permanent structures: PRT (Kp 8.2) (8.5.5.2)</td>
<td>Landscape Mitigation Project Design will be finalized in agreement with the local Authorities (e.g. Landscape and CH Superintendent)</td>
<td>TAP management</td>
<td>Implementation of the Landscape Mitigation Project Design</td>
<td>During design phase (mitigation project design)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>New mitigation planting will be introduced to integrate the PRT into receiving landscape. This will visually screen the facility from nearby viewers.</td>
<td></td>
<td>Establishment and growth of planting as part of the mitigation landscape design for the PRT. Monitoring implementation of mitigation measures.</td>
<td>During Operation Phase (monitoring). Mitigation planting could take 10 – 15 years to achieve a size that will provide required visual screening of PRT.</td>
</tr>
<tr>
<td>EBRD PR Reference</td>
<td>Issue / Risk (ESIA Impact section reference)</td>
<td>Description of Activity / Mitigation Measures</td>
<td>Requirement: Legal and/or International Best Practice</td>
<td>Responsibility:</td>
<td>Key Performance indicator</td>
<td>Implementation Timeline*</td>
</tr>
<tr>
<td>-------------------</td>
<td>---------------------------------------------</td>
<td>---------------------------------------------</td>
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<td>--------------------------</td>
</tr>
<tr>
<td>Land and Livelihoods</td>
<td>PR5 Land Acquisition, Involuntary Resettlement and Economic Displacement</td>
<td>Reinstatement of land to pre-Project productivity levels within 3 years after end of construction <strong>New Build &amp; Technology GmbH</strong>&lt;br&gt;- Independent Land Access and Land Rehabilitation Monitoring of crop productivity&lt;br&gt;- Additional measures put in place if land productivity is not returning to pre-Project levels</td>
<td>• EBRD PR5, PR10&lt;br&gt;• IFC PS and IFC General EHS Guidelines&lt;br&gt;• International best practice</td>
<td>TAP management</td>
<td>Land productivity is back to pre-Project levels within 3 years</td>
<td>The first 5 years after commissioning</td>
</tr>
<tr>
<td></td>
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<td></td>
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<td></td>
</tr>
<tr>
<td>Biodiversity</td>
<td>EBRD PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources (Paragraph 5)</td>
<td>Light pollution (8.6.2.3)</td>
<td>• Lighting in compliance to the Best Practices;&lt;br&gt;- Use of lights limiting the diffusion of light upwards</td>
<td>• EBRD, Italian legislation, Bern Convention&lt;br&gt;• EU Nature Legislation&lt;br&gt;• International Best Practice&lt;br&gt;• IFC PS6</td>
<td>TAP management, Contractors</td>
<td>Pre / During Operation phase Survey;&lt;br&gt;Monitoring implementation of mitigation measures.</td>
</tr>
<tr>
<td>Infrastructure and utilities</td>
<td>PR4 Community Health, Safety and Security, PR5 Land Acquisition, Involuntary Resettlement and/or Economic Displacement, PR10 Information Disclosure and Stakeholder Engagement</td>
<td>Benefits to local settlements due to infrastructure and service improvements (8.7.3.3)</td>
<td>Infrastructure improvement plan</td>
<td>• EBRD PR4, PR5, PR10&lt;br&gt;• IFC PS and IFC General EHS Guidelines&lt;br&gt;• International best practice</td>
<td>TAP management</td>
<td>Infrastructure improvement plan; signed agreements with authorities</td>
</tr>
<tr>
<td>Community health and safety</td>
<td>PR4 Community Health, Safety and Security</td>
<td>Temporary community safety risks from unauthorised activity (ground intrusion and potential interference with pipeline), gas leaks, and unplanned events (i.e. natural disaster, emergency flaring, spills/releases (8.7.4.3))</td>
<td>Promote public awareness of the pipeline and provide information to community members on prohibited or restricted activities along the pipeline route.&lt;br&gt;- Adherence to Emergency Response Plan.</td>
<td>• EBRD PR4&lt;br&gt;• IFC PS and IFC General EHS Guidelines&lt;br&gt;• International best practice</td>
<td>TAP management, Contractors for Plans implementation.</td>
<td>Monitoring implementation of mitigation measures. Monitoring of at risk sites. Periodic monitoring of application of Chemical Management Plan. Workers will be trained in Environmental Management Plan</td>
</tr>
<tr>
<td>EBRD PR Reference</td>
<td>Issue / Risk (ESIA Impact section reference)</td>
<td>Description of Activity / Mitigation Measures</td>
<td>Requirement: Legal and/or International Best Practice</td>
<td>Responsibility:</td>
<td>Key Performance indicator</td>
<td>Implementation Timeline*</td>
</tr>
<tr>
<td>------------------</td>
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<td>--------------------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>Cultural Heritage</td>
<td>PR 8 Cultural Heritage, (Paragraph 15)</td>
<td>• Vibration and pollution • Negative effects on the setting or ambience (8.8.2.2)</td>
<td>• Monitoring of at risk sites. • Structural reinforcement of sites suffering from damage from vibrations. • Measures to be included in Environmental and Social Management and Monitoring Plan. • Adherence to CHMP.</td>
<td>• EBRD, international best practice, IFC PS 8 • Guidelines in the workers’ Code of Conduct.</td>
<td>• TAP management • Contractors for Plans implementation.</td>
<td>Project activity restrictions schedule; Monitoring of at risk sites. The Code of Conduct document; delivery of Code of Conduct to 100% of project management and maintenance staff. ESMMP, Monitoring logs.</td>
</tr>
</tbody>
</table>

Note: This Table shows the most relevant mitigation measures identified for the Operation Phase, but does not present a comprehensive list of all recommended measures. References to the impact assessment Appendix are made when necessary, so that the reader can find the complete lists of mitigation measures for each impact. 

*) Monitoring frequencies are detailed in the following Table 1-7.
### Project Title:
Trans Adriatic Pipeline – TAP

### Document Title:
ESIA Italy - Section 9 Environmental and Social Management and Monitoring

### Table 9-4  Operation Phase Environmental and Social Management and Monitoring (offshore)

<table>
<thead>
<tr>
<th>EBRD PR Reference</th>
<th>Issue / Risk (ESIA Impact section reference)</th>
<th>Description of Activity / Mitigation Measures</th>
<th>Requirement: Legal and/or International Best Practice</th>
<th>Responsibility: Resources / Cost</th>
<th>Key Performance indicator</th>
<th>Implementation Timeline*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Offshore Physico-Biological Environment</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PR3 Pollution Prevention and Abatement, (Paragraph 10)</td>
<td>• Environmental stresses on sensitive areas due to potential impact from maintenance work (8.3.2.3)</td>
<td>• Adherence to Project Design and Biodiversity Action Plan.</td>
<td>• International Best Practice</td>
<td>• TAP management; Contractors for Plans implementation.</td>
<td>Monitoring of soil sediment and other contaminants levels in sea water</td>
<td>During operation phases</td>
</tr>
</tbody>
</table>
| PR1 Environmental and Social Appraisal and Management, (Paragraphs 5 and 7) | • Local disturbance of the seabed resulting in direct loss of benthic fauna and smothering due to sediment re-suspension from repair and improvement works (8.3.4.3) | | • Legal references: 
  • Water Framework Directive (WFD) 
  • Directive of Quality of Bathing (EU Directive 76/160) 
  • MARPOL Regulations 
  • Barcelona Convention | | |
| PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources (Paragraphs 6,7,8) | | | | | |

Note: This Table shows the most relevant mitigation measures identified for the Operation Phase, but does not present a comprehensive list of all recommended measures. References to the impact assessment Appendix are made when necessary, so that the reader can find the complete lists of mitigation measures for each impact.

*) Monitoring frequencies are detailed in the following Table 1-7
### Table 9-5 Decommissioning Phase Environmental and Social Management

<table>
<thead>
<tr>
<th>EBRD PR Reference</th>
<th>Issue / Risk Description of Activity / Mitigation Measures</th>
<th>Requirement: Legal and/or International Best Practice</th>
<th>Responsibility: Resources / Cost</th>
<th>Key Performance Indicator</th>
<th>Implementation Timeline*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Noise</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Refer to Construction Phase</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Biological Environment</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| EBRD PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources (Paragraph 5) | Alteration of abiotic components in ecosystems (8.6.2.4) | • Avoid alteration of abiotic components through adequate safety facilities  
• Planting trees and shrubs | • EBRD, Italian legislation, Bern Convention  
• EU Natura Legislation  
• International Best Practice  
• IFC PS6 | • TAP management  
• Contractors | • Pre / During / Post Decommissioning Survey.  
• Monitoring implementation of mitigation measures.  
• Site monitoring reports provided by appropriate landscape/ecological site supervisor during construction will verify that restricted working widths have been adhered to. | During decommissioning |
| EBRD PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources (Paragraph 5) | Increasing collision rate from traffic (8.6.2.4) | • Speed limits;  
• Measures to prohibit “off-route” driving;  
• Drivers will be trained on the traffic Management Plan. | • EBRD, Italian legislation, Bern Convention  
• EU Natura Legislation  
• International Best Practice  
• IFC PS6 | • TAP management  
• Contractors | • Pre / During / Post Decommissioning Survey.  
• Monitoring implementation of mitigation measures. | During decommissioning |
| EBRD PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources (Paragraph 5) | Light pollution (8.6.2.4) | • Lighting in compliance to the best practices;  
• Use of lights limiting the diffusion of light upwards | • EBRD, Italian legislation, Bern Convention  
• EU Natura Legislation  
• International Best Practice  
• IFC PS6 | • TAP management  
• Contractors | • Pre / During / Post Decommissioning Survey.  
• Monitoring implementation of mitigation measures. | During decommissioning |
| Economy and Employment | | | | | |
| Refer to Construction Phase | | | | | |
| • PR5 Land Acquisition, Involuntary Resettlement and Economic Displacement | Decreased land value (8.7.2.2) Building restrictions | • Monitoring  
• Engage with land owners and local administration to assure compliance with building restrictions | • EBRD PR5 PR10  
• IFC PS and IFC General EHS Guidelines  
• International best practice | • TAP management | • Monitoring and recording of meeting/consultations and signed compensation agreements | During operation |
| Community health and safety | | | | | |
| Refer to Construction Phase | | | | | |
| Community cohesion | | | | | |
| Refer to Construction Phase | | | | | |
**EBRD PR Reference** | **Issue / Risk** | **Description of Activity / Mitigation Measures** | **Requirement:** | **Responsibility:** | **Key Performance Indicator** | **Implementation Timeline**
--- | --- | --- | --- | --- | --- | ---
Cultural heritage | PR 8 Cultural Heritage, (Paragraph 15) | Loss of scientific, cultural, or historical value due to direct physical disturbance or damage (8.8.2.3) | • Avoidance of cultural heritage sites by Project design.  
• Make records of existing conditions before and after  
• Protective measures  
• Restoration  
• Guidelines in the workers’ Code of Conduct | • EBRD, international best practice, IFC PS 8  
• Guidelines in the workers’ Code of Conduct | • TAP management  
• Contractors | • Monitoring by a cultural heritage specialist. Mitigation measure and the method that works the best to reduce impact on archaeological sites.  
• Monitoring the condition of nearby sites is important for mitigating impacts before demolition activities and identifying impacts after demolition. | Before and during decommissioning

Note: This Table shows the most relevant mitigation measures identified for the Decommissioning Phase, but does not present a comprehensive list of all recommended measures. References to the impact assessment Appendix are made when necessary, so that the reader can find the complete lists of mitigation measures for each impact.  
No mitigation measures have been identified for the Decommissioning Phase, due to the decommissioning philosophy of the offshore pipeline.
9.2 Roles and Responsibilities

9.2.1 The Role of TAP AG with Respect to Environmental and Social Management

As Project proponent, TAP AG will have the ultimate accountability for the successful implementation of the management and monitoring of environmental and social issues related to the construction, operation and decommissioning of the Italy section of the Project, which will include the following activities:

- On-going management (during all phases of the project - from design, construction, operation to decommissioning) of environmental and socioeconomic issues;
- Monitoring the Contractors' performance during the construction phase;
- Development of mechanisms for dealing with/resolution of problems;
- Acting as a point of contact for consultation and feedback with landowners, the public and other interested parties.

TAP AG will develop an Environmental and Social management and Monitoring Plan (ESMMP) to address the above. In particular it will ensure that the activities of its contractors will be deployed in accordance with the relevant standards that will be outlined. Contractors' performance in complying with the ESMMP will be monitored and audited. Compliance and non-compliance with the provisions of the ESMMP will be recorded, and records will be made available for inspection by representatives of both the Contractors and Italian Authorities.

9.2.2 The Role of the Contractor(s) with Regard to Environmental and Social Management

The Contractor(s) commissioned by TAP AG (who will most likely be international Engineer, Procure, Construct (EPC) contractor(s)) will be required to comply with the provisions of the ESMMP and to take responsibility for its continual development throughout their involvement in implementation of the Project.

Contractors will be responsible for ensuring compliance with:

- All relevant legislation;
- Environmental and socioeconomic controls and mitigation measures contained in the ESMMP;
- Any environmental, socioeconomic or other codes of conduct required by TAP; and
- EBRD Performance Requirements as updated from time to time.

Contractors will also:

- Be required to undertake regular environmental and socioeconomic inspections and report directly to the Project owner TAP AG;
• Need to demonstrate how ESMMP requirements will be ensured during Project phases;

• Be expected to demonstrate commitment to the ESMMP at all levels in the Contractors' management structure including subcontractors;

• Produce a Contractor’s Environmental and Social Management Plan detailing the Contractors' procedures in terms of:
  o Contractor’s organization and person responsible for environmental and workers management issues;
  o Site Induction and Health & Safety, Environmental and Workers’ Rights, and Conditions of Work Awareness of personnel working on site, including information on the work equipment, substances to be used, personal protective equipment to be used, personnel awareness of specific plans (such as waste management) and good site practices (such as housekeeping, noise control, energy saving, labour rights, code of conduct etc.);
  o Environmental procedures;
  o Stakeholder Engagement Plan;
  o Audit procedures; and
  o Reporting procedures.

9.3 Environmental, Social and Cultural Monitoring

As the construction of the TAP Project will be carried out by external Contractors rather than TAP AG directly, it is important to understand that many of the environmental and social mitigation and management measures outlined in this ESIA will need to be delivered by the Contractors. Therefore, TAP AG will seek to ensure that the Contractors that are commissioned to carry out the activities take account of, and deliver, the mitigations outlined in this ESIA. A Commitments Register will set out who is responsible for the delivery of each of the mitigation commitments and who will check the delivery of each commitment. TAP AG will be ultimately accountable for the delivery of all commitments.

Once the construction contract has been formally awarded, TAP AG will start the process of Contractor engagement. In the first instance this will involve clarifying with the Contractor TAP AG’s expectations with regard to delivery of environmental and social mitigation and management. The principal mechanism for communicating this to the Contractor will be the ESIA Commitments Register. After contract award and during the Project lifetime, a TAP AG Environmental and Social Advisor will monitor on-going contractor performance and compliance with requirements in the Commitments Register by means of site visits and audits.
Monitoring and reporting of environmental data will be undertaken in accordance with the TAP AG Monitoring and Measurement Procedure. TAP AG will record and monitor data covering the environmental (e.g. waste generation, water use and discharges) and social aspects. This process will enable TAP AG to understand how environmental performance will change over time and will facilitate improvements to the environmental and social management system.

An outline of the monitoring programmes proposed for the construction and operation phases, is presented below in table format for both the construction phase (Table 9-6) and the operation phase (Table 9-7).

Table 9-6  Outline of Monitoring Programme: Construction Phase

<table>
<thead>
<tr>
<th>Receptor</th>
<th>Monitoring Task</th>
<th>Monitoring Parameter</th>
<th>Timing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Terrestrial Ecology</td>
<td>Inspection and audit to ensure satisfactory implementation of proposed mitigation measures</td>
<td>Terrestrial ecology inspection audits</td>
<td>Weekly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Visual monitoring of pipeline trench for trapped animals</td>
<td>Daily</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Pre / During / Post Construction Survey</td>
<td></td>
</tr>
<tr>
<td>Surface water and groundwater</td>
<td>Monitor water quality at crossing/direct interference</td>
<td>Turbidity/suspended solids</td>
<td>During crossing/direct interference</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Oil and grease</td>
<td>One week after crossing/direct interference</td>
</tr>
<tr>
<td></td>
<td>Monitor water consumption</td>
<td>Water used at work sites, during hydrotesting and any other activity</td>
<td>Continuous</td>
</tr>
<tr>
<td></td>
<td>Monitoring hydrotesting water (provided and discharged)</td>
<td>Dissolved oxygen</td>
<td>Weekly during hydrotesting</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Turbidity/suspended solids</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Oil and grease</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Identification and reporting of erosive events</td>
<td>Coliforms</td>
<td>Continuous</td>
</tr>
<tr>
<td></td>
<td>Number of erosive events caused by the project</td>
<td>Percentage of project related erosive events detected and corrected</td>
<td></td>
</tr>
<tr>
<td>Soil</td>
<td>Periodical auditing of the application of soil handling measures</td>
<td>Height of topsoil mounds</td>
<td>Weekly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Volumes of topsoil handled</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Verification of replacement procedures and restoration results</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Periodical visual inspection of works</td>
<td>Events where machinery was identified outside of designated areas (working strip, access roads, etc.)</td>
<td>Daily</td>
</tr>
<tr>
<td>Landscape</td>
<td>Site monitoring by site supervisor to verify that landscape mitigation measures have been applied</td>
<td>Working strip widths</td>
<td>Weekly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Presence of fencing for protecting vegetation (monumental olives)</td>
<td></td>
</tr>
<tr>
<td>Receptor</td>
<td>Monitoring Task</td>
<td>Monitoring Parameter</td>
<td>Timing</td>
</tr>
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</tr>
<tr>
<td>Cultural Heritage</td>
<td>Review and audit of mitigation activities to ensure satisfactory implementation of mitigation measures</td>
<td>100% completion of required reporting, including: Ground-disturbing activities, Chance finds, 100% completion of induction training and toolbox talks, 100% implementation of all additional measures, such as signage, fencing, structural bracing &amp; conservation, 100% of cultural heritage-related grievances and cultural heritage issues raised through community consultation addressed</td>
<td>Daily &amp; Weekly, Per Find, Monthly, Monthly, Monthly, Monthly</td>
</tr>
<tr>
<td>Economy and employment</td>
<td>Record economic indicators for socioeconomic issues</td>
<td>Funds spent on investment, Percentage of contractors trained on socioeconomic policies</td>
<td>Monthly</td>
</tr>
<tr>
<td>Land use and value</td>
<td>Recordkeeping: signed agreements for compensations, consultation meeting minutes</td>
<td>Percentage of land owners affected with signed compensation agreements, Percentage of meetings with minutes developed</td>
<td>Monthly</td>
</tr>
<tr>
<td>Infrastructure and Utilities</td>
<td>Recordkeeping: documented agreements with authorities and public utility companies, grievance mechanism</td>
<td>Percentage of affected entities having a signed agreement, Number of grievances responded and addressed, Hours of utility service interruptions (sewage, electricity, irrigation).</td>
<td>Monthly</td>
</tr>
<tr>
<td>Traffic monitoring</td>
<td></td>
<td>Number of vehicles per category, Number of accidents and other events</td>
<td>When construction occurs close to identified potential hot spots</td>
</tr>
<tr>
<td>Working conditions</td>
<td>H&amp;S monitoring and audits. H&amp;S performance evaluations for subcontractors PPE (Personal Protected Equipment) monitoring</td>
<td>Total recordable incidents, lost time incidents, and other H&amp;S indicators, Records verifying the conditions of PPE, Health checks parameters</td>
<td>Weekly H&amp;S audits</td>
</tr>
<tr>
<td>Perform workforce surveys</td>
<td>Maintain grievance mechanism</td>
<td>Workforce surveys results, KPIs for worker rights, discrimination, worker grievances, Community and workers grievance trends, Training records (compliance with assigned training)</td>
<td>Monthly</td>
</tr>
<tr>
<td>Maintain training records</td>
<td></td>
<td>Number of times where TAP Code of Conduct was breached</td>
<td></td>
</tr>
<tr>
<td>Receptor</td>
<td>Monitoring Task</td>
<td>Monitoring Parameter</td>
<td>Timing</td>
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</tr>
<tr>
<td>Community health and safety</td>
<td>Monitor workers’ health</td>
<td>Monitoring and audits reports</td>
<td>Monthly</td>
</tr>
<tr>
<td></td>
<td>Recordkeeping: social application of training</td>
<td>Pre-employment screening records</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Health checks conducted for all workers every 6 months</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Training records</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Records on medical facilities and first aid equipment conditions</td>
<td>Monthly</td>
</tr>
<tr>
<td>Community cohesion</td>
<td>Recordkeeping: social investment figures</td>
<td>KPIs to evaluate outcomes of investments, and funds spent on investment</td>
<td>Monthly</td>
</tr>
<tr>
<td></td>
<td>Recordkeeping of traffic related parameters</td>
<td>Percentage of meetings with minutes developed</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Percentage of quarterly project update leaflets on progress of investment plan and on livelihood restoration achieved</td>
<td></td>
</tr>
<tr>
<td>Traffic</td>
<td>Monitoring potential impacts related to traffic</td>
<td>Percentage of total new and updated roads constructed, compared to originally planned</td>
<td>Monthly</td>
</tr>
<tr>
<td></td>
<td>Recordkeeping of traffic related parameters</td>
<td>Number of days and kilometres of roads affected by the project (closed due to project’s activities)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Reports and records showing application of mitigation measures (communications, records of road damage and repair, approval of road drawings, training registers)</td>
<td></td>
</tr>
<tr>
<td>Air</td>
<td>Monitor air quality during construction (PRT and coastline)</td>
<td>Dust concentration</td>
<td>Continuous for 1 month per season</td>
</tr>
<tr>
<td>Noise (Hydrotesting)</td>
<td>Monitor noise during construction</td>
<td>Noise</td>
<td>During hydrotesting activities</td>
</tr>
<tr>
<td>Offshore</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Marine environment</td>
<td>Monitoring marine water quality during nearshore construction</td>
<td>Turbidity/suspended solids</td>
<td>Hourly during dredging and backfilling</td>
</tr>
<tr>
<td></td>
<td>Monitor hydrotesting water quality</td>
<td>Oil and grease</td>
<td>Daily during pipe installation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Dissolved metals</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Marine Fauna</td>
<td>Monitor presence of sensitive fauna</td>
<td>Presence of marine mammals, birds &amp; reptiles</td>
<td>Continuous during offshore activities</td>
</tr>
<tr>
<td>Marine CH</td>
<td>Monitor appearance of CH resources in the nearshore</td>
<td>Presence of CH resources in the nearshore</td>
<td>Continuous during dredging activities</td>
</tr>
<tr>
<td>Cultural Heritage (Coastal Strip)</td>
<td>Monitor appearance of CH resources in the coastal strip</td>
<td>Presence of CH resources in the coastal strip</td>
<td>Continuous during land excavation activities</td>
</tr>
<tr>
<td>Noise (Coastal Strip)</td>
<td>Monitor noise during construction and pipe drying</td>
<td>Noise</td>
<td>Weekly</td>
</tr>
<tr>
<td>Receptor</td>
<td>Monitoring Task</td>
<td>Monitoring Parameter</td>
<td>Timing</td>
</tr>
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<td>-------------------------------------------------------------------------</td>
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<td>-------------------</td>
</tr>
<tr>
<td>Infrastructure, Utilities, Tourism (Coastal Strip)</td>
<td>Grievance mechanism</td>
<td>Number of grievances responded to and addressed.</td>
<td>Monthly</td>
</tr>
<tr>
<td></td>
<td>Traffic monitoring</td>
<td>Number of accidents and other events</td>
<td>Weekly</td>
</tr>
<tr>
<td>Working conditions (Marine and Working Strip)</td>
<td>H&amp;S monitoring and audits, H&amp;S performance evaluations for subcontractors, PPE monitoring</td>
<td>Total recordable incidents, lost time incidents, and other H&amp;S indicators, Records verifying the conditions of PPE, Health checks parameters</td>
<td>Weekly H&amp;S audits</td>
</tr>
<tr>
<td></td>
<td>Perform workforce surveys, Maintain grievance mechanism, Analyse workers and community grievance trends, Maintain training records</td>
<td>Workforce surveys results, KPIs for worker rights, discrimination, worker grievances, Community and workers grievance trends, Training records (compliance with assigned training), Number of times where TAP Code of Conduct was breached</td>
<td>Monthly</td>
</tr>
</tbody>
</table>
### Table 9-7 Outline of Monitoring Programme: Operation Phase

<table>
<thead>
<tr>
<th>Receptor</th>
<th>Monitoring Task</th>
<th>Monitoring Parameter</th>
<th>Timing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality</td>
<td>PRT Air emissions monitoring through a CEM System to monitor the emission sources (stacks).</td>
<td>Temperature, Exit flow rate, CO, NOx, %O₂</td>
<td>Continuous</td>
</tr>
<tr>
<td>Noise</td>
<td>Noise monitoring at PRT boundary and at receptors during a period of 1-2 years to ensure no impact</td>
<td>Day and night time noise levels</td>
<td>Quarterly for the first 2 years of operation</td>
</tr>
<tr>
<td>Land productivity</td>
<td>Measure land productivity in construction corridor against pre-Project levels Compliance with building restrictions</td>
<td>Output per m²</td>
<td>No residential building in 40 m corridor</td>
</tr>
<tr>
<td>Cultural Heritage</td>
<td>Review and audit of mitigation activities to ensure satisfactory implementation of mitigation measures</td>
<td>100% completion of required reporting, including: Periodic inspection of known archaeological sites in the Project area Monitoring of any intrusive maintenance</td>
<td>Bi-annually Per intrusive maintenance</td>
</tr>
<tr>
<td>Marine environment</td>
<td>Integrity of the pipelines, unforeseen changes in seabed conditions, changes in benthic community structure</td>
<td>Bathymetry &amp; Seabed Morphology, Grain size, Metals, Benthic fauna</td>
<td>Immediately after and one year after construction</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Visual inspection via ROV survey, Benthic fauna</td>
<td>Visual inspection every 3 years</td>
</tr>
</tbody>
</table>

### Table 9-8 Outline of Monitoring Programme: Decommissioning Phase

<table>
<thead>
<tr>
<th>Receptor</th>
<th>Monitoring Task</th>
<th>Monitoring Parameter</th>
<th>Timing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Terrestrial Ecology</td>
<td>Inspection and audit to ensure satisfactory implementation of proposed mitigation measures</td>
<td>Terrestrial ecology inspection audits, Pre / During / Post Decommissioning Survey</td>
<td>Weekly Daily Before, during and after decommissioning</td>
</tr>
<tr>
<td>Surface water and groundwater</td>
<td>Monitor water quality at direct interference</td>
<td>Turbidity/suspended solids, Oil and grease</td>
<td>During direct interference One week after direct interference</td>
</tr>
<tr>
<td>Receptor</td>
<td>Monitoring Task</td>
<td>Monitoring Parameter</td>
<td>Timing</td>
</tr>
<tr>
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<td>--------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td></td>
<td>Monitor water consumption</td>
<td>Water used at work sites</td>
<td>Continuous</td>
</tr>
<tr>
<td></td>
<td>Identification and reporting of erosive events</td>
<td>Number of erosive events caused by the activities</td>
<td>Continuous</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Percentage of project related erosive events detected and corrected</td>
<td></td>
</tr>
<tr>
<td>Soil</td>
<td>Periodical auditing of the application of soil handling measures</td>
<td>Height of topsoil mounds</td>
<td>Weekly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Volumes of topsoil handled</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Verification of replacement procedures and restoration results</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Periodical visual inspection of works</td>
<td>Events where machinery was identified outside of designated areas (working strip, access roads, etc.)</td>
<td>Daily</td>
</tr>
<tr>
<td>Landscape</td>
<td>Site monitoring by site supervisor to verify that landscape mitigation measures have been applied</td>
<td>Working strip widths</td>
<td>Weekly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Presence of fencing for protecting vegetation (olive trees)</td>
<td></td>
</tr>
<tr>
<td>Land access</td>
<td>Audit to verify that all TAP related land use restrictions incl. building restrictions are deleted from relevant parcels</td>
<td>Cadastral data</td>
<td>3 months before the end of decommissioning</td>
</tr>
<tr>
<td>Cultural Heritage</td>
<td>Review and audit of mitigation activities to ensure satisfactory implementation of mitigation measures</td>
<td>100% completion of required reporting, including:</td>
<td>Daily &amp; Weekly Monthly Monthly Monthly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ground-disturbing activities</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Periodic inspection of known archaeological sites in the Project area</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>100% completion of workers induction training and toolbox talks</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>100% of cultural heritage-related grievances and cultural heritage issues raised through community consultation addressed</td>
<td></td>
</tr>
<tr>
<td>Economy and employment</td>
<td>Record economic indicators for socioeconomic issues</td>
<td>Percentage of contractors trained on socioeconomic policies</td>
<td>Monthly</td>
</tr>
<tr>
<td>Infrastructure and Utilities</td>
<td>Traffic monitoring</td>
<td>Number of vehicles per category</td>
<td>When decommissioning occurs close to identified potential hot spots</td>
</tr>
<tr>
<td>Receptor</td>
<td>Monitoring Task</td>
<td>Monitoring Parameter</td>
<td>Timing</td>
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</tr>
<tr>
<td>Working conditions</td>
<td>H&amp;S monitoring and audits.</td>
<td>Total recordable incidents, lost time incidents, and other H&amp;S indicators</td>
<td>Weekly H&amp;S audits</td>
</tr>
<tr>
<td></td>
<td>H&amp;S performance evaluations for subcontractors</td>
<td>Records verifying the conditions of PPE</td>
<td></td>
</tr>
<tr>
<td></td>
<td>PPE (Personal Protected Equipment) monitoring</td>
<td>Health checks parameters</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Perform workforce surveys</td>
<td>Workforce surveys results</td>
<td>Monthly</td>
</tr>
<tr>
<td></td>
<td>Maintain grievance mechanism</td>
<td>KPIs for worker rights, discrimination, worker grievances</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Analyse workers and community grievance trends</td>
<td>Community and workers grievance trends</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Maintain training records</td>
<td>Training records (compliance with assigned training)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Number of times where TAP Code of Conduct was breached</td>
<td></td>
</tr>
<tr>
<td>Community health and safety</td>
<td>Monitor workers’ health</td>
<td>Monitoring and audits reports</td>
<td>Monthly</td>
</tr>
<tr>
<td></td>
<td>Monitor application of training</td>
<td>Pre-employment screening records</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Health checks conducted for all workers every 6 months</td>
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<td></td>
<td></td>
<td>Training records</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Records on medical facilities and first aid equipment conditions</td>
<td></td>
</tr>
<tr>
<td>Traffic</td>
<td>Monitoring potential impacts related to traffic</td>
<td>Number of days and kilometres of roads affected by the project (closed due to</td>
<td>Monthly</td>
</tr>
<tr>
<td></td>
<td>Recordkeeping of traffic related parameters</td>
<td>project’s activities)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Reports and records showing application of mitigation measures (communications,</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>records of road damage and repair, training registers)</td>
<td></td>
</tr>
<tr>
<td>Air</td>
<td>Monitor air quality during decommissioning (PRT)</td>
<td>Dust concentration</td>
<td>Continuous for 1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>month per season</td>
</tr>
<tr>
<td>Noise</td>
<td>Monitor noise during decommissioning</td>
<td>Noise</td>
<td>Quarterly</td>
</tr>
</tbody>
</table>
9.4 Issue-Specific Management Plans

9.4.1 Introduction

The above Project ESMMP with action items and measures presented therein refers to a number of topic-specific plans that will need to be developed by TAP AG, its planners and contractors to address in detail key areas of potential environmental and socioeconomic impacts and risks.

Additional subsidiary or sub plans may be introduced as the Project advances to aid in managing any newly identified impacts or sensitive receptors or changes that may occur in the course of Project implementation.

Preliminary details on these plans are provided below. These plans will need to be updated by TAP AG and its contractors as more information will become available and the Project will progress.

The following list presents the specific management plans foreseen for construction and operation, based on the outcomes of the impact assessment and TAP AG’s policies.

**Table 9-9 Specific Management Plans**

<table>
<thead>
<tr>
<th>Document</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste Management Plan</td>
</tr>
<tr>
<td>Soil Management Plan</td>
</tr>
<tr>
<td>Emergency Response Plan</td>
</tr>
<tr>
<td>Water Management Plan</td>
</tr>
<tr>
<td>Traffic Management Plan</td>
</tr>
<tr>
<td>Cultural Heritage Management Plan</td>
</tr>
<tr>
<td>Pollution Prevention Plan</td>
</tr>
<tr>
<td>Chemical Management Plan</td>
</tr>
<tr>
<td>Health and Safety Management Plan</td>
</tr>
<tr>
<td>Stakeholder Engagement Plan</td>
</tr>
<tr>
<td>Livelihoods Restoration Plan</td>
</tr>
<tr>
<td>Social and Environmental Investment Plan</td>
</tr>
<tr>
<td>Local Content Development Plan</td>
</tr>
<tr>
<td>Workers Management Plan</td>
</tr>
<tr>
<td>Infrastructure and Utilities Management Plan</td>
</tr>
<tr>
<td>Community Health Management Plan</td>
</tr>
<tr>
<td>Biodiversity Action Plan</td>
</tr>
<tr>
<td>Landscape Management Plan</td>
</tr>
</tbody>
</table>

*Source: ERM (2011)*
9.4.2 Waste Management Plan

9.4.2.1 Onshore

This plan is developed to avoid solid and liquid waste discharges onto the soil or water. It establishes procedures for waste storage, collection and disposal, including liquid and solid waste and hazardous and non-hazardous waste.

The Waste Management Plan provides:

- A framework for compliance with Italian waste policy; and
- An outline waste characteristics and sufficient capacity for managing waste: waste streams and quantities to be managed.

The Waste Management Plan will be developed following TAP AG policies and will consider all the relevant EBRD PRs.

Furthermore, it contributes to ensuring that the capacity and the nature of collection and treatment systems are in line with the waste to be managed.

The overall objective is to minimise impact of waste generated during the construction phase through the following:

- Minimise the amount of waste that is generated;
- Maximise the amount of waste that is recovered for recycling – including segregation of recyclable wastes at source;
- Minimise the amount of waste that is deposited at landfill;
- Ensure any hazardous wastes (e.g. used oils, lead-acid batteries) are securely stored and transferred to appropriate facilities;
- Avoid dust impacts from handling of construction wastes;
- Ensure all wastes are properly contained, labelled and disposed of in accordance with local regulations; and
- Ensure waste is disposed of in accordance with the waste management hierarchy.

The Waste Management Plan will clearly distinguish between the construction, operation and decommissioning phases.

The following items constitute the Waste Management Plan, based on international best practices in waste management, and in compliance with EU directive and the Italian legislation.
Waste minimization principles: the inventory management systems will be updated to identify the consumption of products, ensuring waste’s traceability, and identifying potential wastage and overconsumption. An inventory of all waste generated and disposed of will be retained (type and volume) and TAP will develop goals for reducing the quantities of waste generated, based on periodic review of the inventory.

Separation of solid waste according to established classification: waste generated during construction is likely to be classified into four categories for disposal: inert (soil, building rubble, unused construction material, etc.), domestic, oily & hazardous, and liquid. Containers/skips will be associated to waste types (cardboard, plastic, metal scrap, oily, hazardous if any, etc.), in order to permit the separation/segregation. Different types of waste will be separated by campsite staff, and staff dealing with wastes will be trained. Handling of waste on-site and in construction sites will be instructed through “procedures.” Service companies will go through a qualification process and will be audited during the service period.

Solid waste storage: a daily waste storage area for containers/skips will be located at the construction site. At the end of the working day, waste in skips will be transported to the campsite, and stored. Storage will be located in the construction site, partly roofed. Waste skips for oily wastes or other hazardous wastes will be waterproof. Procedures for filling fuel tanks of machines and handling of hazardous wastes/materials will be established prior to the start of construction.

Waste reuse/recycle opportunities: different types of waste will be separated according to local regulations and the recycling materials that are dealt with in Italy. Recycling materials will be regularly collected to be recycled by certified and authorised local companies. Most of the excavated soil will be used to backfill the trenches. Excess inert soil will likely be spread out and contoured along the route. Bentonite from microtunneling waste will be regenerated until the end of its usable life on the Project and then disposed of appropriately as per below.

Waste transfer: waste transfer will be assumed by certified companies; vehicles will be fully equipped, considering the type of waste transported. No exporting of waste is anticipated.
Final disposal of waste: only companies certified and authorised will be used for waste disposal, which identifies that it will be possible to manage and dispose of all the likely construction and operation waste streams at facilities within Italy. The inert waste, which poses no risk of pollution, will be disposed of at a controlled disposal site. Domestic waste will be transported to a controlled municipal waste disposal site. Oily and hazardous wastes will be disposed by specialist contractors at sites that are equipped and approved for such wastes. Domestic liquid waste will be collected by specific sewer on the PRT, and discharged to existing wastewater treatment units by connecting to the public sewer. Specificities of hazardous waste management: in order to provide protection for the environment and human health, collection, transport and storage of hazardous waste will include action to ensure traceability from production area (mainly on construction site) to final disposal site. The transport of hazardous waste shall only be undertaken in vehicles that 1) are suitably equipped for the type and quantity of hazardous waste to be transported, 2) are of a roadworthy standard and 3) were previously registered for this purpose with the relevant authorities.

Waste recording process: all waste will be registered after every phase of this management plan: separation/segregation, storage, transfer and reception to the disposal. This inventory will allow traceability to be ensured, particularly for the hazardous waste. Optimization of waste management is a continuous process, and this plan will be periodically reviewed throughout the construction phase.

Finally, the plan will include provisions for the training of all workers on how to use the Waste Management Plan, and will include procedures related to communication to stakeholders and community improvement opportunities.

9.4.2.2 Offshore

The offshore section of the TAP Project will comply with applicable International Conventions for the Prevention of Pollution from Ships (MARPOL).

9.4.3 Soil Management Plan

The Soil Management Plan describes how excavated soils and rocks resulting from the execution of the project presented by TAP will be managed.

With regard to the requirements for excavated soils and rocks, their management is to be ensured in accordance with Art. 186 of Legislative Decree No. 152/2006 and its subsequent amendments and with the Regulations concerning the management of soils and rocks resulting from excavation activities, earthworks and processing of inert material, as published in the «Official Bulletin» of Apulia’s Regional Government, No. 44, dated 28 March 2011.

The Proponent of the planned work is required to develop a project that will be approved by the authority in charge of the procedure.
In this specific case, since the work is subject to an Environmental Impact Assessment (EIA) procedure, the Project, including all information, will be assessed by the Authorities within the EIA procedure.

The Soil Management Plan describes the excavation activity and handled materials during the onshore and offshore works. Part of the material produced during the completion of the gas pipeline will be relocated to backfill and close the excavation. In particular this Plan analyses the volume of material handled. The volumes are divided in sub-phases (pipeline burial, landfall microtunneling, pre dredging, laying of pipeline on seabed).

The Soil Management Plan will address

- The management of excavated soils and rocks and marine sediments;
- The origin of purchased materials;
- The methodology of storage of excavated materials;
- The disposal of waste soils.

Excavated soils and rocks to be sent for disposal will be managed in accordance with Legislative Decree No. 152/06 and its amendments. The following information will be specifically reported and submitted to the competent authorities:

- CER codes identifying the nature of the materials that are sent for disposal;
- References to law requirements for outsourced approved disposal facilities where soil will be allocated;
- References to companies specialising in completing transportation of soils from construction sites to disposal facilities.

Following weighing operations, all necessary documents for disposal will be duly filled out and the Waste Loading/Unloading Register will be updated accordingly. Furthermore, a Waste Identification Form will be filled out, whereby the place of origin, including producer’s information, and place of destination (date, departure and arrival time of the vehicle to the quarry) will be indicated, as well as the quality and quantity of materials, namely in cubic metres (volume) at the place of origin, and in weight once materials have reached their destination.
9.4.4 Emergency Response Plan

The Emergency Response Plan (ERP) assembles and describes in one document the site-specific actions to be taken, and procedures followed, in emergency situations occurring during operations associated with all phases of the Project.

The objective of the ERP is to be prepared to respond to process upset, accidental, and emergency situations in a manner appropriate to the operational risks, and to prevent their potential negative consequences. TAP will apply the requirements reported in the EBRD Policy (paragraphs 18–22 of PR 4) to identify major-accident hazards, prevent major accidents, and limit their consequences for humans and the environment, with a view to ensuring high levels of protection in a consistent and effective manner.

The ERP will clearly make a distinction between all the project phases, since the actions to be undertaken will be different during the construction, operation, and decommissioning phases. The ERP will consider both onshore and offshore accident scenarios.

The content of the ERP can be summarised as follows:

- Italian legal provisions on civil emergencies;
- The identification of the potential hazards (i.e. natural disasters, civil disturbances, malfunctioning of the devices during the processes, pressure issues, etc.) related with natural gas pipeline (and associated infrastructure) installation and operation, and the possible impact to the environment and health;
- Identification of the governmental authorities, the media and other relevant stakeholders to be notified, and description of the procedures for communicating with them;
- The necessary measures to limit human and environmental consequences associated with pipeline accidents; cooperation between TAP AG, local and central authorities, and the communities, (as described in the law on civil emergencies) as well as the measures being based on the best international practices;
- Safety technical measures to be described and appropriate measures to protect the public safety or property from potential hazards; lessons learned approaches to pipeline accidents;
- Preliminary description of the organization structure, and interactions with project and operational procedures;
- Preliminary identification of the system and procedures for providing personnel refuge, evacuation, rescue, medical treatment and repatriation; and
- Preliminary description of training activities and the arrangement for training response teams and for testing emergency systems and procedures.
The onshore element of the ERP for the construction phase will include the typical hazards associated with construction activities, including microtunneling. Typical hazards associated with gas pipelines that will be covered in the ERP will include, but are not limited to, the following:

- Under pressure in the gas system;
- 3rd party interaction;
- Any leak considered hazardous;
- Danger to major segment(s) of the system;
- Natural disasters (floods, tornadoes, hurricanes, earthquakes, etc.); and
- Civil disturbances (riots, etc.).

Finally, the plan will include provisions for the training of all workers on the Emergency Response procedures, and will include procedures related to communication to stakeholders, and community improvement opportunities.

With regard to the offshore element of the ERP, each vessel will need to have an individual shipboard marine pollution emergency plan (vessel oil spill contingency plan), but the Project will also need to implement an all-encompassing Pollution Prevention Plan, including potential spills to the marine environment originated in land based activities, which will coordinate any and all the activities which could derive from an oil spill to the sea.

9.4.5 Water Management Plan

The Water Management Plan will have the following objectives:

- Monitor water use: the Plan will set procedures for estimating water used by the project, identifying activities that use this resource, and following a reporting procedure for registering volumes of water used.
- Minimise water use: the Plan will provide a series of measures to be considered for minimising the use of water.
- Log suppliers: the supply, the volume and the type of water provided will be identified and registered in the Plan.

The Water Management Plan will be developed following TAP AG policies and will consider all the relevant EBRD PRs.
9.4.6 Traffic Management Plan

9.4.6.1 Onshore

A Traffic Management Plan (TMP) will be developed to manage construction traffic generated by the project, minimise traffic disruption and road user delay and provide for the on-going safety of road users, including pedestrians and cyclists. All of the traffic related impacts described previously can be mitigated very effectively by the implementation of standard best practices in terms of environmental controls and management practices during construction. These measures will be detailed in the TMP, which will describe in detail the measures that the Contractor will implement during the construction of the project.

The key issues addressed by the TMP in terms of mitigation measures include:

- Access to construction areas;
- Routing of construction traffic;
- Prevention of road user delays;
- Temporary traffic control and management;
- Reducing the probability of traffic accidents and improving safety for road users and others; and
- Road crossings.

The Contractor shall regularly update their TMP as the construction method is developed and vehicle movement requirements are identified in detail. The Contractor shall consult with the relevant government agencies to identify where project plans can complement existing road development plans at the district and provincial level. The Contractor will also consult with the principal representative of any communities that will suffer a significant increase in traffic in order to develop awareness of the mitigation measures within the TMP.

A TMP is important for ensuring the safety of both construction personnel and local communities.

The TMP will include the following minimum requirements:

- Levels of development related construction traffic that will use the local road network;
- Site access arrangements to the working corridor and within the working corridor;
- Identification of key sensitivities along proposed access routes;
- Identification, demarcation and construction of all access routes.
- Measures to minimise disruption during the construction of new or altered road infrastructure (e.g. timing, one lane working, signage, diversions and advertise advance warning of diversions);
• Measures to provide for the on-going safety of road users, including pedestrians and cyclists;

• Project driver training requirements with respect to road safety and environment;

• Project Schedule;

• Roles and responsibilities for implementation of the TMP;

• Measures to prohibit “off-route” driving;

• Measures to minimize dust emission from the construction areas and public roads (e.g. unpaved road watering, wheel washing, etc.)

• Speed limits and methods of enforcement;

• Means to inform the community of traffic risks;

• Vehicle equipment;

• Vehicle maintenance and refuelling locations;

• Inspection, auditing and reporting; and

• Driver competency.

To achieve the minimum requirements of the TMP the Contractor will:

• Assign heavy vehicle construction traffic to suitable routes to and from the working area;

• Control and supervise the arrival and departure of construction traffic at site entrances;

• Identify those responsible for carrying out and managing the procedures;

• Identify the programme of road restoration measures that are likely to be required post construction;

• Address how the Contractor can reduce the exposure of vehicle drivers, their passengers and other road users to the hazards of road-related accidents;

• Restrictions on construction traffic movements during periods of heavy traffic on the road network, if necessary;

• Define the appropriate routes to be used by vehicles delivering ‘abnormal loads’ (i.e. slow moving, very high, heavy or wide loads) and their timing in conjunction with the highway authority (and the Police);

• Provide advanced warnings of the routes and times of abnormal load deliveries.

• Temporary road closures (during works for new or altered roads) will be scheduled, as far as is practical, during times which will minimise disruption to road users;
Advanced warning of the proposed temporary road closures and diversions will be provided to the public (e.g. suitable signage);

All Project vehicles will be regularly maintained and drivers will be trained in driving methods designed to avoid unnecessary emissions (e.g., switching engines off when waiting to enter site or stationary on site, avoiding engine stress and reducing vehicle speed in and near communities);

Drivers of Project vehicles will be trained/briefed about safe driving with respect to other drivers, pedestrians and cyclists;

Project vehicles to be identifiable to the project (e.g. an easy to read/see sign or symbol on vehicles which shows that they are connected to the TAP Project); and

The contractor selected by TAP AG will be required to undertake regular inspections to ensure adherence to the Traffic Management Plan.

The Traffic Management Plan will be developed following TAP AG policies and will consider all the relevant EBRD PRs.

The plan will include provisions for the training of all workers and will include procedures related to communication to stakeholders and community improvement opportunities.

9.4.6.2 Offshore

In view of the number of vessels that will be used during pipeline construction, including the pipe laying vessel and support vessels, an Offshore Traffic Management Plan will be developed in compliance with specific standards, best practices and national and international marine traffic regulations, International Regulations for Preventing Collisions at Sea 1972 (COLREGS).

The COLREGs include 38 rules divided into five sections: Part A - General; Part B - Steering and Sailing; Part C - Lights and Shapes; Part D - Sound and Light signals; and Part E - Exemptions. There are also four Annexes containing technical requirements concerning lights and shapes and their positioning; sound signalling appliances; additional signals for fishing vessels when operating in close proximity, and international distress signals.

9.4.7 Cultural Heritage Management and Monitoring Plan

9.4.7.1 Onshore

The Cultural Heritage Management and Monitoring Plan will have the objective of avoiding potential damage to cultural resources. The Plan will be developed following TAP AG policies and will consider all the relevant EBRD PRs. The Plan will include:

• Summary of applicable legislation, including Italian legislation, International legislation, the ESIA Commitments, and TAP’s Policy;

• Location/description of Known Cultural Heritage, presenting all resources identified;
• Protection of Known Cultural Heritage, including the recommendations and management measures described below;

• Verification and Monitoring, including procedures for the identification of additional resources not initially identified;

• Roles and responsibilities.

Avoidance of cultural heritage resources is the preferred mitigation method. Marking and protection of cultural heritage sites with temporary barriers such as a bright coloured plastic or mesh wire fence with highly visible flagging or tape is recommended. Marking of areas of high archaeological potential for avoidance in wet conditions is also recommended.

Management of cultural heritage resources will include the following:

• Italian authority engagement strategy to: 1) further evaluation of sites and the use of intrusive and non-intrusive methods, 2) development of a chance finds procedure, 3) developing site-specific mitigation approaches for any archaeological sites found, and 4) archaeological rescue.

• Community consultation strategy to: 1) inform local stakeholders of Project activities, 2) understand site boundaries, user access, timing of use, and schedule of special events, 3) consider relocation of unavoidable evidences with cultural heritage value, 4) provide feedback to Project about community concerns, 5) plan alternative access if necessary, and 6) develop site-specific mitigation approaches.

• Structural recording and monitoring program, including: 1) pre-construction survey and recording of the condition and structural integrity of sites with above-ground components that lie within 50 m of the Project footprint, 2) follow-up protection or architectural reinforcement at sites found to be at risk from pollution or vibration, 3) Vibration-minimising techniques and low impact construction techniques implemented along roads near sites at risk from vibration, 4) pre-construction preparation of conservators in the event of damage, 5) periodic monitoring of site conditions throughout the life of the Project.

• Project activity timing restrictions in the following situations: 1) in very wet conditions over areas of high archaeological potential or near sites sensitive to vibration, 2) following a chance find.

• Chance Finds Procedures to be implemented at construction fronts. This includes: 1) arrangement of on-call archaeologists prior to contract to handle an archaeological rescue if required at a chance find, 2) monitoring of construction activities by a professional archaeologist, 3) cessation of work in the vicinity of any new archaeological discovery, and 4) consultation with relevant authorities.
Finally, it is recommended that a plan for alternative access and public notification of temporary blockage is developed, together with noise and vibration monitoring at cultural heritage sites that receive visitors.

The plan will include provisions for the training of all workers and will include procedures related to communication to stakeholders and community improvement opportunities.

9.4.7.2 Offshore

With regard to potential offshore cultural heritage resources, an offshore recording and monitoring programme will be developed including pre-construction survey within the detailed route survey, using Side Scan Sonar, magnetometer and video recordings and re-routing when appropriate. A Chance Finds Procedures for offshore cultural heritage resources will also be developed. This will include: 1) inclusion of professional archaeologist on board dredging vessels to monitor construction activities and handle an archaeological rescue if required at a chance find, 2) temporary suspension of work if the characteristics of the find require it, and 3) consultation with relevant authorities.

9.4.8 Pollution Prevention Plan

The Pollution Prevention Plan will include the six key elements detailed below.

- General measures to be followed on site during the construction phase. General measures will include housekeeping, good material handling practices, and inspection procedures.

- Prevention of Accidental Spills will be achieved through the application of a series of actions and measures to prevent leakages and spills and to enable effective response to unplanned releases of liquids, such as fuels, oils, and chemicals.

- Product Specific Practices will be adopted for the following:
  - Petroleum products: vehicles and construction equipment will be monitored for leaks and receive regular preventive maintenance to reduce the potential for leakage. Petroleum products will be stored in tightly sealed containers that are clearly labelled;
  - Fertilizers: during revegetation works they will be applied in the minimum amounts recommended by the manufacturers. The contents of any partially used bags of fertilizer will be transferred to a sealable plastic bin to avoid spills;
  - Paints: containers will be tightly sealed and properly stored when not required for use. Excess paint will not be discharged to the storm sewer system but will be properly disposed of according to manufacturer’s instructions.
- Isolation of Potentially Hazardous Materials: A supply of drums will be available for use in the event of spills or if potentially hazardous materials are found during project construction. The contaminated material will be placed in the drums, sealed and placed in the storage area to await proper characterization and disposal. In the event that a larger amount of material needs to be isolated, it will be placed directly into a lined roll-off container from a licensed hazardous waste transporter. The roll-off container will be placed out of the flow of construction traffic and equipment, in an equipped area in order to prevent leaks and to isolate possible rainwater.

- Product Substitution: a policy of using environmental friendly products will be adopted. In particular, when feasible, non-chlorinated solvents, low-VOC (Volatile Organic Compounds) paints, and non lead-based paints will be used. Organic biocides will replace chlorine in cooling water systems, if feasible, and assessment will be developed to determine the availability of less harmful substances.

- Prohibited Materials: The following materials or chemicals are prohibited from purchase due to their extreme hazardous or toxic nature: PCBs, leaded paints, chromium-based cooling water treatment and mercury-filled meters.

The plan will be developed following TAP AG policies and will consider all the relevant EBRD PRs; include provisions for training all workers; and include procedures related to communication to stakeholders and community improvement opportunities.

9.4.9 Chemical Management Plan

Chemical substances will be needed for several different activities in the TAP Project. Many of these chemical substances are not harmful to the environment or to human health. However, some have the potential to cause harm, in certain doses, and should only be used when the risks are appropriately managed. The purpose of a Chemical Management Plan is to define how TAP and contractors will select, handle, store and dispose of the chemicals in order to prevent damage to people and the environment.

The Plan will be developed following TAP AG policies and will consider all the relevant EBRD PRs.

- All TAP AG employees and contractors are responsible for handling chemicals in an appropriate way;
- Chemical selection will be subject to a risk assessment to define hazards, mitigate potential risks and select the one with the least damaging/persistent properties;
- All chemicals will be tracked and inventoried through storage, use and final disposal;
- Chemical Waste: specific measures are provided for hazardous waste containers (in the Waste Management Plan);
• All personnel shall be trained, and personnel who are potentially exposed to hazardous chemicals must undergo a special chemical management training;

• Chemicals will be stored in secure areas;

• Spill control procedures will be prepared and personnel trained;

• Chemicals will be stored and handled as per the requirements of international standards;

• Chemicals will be stored in bounded areas away from watercourses;

• Material safety data sheets for chemicals will be available on site;

• Absorbent and containment material will be available where hazardous materials are used and stored, and personnel trained in their correct use;

• Protective clothing, appropriate to the materials in use, will be provided; and

• Regular inspections will be made to ensure that chemical storage facilities continue to meet Chemical Management Plan.

The plan will include procedures related to communication to stakeholders and community improvement opportunities.

9.4.10 Health and Safety Management Plan

The Health and Safety Management Plan will be a tool that will provide a framework for the following:

• Planning for Health and Safety;

• Accident and Incident Investigation; and

• Health and Safety Auditing.

The H&S Plan will be developed following all the relevant EBRD PRs. TAP AG’s Health, Safety and Environment (HSE) Policy establishes the objectives of TAP AG regarding Health and Safety Management, states that TAP AG is committed to integrating HSE at all levels of business through hands-on leadership and behaviour, and highlights the objective of ensuring safe operations that protect people, the environment, communities and assets. TAP AG has an ongoing focus on improving HSE performance.
The Health and Safety Management Plan will include, at a minimum, the following elements:

- TAP AG’s HSE Policy;

- H&S Organization: detailed organization chart and description of roles and responsibilities associated with managing H&S within TAP AG. The organisation proposed in the plan will take into account the competency of the proposed professionals, and will provide mechanisms to ensure co-operation and communication between the H&S management team members;

- H&S Standards, including the following:
  - Site safety inductions;
  - Hazards identification and risk assessment, including task analysis and construction hazards;
  - H&S targets, and a procedure for safety performance evaluation and review;
  - Emergency procedures;
  - Toolbox meeting procedure;
  - Site visit registers;
  - MSDS (Material Safety Data Sheet) register.

- Accidents and Incidents, including the following:
  - Definitions;
  - Reporting and registering procedures;
  - Root-cause analysis.

- H&S Auditing, including the following:
  - Auditing Plan;
  - Setting audit objectives and measuring H&S performance;
  - Site safety inspection checklists and first-aid equipment checklist.

The plan will include provisions for training all workers and will include procedures related to communication to stakeholders and community improvement opportunities.

9.4.11 Stakeholder Engagement Plan

The Stakeholder Engagement Plan is intended to build and maintain positive relationships between the Project and relevant stakeholders. It establishes procedures for constructive engagement and continuous dialogue that are essential to good business practice and corporate citizenship, as well as Project risk management and performance improvement.
TAP AG has developed guiding principles for stakeholder engagement set forth in the Corporate Social Responsibility Policy (TAP-HSE-PO-0002) to guide Project interactions with stakeholders. According to these principles, stakeholder engagement is to be conducted in a manner that is: Proactive, Transparent, Two-way, Timely, Inclusive, Appropriate, Accessible, Relevant, Free and Accountable. These principles are to be adhered to during all engagements with stakeholders and are applicable for all project functions and the contractor.

TAP AG’s Stakeholder Engagement Strategy adds to the CSR policy by outlining the principles and methods that will govern TAP AG’s engagement with all existing and potential stakeholders at each stage of the project, which are to be specified in the Stakeholder Engagement Plan.

Stakeholder engagement activities are to comply with EBRD Performance Requirements (particularly PR10), National requirements, TAP AG Code of Conduct, TAP AG Stakeholder Engagement Strategy and TAP AG Corporate Social Responsibility Policy.

The objectives of stakeholder engagement activities are to share information and knowledge relating to the Project and potential impacts so that stakeholders understand the risks, impacts and opportunities, to seek to understand the concerns of others, and the building of relationships based on collaboration to achieve positive outcomes.

The following items support the basic principles and scope of an effective Stakeholder Engagement Plan (SEP):

- Systematic stakeholder identification and analysis, building from stakeholder analysis conducted as part of the ESIA. Stakeholders will be categorised on level of influence, potential to be impacted by the Project and likely frequency of Project interaction and other factors as appropriate. Stakeholder profiles, interests and concerns will be analysed to inform the development of appropriate information disclosure and stakeholder engagement activities.

- Development of appropriate information disclosure and stakeholder engagement schedule and activities, considering general engagement methods outlined in the Strategy for Stakeholder Engagement but customised based on stakeholder profiles and project needs.
Prior to the consultations, stakeholders will be provided with comprehensive, readily understandable information about the Project, its schedule, outline of stakeholder consultation activities, potential environmental and social impacts, and any existing proposals for mitigation measures. Engagement and information disclosure activities will be developed to keep stakeholders updated on changes in the project design or schedule on regular basis. TAP AG has established a two tier Third Party Grievance Mechanism based on the provisions outlined in EBRD PR 10 and the EBRD guidance note on grievance mechanisms. Through this instrument TAP AG provides all people who feel unfairly or unjustly treated by TAP AG (individuals, groups, companies, common interest groups, etc.) with an efficient and quick process to voice their grievances and TAP AG has committed to respond to these and provide relevant solutions within 30 days.

Based on TAP AG’s existing Third Party Grievance Mechanism and in line with EBRD PR 2, TAP AG will establish well before the start of construction a grievance mechanism for workers and non-employee workers (and their organisations, where they exist) to raise reasonable workplace concerns. TAP AG will inform all workers etc. of the grievance mechanism at the time of hiring, and make it easily accessible to them. This mechanism will mirror the proceedings of the existing Third Party Grievance Mechanism and address concerns promptly, use an understandable and transparent process that provides feedback to those concerned and assures that there will be no retribution. The mechanism does not impede access to other judicial or administrative remedies that might be available under law or through existing arbitration procedures and/or existing workers grievance mechanisms of TAP AG contractors and/or subcontractors.

Relevant TAP AG and contractor staff will register all project stakeholders, consultation activity, issues raised and commitments made during such consultations.

Commitments made to stakeholders will be carefully monitored and the Project will follow-through and follow-up on these commitments, without building high expectations.

Ensuring a sufficient presence of project representatives on the ground to build long-term relationships between the project staff and stakeholders, and ensure first-hand knowledge of the local issues and ownership over Project commitments.

Information obtained during stakeholder engagements is to be fed into other aspects of project planning in order to make timely consideration of stakeholders’ suggestions for impact mitigation or design or management changes. The Project will report back to stakeholders on the rationale behind rejecting or accepting those suggestions.

Given the dynamic nature of stakeholder engagement, the Project and their relations with one another, the SEP will be reviewed and updated as necessary at least on an annual basis. A SEP is to be developed for each project phase such that stakeholder engagement activities are tailored to Project planning, construction, operation or decommissioning activities.
9.4.12 Livelihoods Restoration Plan

A Livelihoods Restoration Plan will be developed by TAP AG to address potential economic displacement (loss of assets or access to assets, leading to loss of income or means of livelihood) and physical displacement (relocation or loss of shelter) of stakeholders from Project land and easement acquisition. It establishes the entitlements of affected persons or communities and ensures that compensation is provided in a transparent, consistent, and equitable manner in line with the EBRD requirements.

TAP AG has committed that all potential displacement risks will be addressed in full compliance with EBRD-PR 5 and its objective. TAP AG’s Strategy for the Acquisition of Land and Easement (TAP-HSE-ST-0002 – 2) commits TAP AG to mitigate adverse socioeconomic impacts from land acquisition or restrictions on affected persons' use of or access to land. The expected impacts include a) permanent loss of land and access to land needed for the PRT and other above ground facilities, b) temporary loss of livelihoods in the construction corridor and c) permanent land use and building restrictions in the relevant restriction zones. There are several key elements to this mitigation approach including:

- Provide compensation for loss of assets at replacement cost;
- Ensure that potential resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected;
- Improve or, at a minimum, restore the livelihoods and standards of living of potentially displaced persons to pre-Project levels, so as to facilitate sustainable improvements to socio-economic status; and
- Pay particular attention to the needs of vulnerable groups.

In order to realise these objectives, the project will establish a Livelihoods Restoration Framework (LRF) in line with the EBRD Performance Requirements.

The following items underpin the Livelihoods Restoration Plan:

- Project description – Detailed and comprehensive description of the project and all its components and associated facilities, including the land/easement to be acquired.
- Legal framework – Description of the legal framework and legal and customary procedures of private land/easement acquisitions.
- Measures taken to minimize displacement – Description of measures taken to avoid and minimise physical and economic displacements.
- Economic displacement – Comprehensive assessment of the impacts of the economic displacement.
- Entitlement matrix – Entitlement matrix, which identifies the type of impact from land and easement acquisition for each project activity and provides detailed guidance on how stakeholders should be compensated to assure that livelihoods and standards of living of all affected people are restored to levels they would have achieved in a non-TAP scenario and that the living conditions and livelihoods of vulnerable groups are improved.

- Responsibilities for negotiated settlements – Outline of the organisational responsibilities for the negotiated settlements as well as for the expropriation process.

- LRP Stakeholder Engagement Plan – Outlines how the principle of free, prior and informed consultation will be implemented during the purchase negotiations as well as the expropriation process.

- Livelihood Restoration Plan Disclosure – Outline procedures and timeline to disclose draft and final LRPs as well as monitoring reports at local level in a manner that is accessible, understandable and culturally appropriate to ensure that affected stakeholders understand the compensation procedures and know what to expect at the various stages of the project.

- Grievance Mechanism – Description of mechanisms for addressing grievances, complaints and appeals taking into account the availability of judicial recourse as well as traditional conflict resolution mechanisms to solve grievances and address complaints in a timely, impartial and transparent manner.

- LRP completion reports – Evaluation of the quality, outcomes and stakeholder satisfaction of LRP activities. Completion reports will include an evaluation of the degree of stakeholder participation in the decision making process, the number of households that agreed to the TAP AG purchase offer and the number of households that have been expropriated, livelihoods of affected people in relation to the baseline situation and the living conditions of similar populations nearby, whether the policy objectives have been achievement and – if needed – corrective actions to address outstanding issues.

- LRP Monitoring – Outline of the monitoring, which will be conducted by TAP AG as well as by independent evaluators to ensure that complete and objective information are available for the participatory performance monitoring system.

- Displacement Costs – A detailed cost estimate for all identified items based on the principle of replacement costs.

A section focused on fishermen will be added in the LRP.
9.4.13 Social and Environmental Investment Programme

TAP AG is presently preparing a Social and Environmental Investment Plan (SEIP) with the objective to ensure good relations with neighbouring communities, to compensate for unspecific communal impacts and to share benefits. In its CSR Policy, TAP has committed itself to “undertake social and environmental investments in order to enhance living conditions in neighbouring communities and biodiversity and forest cover in and around critical habitats”. The SEIP sets out how investment opportunities are identified, assessed, selected, planned, implemented and supported over the entire lifespan of the pipeline system as a long-term commitment.

The SEIP will be developed in accordance with TAP AG’s Strategy for Social and Environmental Investments (TAP-HSE-ST-0006) and TAP AG’s Corporate Social Responsibility (CSR) policy. To ensure that SEI provides sustainable benefits, both the SEI Strategy (TAP-HSE-ST-0006) and CSR Policy (TAP-HSE-PO-0002) documents have been written based on the IFC principles for SEI (2010). TAP AG’s SEI strategy explicitly adapts IFC’s Good Practice Principles for Strategic Community Investment into a set of clear guiding principles and includes the following:

- **Strategic**: Activities flow from the CSR policy through the strategy to the entire supply chain; a strategic mix that addresses short and long-term objectives; focuses on key areas where TAP AG can effectively leverage its role/competencies and evolves different approaches along the project cycle.

- **Aligned**: Aligns the SEI with communities; civil society & government to create “shared value”, coordinates SEI with ESIA, LEA, stakeholder engagement and promotes cross-functional coordination and responsibilities.

- **Multi-Stakeholder Driven**: Positions TAP AG as a partner in a multi-stakeholder process and supports partners in defining and meeting their own development goals and aspirations.

- **Sustainable**: Avoids dependency and encourages self-reliance and the creation of long-term benefits, all activities require a viable exit or handover strategy and reinforces, rather than replaces local institutions and processes where feasible.

- **Measurable**: Measures returns to TAP AG, local communities and the environment, uses outcome/impact indicators to measure quantity and quality of change, tracks changes, uses participatory methods to build trust and local ownership and proactively communicated the generated value to internal and external audiences.

To set up the SEIP, TAP AG will proceed with the following steps:

**Assessment of the local context and local priority needs**: Through engagement with affected people, local authorities and other interested local stakeholders. TAP AG will assess the local development needs and jointly rank priorities, in line with TAP AG’s aforementioned funding principles.
TAP AG will set up a funding mechanism and selected projects in line with TAP AG’s funding principles and local needs. TAP AG will communicate to local communities how TAP AG’s SEI funding structure and the project application and selection process works.

TAP AG will not plan its SEI from headquarter or country office, but will assist local authorities, communities, environmental agencies and NGOs to elaborate investment requests, invite them to elaborate project applications, request them to join hands during the implementation as well as encourage them to participate in the supervision, monitoring and evaluation.

**SEI Project Implementation** – When SEI opportunities are selected, a specific SEI implementation plan will be developed detailing the rationale for selection, potential partners, roles and responsibilities, and implementation schedule. This will include detail on the selection of contractor for implementation of the SEI, on-going monitoring, as well as the strategy and timeline for phasing out company support or handing over to other financial partners.

9.4.14 Local Content Development Plan

As part of TAP AG’s Local Content Strategy, “TAP and its sub-contractors will recruit and source locally, work with local businesses and give preference to both if they have equal qualifications and comply with TAP’s requirements The potential for local involvement during construction and operation will be discussed with the communities prior to the commencement of such activities and compliance documented through a transparent system of the bidding and selection process” (TAP Policy on CSR 2011, TAP-HSE-PO-0002).

In order to enhance the chances for local companies to win tenders related to TAP (incl. contracts as subcontractors), TAP has identified relevant local companies and assessed their capabilities against TAP requirements. In order to allow them to overcome identified gaps – if any - TAP will invite key sectors to capability enhancement programs. This does not guarantee consideration in TAP’s tendering process, but experience from similar projects show that such training enhances the chances for local companies and therefore local content significantly.

- **TAP presently develops a Supplier Development Program**, which defines the approach and schedule of activities for a supplier development program to correspond to project approval and construction / operation schedule requirements and necessities related to contractual arrangements between TAP AG and key contractors. Based on demand and supply side analysis findings, sectors and commodities will be identified and clustered in order to establish targeted and phased skills and capability enhancement programs. This includes:
  - Intervention methodology (such as classroom training, coaching, on-the-job training, consulting and mentoring options for qualification and certification) and training/sourcing of expertise developed in close coordination with TAP Engineering and potential key contractors (if known) to ensure alignment and reduce guarantee / warranty issues.
Schedule for a phased implementation of program activities (sector by sector) to enable local companies to achieve qualifications and potentially certification with the relevant standards and requirements well in time to participate in the tendering process.

Agreements on monitoring and reporting as well as identification of sectors with high immediate impact and the formulation and implementation of management and supervision structures such as steering committees etc.

Provisions of local content and supplier development for inclusion in technical documentation for key contractors.

- **TAP Qualification and Training for Local Enterprises** – Approach, summary of trainings and schedule of activities for TAP qualification and training for local enterprises.

- **EPC Contracts around LCD** – detail on how EPC contracts are tailored around local content development.

- **LCD compliance during EPC tender process** – Approach and activities to assure local content development compliance during the EPC tender process

- **LCD Monitoring** – Approach and implementation of a monitoring and evaluation system which informs the stakeholders about progress made and to identify emerging challenges and a transparent system of bidding and selection processes for employment, goods and services to document compliance with TAP AG’s local content commitment.

TAP AG’s role will be to engage with governments, financial institutions and other companies on the financing & implementation of a joint local content development program, follow up the process, enhance the quality of the deliverables, assure alignment and compliance with the agree on standards in close collaboration with governments, financial institution and other companies.

### 9.4.15 Workers Management Plan

The **Worker Management Plan** (Workers MP) will be developed to address potential risks to worker rights, labour standards, and health and safety by summarizing expectations and procedures to maintain quality working conditions and, activities.

The following items underpin the **Workers MP**:

- **Legal framework, EBRD PR2 and TAP AG Policies and Strategies related to worker H&S and rights** – Overview TAP AG Code of Conduct, HSE Policy, HSE Risk Management, Policy on CSR, Strategy for Implementing CSR policy under the TSP model, EBRD PR2, relevant Italian laws and other international standards such as ILO labour standards.
• **TAP AG Management Systems related to worker H&S and rights** – Overview of TAP AG Health and Safety Management System including regular training and monitoring as well as on-going safety checks and safety audits. Overview of TAP AG Environmental and Social Management System *including* Key Performance Indicators (KPIs) developed around worker rights, discrimination, management workforce grievance mechanism and monitoring; overview of labour related issues that may be arising based on evaluation of stakeholder engagement activities, community grievances and media coverage.

• **Contractor Management** – Provides overview of how TAP AG considers H&S performance as part of the contractor and supplier selection process, how TAP AG supports contractors and subcontractors to ensure that labour and working conditions are in line with Italian law, international standards and TAP AG policies; approach and activities to monitor and audit all contractors and subcontractors; consequences/escalation process if contractors are found to be *breaching* Italian law, international standards, TAP AG policies or contract clauses.

• **Worker Grievance Mechanism** – Based on TAP’s existing Third Party Grievance Mechanism and in line with EBRD PR 2, TAP will establish well before the start of construction a grievance mechanism for workers and non-employee workers (and their organisations, where they exist) to raise reasonable workplace concerns. TAP will inform all workers of the grievance mechanism at the time of hiring, and make it easily accessible to them. This mechanism will mirror the proceedings of the existing Third Party Grievance Mechanism and address concerns promptly, use an understandable and transparent process that provides feedback to those concerned and assures that there will be no retribution. The mechanism does not impede access to other judicial or administrative remedies that might be available under law or through existing arbitration procedures and/or existing workers grievance mechanisms of TAP contractors and/or subcontractors

• **Monitoring** – Approach to monitoring worker H&S and rights performance (in alignment with socioeconomic *compliance* monitoring) and worker grievance trends and response performance to evaluate and continuously improve on management activities.
9.4.16 Infrastructure and Utilities Management Plan

The *Infrastructure and Utilities Plan (IUP)* will be developed to detail actions to minimise disruptions to utilities and deliver benefits through Project investment in infrastructure. The objectives of the Infrastructure and Utilities Management Plan are as follows:

- minimise damage to settlements and households assets from construction process;
- ensure no significant temporary loss of, or access to, infrastructure or services;
- no reduction in services available to the local communities; and
- ensure that project benefits derived from new infrastructures (access roads, electric and water supplies, landfills, sewage systems etc.) will contribute to the physical and economic development of local communities in the study area.

The following items constitute the IUP:


- *Stakeholder notification and engagement* – Approach and activities to notify and consult with stakeholders on infrastructure development and utilities; include description of planned pre-construction and post-construction surveys and stakeholder sign-off; community liaison role and responsibilities; grievance process with required response times specifically for infrastructure and/or utility related grievances; provide approach and procedures (including compensation activities) in the event that utilities are unexpectedly disrupted by project related activities

- *Public Utilities Assessment* – Detail the scope and findings of the public utilities assessment which will assess: access or connection points to grid, network or sewer system at regional, municipality/commune level; available electricity provider/water supplier and their total production as well as available sewage services and capacity; available electricity/water supply or sewage; total electricity / water consumption today and known trends (without the TAP Project), sewage capacity needs by the TAP Project; overall supply needs for the TAP Project (per region and municipality/commune as applicable). Measures required updating TAP AG and contractor management plans and activities based on the findings of this assessment. The assessment will also include the actions planned for managing the expected and potential interruptions in the availability of sewage, electricity and telecommunications.

- *Road Closure and Construction* – Requirements for road closure for construction/upgrade activity and measures to minimize disruption such as detail on diversions and how the public will be notified of the diversions; identification of road upgrade plans and how TAP AG will transfer the new roads and the upgraded roads to local authorities.
• **Infrastructure Improvement Plan** – Approach to selecting infrastructure improvement activities; infrastructure improvements planned (access roads, electric and water supplies, landfills, sewage systems etc.) and how these will contribute to the physical and economic development of local communities in the study area; approach to transitioning new/enhanced infrastructures developed by the Project to local communities to ensure the long-term sustainability of these investment opportunities.

• **Monitoring** – Approach to monitoring infrastructure improvements and any utility disruptions including community grievance trends and response performance to evaluate and continuously improve on management activities relating to infrastructure development and utility disruptions.

9.4.17 Community Health Management Plan

The *Community Health Management Plan* (Community Health MP) will be developed to avoid or minimise the risks and adverse impacts to community health (including safety and security) that may arise from project activities to ensure safe operations that protect communities. The project can increase the potential for community exposure to risks and impacts arising from temporary or permanent changes in population from project workforces as well as project activities (planned and unplanned). For this reason, the management of community health is closely connected with worker health, worker behaviour and Project safety measures.

The objectives of the Community Health MP are to avoid or minimise risks to and impacts on the health and safety of the local community during the project and to ensure that the safeguarding of project, related personnel and property is carried out in a legitimate manner that avoids or minimises risks to the community’s safety and security.

The following items underpin the Community Health MP:

• **Legal framework, EBRD PR4 and TAP Policies and Strategies related to community H&S and rights** – Overview TAP Code of Conduct, HSE Policy, HSE Risk Management, Policy on CSR, Strategy for Implementing CSR policy under the TSP model.

• **TAP AG Management Systems related to community H&S and rights** – Overview of TAP AG Health and Safety Management System including regular training and monitoring as well as on-going safety checks and safety audits; overview of TAP AG Environmental and Social Management System including Social Compliance Monitoring and consideration of human trafficking risks; overview of labour related issues that may be arising based on evaluation of stakeholder engagement activities, community grievances and media coverage.
- **Project H&S controls relating to community** – Provide overview of Project H&S controls including Project fencing (and monitoring), Project driving and parking safety measures as well as transportation route planning and grievance mechanisms available at rest stops and worker accommodation points; provide overview of Project and contractor (including trucking company) H&S management and TAP AG requirements including health screening, code of conduct training, disease awareness and H&S training.

- **Capacity / needs assessment of hospital equipment and personnel** – this plan will include an assessment of hospital equipment and personnel along the route and in Tirana to determine if facilities have sufficient resources to deal with emergencies; include process to enter into agreements with suitable hospitals to provide health care in emergency situations.

- **ERPs** – based on the findings of the local hospital capacity and needs assessment, provide approach and schedule to develop ERPs in consultation with Italian emergency providers and local health facilities to coordinate emergency activities to encompass the local community, worker and contractor / subcontractor.

- **Stakeholder H&S Awareness and Engagement** – provide approach, activities and description of materials for stakeholder engagement and consultation to educate local communities of the risks of trespassing onto sites, the meaning of signs, the dangers of playing on or near equipment or entering fenced areas; include presenting in every primary and secondary school in communities along the pipeline route; include procedures for documenting meetings and uploading this information into the SCD. H&S awareness presentations at schools will also include other Project aspects such as construction methods, pipelines and skills required to work in construction to improve youth understanding of the Project and H&S aspects.

- **Project Security Measures and Conduct** – activities to prevent trespass onto work fronts and equipment and manage security personnel conduct; include scope and frequency of security personnel training in line with the UN Voluntary Principles on Security and Human Rights.

- **Community and Worker Grievance Mechanisms** – Provide overview of community grievance mechanism and separate worker grievance mechanism as important tools for maintaining awareness of and evaluating potential risks and impacts to community health, safety and security.

- **Monitoring** – Summarize approach to monitoring worker H&S and rights performance as well as worker grievance and community grievance trends and response, and how this information will be fed into adjustments / improvements to community health management activities; provide approach to monitoring the emergence of major pandemics (through World Health Organization – WHO alerts); include how level 4 WHO Pandemic Alert will trigger implementation of the relevant ERPs.
9.4.18 Biodiversity Action Plan

In order to deal with the biodiversity component characterising the area potentially affected by the Project, TAP AG will develop a Biodiversity Action Plan (BAP) whose aim will be the integration of biodiversity conservation within the environmental management systems of its operations. A BAP is a series of coordinated practical measures that respond to the strategic vision of ensuring the conservation of all species and the maintenance of all ecosystem functions. It will be directed to protect what exists and restore whatever of the local biodiversity that was degraded. A BAP identifies all actions needed to meet the goals, describes the means to implement them, and defines the time, resources and responsibility to accomplish them.

The major elements of a Biodiversity Action Plan could preliminarily include:

- Audit, to review the condition of the local biodiversity;
- Objectives, to focus actions on precise targets;
- Priorities, to optimise the available resources;
- Action plans for species and habitats, to list and describe all actions to be implemented on natural components;
- Monitoring and review arrangements, to keep track of how the targets are progressively met and to adapt the actions to changing conditions. The TAP AG Biodiversity Action Plan will include a number of different elements covering the construction, operation and decommissioning phases of the project. For the design of the BAP the following elements must be defined:

Prerequisites:

- Stakeholder engagement and consultation;
- Partnerships evaluation;
- Consider biodiversity priorities, resource/staff availability, and timing and costs issues;
- A baseline survey of biodiversity and indicators selection.
As part of this exercise a consultation process will be undertaken with key stakeholders (including WWF Salento, SaveSalento and Italia Nostra) to confirm the key elements of the BAP and also to initiate participation with the planning and implementation from stakeholders of the BAP (which may also include potential TAP support for non-governmental organizations (NGOs) or initiatives in the area of the pipeline’s corridor). All required elements will be examined in an iterative process and currently it is thought that to adequately cover flora, fauna and designated areas during construction and operation, the Biodiversity Action Plan will address both onshore and offshore biodiversity and will include the following 3 elements:

- Construction Biodiversity Action Plan;
- Operational Biodiversity Action Plan; and
- Decommissioning Biodiversity Action Plan.

9.4.18.1 Implementing the Plans

Once the previous design process is complete, the next step will be to develop a management schedule for the implementation. This process will ensure that TAP AG’s BAP is conducted in order to meet the defined objectives and priorities.

9.4.18.2 Monitoring, Communication and Verification of Performance

This process of verification and improvement must be aligned with Company Environmental Management Systems (EMS). The necessary Actions to implement these activities are:

- Monitoring: Identify organization(s) with responsibility for managing monitoring activities and reporting on the progress being made on individual actions. TAP AG will appoint a dedicated team to implement the BAP made up of employed staff members, independent consultants, and scientific entities as well as NGOs given the necessary funding to implement the works. TAP AG will track the BAP implementation. The monitoring will be intended to determine the potential effects on biodiversity generated by the project - introduced changes in comparison with the baseline. The monitoring programme will make sure that the introduced mitigation measures and restoration works are effective and identify the corrective actions in case deficiencies are identified.

- Evaluation: BAP will review indicators and performance against objectives, targets and stakeholder expectations. Periodically, a review of objectives and targets will be made in order to determine their achievement or not, and the eventual need to introduce the required enhancements for the action plan.
• Reporting: The communication and verification of the progress and outcomes of the BAP to all interested parties will help to build support and increase the probability of success for current and future biodiversity-related activities. The participation of the local people will be the key source for the evaluation of indirect impacts from logging, hunting, fishing or overharvesting. Therefore, the inclusion of such people within stakeholder engagement groups will be essential in the success of all the BAP elements and will also help to manage expectations, to promote the partnership approach and to avoid conflict. Reporting will be performed through the development of an alternative, independent mechanism, such as a website on biodiversity activities, which will include the development of tools to report data internally, making data available for reference and decision making to practitioners, management and to local NGO and government groups for species and habitat records.

With regard to offshore biodiversity elements (benthos, nekton, marine reptiles, birds and mammals), an offshore-specific section will be added in the BAP.

9.4.19 Landscape Management Plan

This management plan is a summary guide towards ensuring that the reinstated landscape works following construction of the pipeline and the newly introduced planting works around large structures such as the PRT will become established and will conform to the mitigation measures outlined in Section 8 of the ESIA.

9.4.19.1 Construction Phase

• Vegetation to be retained (adjacent to the TAP Project construction site) will be protected by the installation of protective fencing for the duration of the works.

• Topsoil will be stored near the location from which it was stripped and, where possible, returned to that location. Topsoil will be kept separate from subsoil and will be stored in heaps that will not exceed 2 m in height in order to preserve the soil structure for future use.

• Prior to reinstating topsoil at ridge modification locations, an assessment of slope stability will be undertaken and necessary measures to control erosion of subsoil will be implemented.

• The Landscape Management Plan will include all the procedures to follow during restoration works, including restoration and monitoring procedures.

9.4.19.2 Operation Phase

• A detailed landscape management plan for the early years of establishment (years 1-5 of operation) will be developed for the TAP Project landscape works covering maintenance requirements for a range of landscape treatments including reinstatement of agricultural area, olive groves and dry stone walls. Woody vegetation planting will be implemented to replace that lost during construction.
• A detailed long-term landscape management plan will be developed for the lifetime of the TAP Project. The long-term management plan will continue to address issues relating to olive trees control and grass cutting.

• Finally, all landscape management plans will be developed to be consistent with ecological habitat management plans.

9.4.19.3 Decommissioning Phase

Refer to Construction phase.

9.5 Summary and Way Forward

The Sections above outline the plans that will be further developed as part of TAP’s Environmental and Social Management System (ESMS). The ESMS will be a ‘living’ document designed to ensure that the commitments made by TAP AG in the ESIA and well as other subsequent documents are collated and managed in a systematic way to ensure that they are implemented in practice during the construction, operation and eventual decommissioning of the TAP pipeline.

The ESMS will also apply to the contractors that TAP will engage for construction of the pipeline. The ESMS will contain a number of Contractor Control Plans (CCPs) which will be attached to the Invitation to Tender for contractors. These CCPs will specific TAP AG’s requirements in all relevant aspects such as, e.g. cultural heritage management, ecological management, reinstatement and revegetation, community health and safety, etc. The selected contractors will be required to develop their own Implementation Plans based on these CCPs and their performance will be audited and monitored against these Plans.

The ESMS is therefore the tool that enables the ESIA process to continue beyond the production of the ESIA document itself and ensure that TAP AG achieves the highest international standard of environmental and social performance such that impacts are minimized and mainly related to the temporary construction phase and that long-term benefits to the local community are maximized.

To assure that the ESMS is fully in line with the provisions agreed in the ESIA as well as informed by the concerns and guidance of all stakeholders, the detailed provisions of the ESMS will be specified in an Environmental and Social Management and Monitoring Plan (ESMMP) in full compliance with international best practice as outlined in EBRD PR 1. This ESMMP and the associated ESMS will be developed after the finalization of the ESIA and well in advance of any key contracts for construction being awarded. TAP AG will disclose the draft ESMMP on its webpage, invite for comments, organize a feedback workshop and finalise the ESMMP based on these comments before disclosing it at similar places etc. as the final ESIA.