

## ENVIRONMENTAL AND SOCIAL ACTION PLAN TEMPLATE

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR/IFC PS, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
<b>PR1</b>	<b>Assessment and Management of Environmental and Social Impacts and Issues</b>						
1.1	Implementation of the Project in accordance with the commitments in the Project Documents, including the ESIA, AESIA, ESMP, BMP, BAP, SEP, LRF and this ESAP.	To ensure impacts are avoided and mitigated as planned.	EBRD PR1/IFC PS1	BSOG resources including augmented environmental and social team for construction.	For the life of the Project.	BSOG annual reports to Project lenders and Project Lenders monitoring	
1.2	Update the ESMP and any of the Company Level Management Plans that require updating.	To clearly articulate measures for avoidance, mitigation, management and monitoring.	EBRD PR1/IFC PS1 GIP	BSOG, EPC contractor and consultants	60 days prior to construction activities beyond surveying, land clearance and surficial earth moving.	Revised plans to be disclosed on BSOG website	

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1.3	Update ESMP to cover Operations phase before commencement of operations.	To clearly articulate measures for avoidance, mitigation, management and monitoring.	EBRD PR1/IFC PS1  GIP	BSOG, EPC contractor and Consultants	Confirmed with Project Lenders and disclosed on web site 60 days prior to operations.	Revised plans to be disclosed on BSOG website	
1.4	BSOG will finalise the design for the onshore pipeline construction with an objective to avoid impacts to sensitive resources.	To ensure NNL of sensitive biodiversity	EBRD PR1/IFC PS1	BSOG, EPC contractor and consultant	60 days prior to start of onshore construction activities	Revised plans confirmed with Project Lenders and be disclosed on BSOG website	
1.5	BSOG must approve all Contractor level management plans to ensure conformance to Project Requirements before the contractor begins work.	Contractor management	EBRD PRs/IFC PSs 1 & 2 GIP	BSOG and EPC Contractor	At least two weeks before start of activity.	Approved documents listed in Annual Report and available during site monitoring visit.	
1.6	Require the EPC contractor to ensure the timely availability of resources (staff, budget, equipment) to organize and implement the EPC contractor's obligations under the ESAP and ESMP.	E&S resources to be made available	EBRD PR 1/IFC PS1	BSOG to require EPC contractor to implement	As long as the EPC contract is effective.	Resources budgeted and mobilized timely.	

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1.7	Maintain permit register as part of the Project IMS and monitor EPC contractor's compliance with permit conditions	Ensuring that permit conditions are met at all times.	EBRD PR 1//IFC PS1 and National regulations	BSOG	Throughout Project implementation	Updated permit register submitted with quarterly reports	
<b>PR2</b>	<b>Labour and Working Conditions</b>						
2.1	Prepare and implement HR policy and procedures to meet EBRD/IFC and national legislation requirements	Improved human resources practices and compliance with National legislations and PR2 requirements	EBRD/IFC requirements (EU/ILO standards) National legislations	BSOG Contractors	Throughout the lifetime of the project	HR management plans and procedures	
2.2	Undertake construction labour audits, including contractor workers.	Ensure construction labour practice complies with the relevant national and EBRD PR 2 standards	EBRD PR 2/IFC PS2 and National Labour law	BSOG own resources (use external labour auditor if required)	Quarterly starting one month prior to main construction phase	Quarterly Labour Audit Reports Labour Actions tracker Progress updates submitted to Lenders on corrective actions	

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2.3	To ensure local employment KPIs/targets are achieved by its Contractors through effective monitoring of the contractors, and skill surveys(if required)	Optimise the employment opportunities for local people in project affected villages  Establishment of good neighbouring relationship with the communities	Good practice Managing expectations	BSOG and Contractors	Throughout the lifetime of the project	<ul style="list-style-type: none"> <li>• Skill survey conducted</li> <li>• Local recruitment offices are established</li> <li>• Local employment KPIs reported to the Lenders</li> </ul>	
<b>PR3</b>	<b>Resource Efficiency and Pollution Prevention and Control</b>						
3.1	Publish annual reports on Green House Gas Emissions on the project's web site	Promote transparency and public knowledge of emissions	EBRD PR3/IFC PS3  GIP	BSOG	For operating phase, first report three months following year end of first year operations. Then every year during operations	Report on BSOG project web site	

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3.2	Annual review of options for reducing GHG emissions related to operations.	Promote resource efficiency and minimise emissions	EBRD PR3/IFC PS3 GIP	BSOG	To be included in Annual Environmental and Social Report, end April following every year of operations	Annual Report provided to EBRD	
<b>PR4 Health and Safety</b>							
4.1	Ensure through the OHS management system that no new activity/work starts unless an on-site job- and task-specific hazard analysis was undertaken in presence of the staff and of a qualified OHS supervisor/manager, including the following aspects: <ul style="list-style-type: none"> <li>• Staff's own language(s)</li> <li>• Personal and Collective Protection Equipment</li> <li>• Record-keeping, including near misses and incidents</li> <li>• Toolbox talks to share information on risks, accident prevention, etc.</li> </ul>	Managing OHS risks	EBRD PR 4/IFC PS4 Good International Practice	BSOG and contractors	Throughout construction and operation	on-site job- and task-specific hazard analysis carried-out	

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4.2	BSOG HSE Manager perform review of contractors reports, incident reporting and perform inspections of conformance to Project requirements for OHS issues on routine basis during construction.	Management of OHS risks in the contractors	EBRD PR4/IFC PS4 GIP	BSOG	Routinely during construction, based on risk analysis of activities.	Results to be summarised in an Annual report to Project Lenders	
<b>PR5 Land Acquisition, Involuntary Resettlement and Economic Displacement</b>							
5.1	BSOG will regularly review the project schedule to ensure mitigation measures proposed in the Project Documents will achieve the desired outcomes. If required, a Livelihood Restoration Plan informed by adequate baseline data acquisition will be developed and implemented to minimise & compensate potential impacts on livelihoods of fishermen, small businesses dealing with tourism activities	To minimise economic impacts	EBRD PR5/IFC PS5 GIP	BSOG and consultant	Ongoing review of LRF implementation  If an LRP is required, this will be developed at least 3 months before any impacts will occur impact	Monitoring of LRF to be summarised in an Annual report to Project lenders  Disclosure of updated plans on BSOG website	

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<b>PR6</b>	<b>Biodiversity and Living Natural Resources</b>						
6.1	BSOG will hire a Biodiversity specialist, reporting to the HSSE Manager, to oversee the implementation to the Biodiversity Management Plan (BMP) and Biodiversity Action Plan (BAP)	Adequate project level capacity to implement BMP/BAP commitments  Contractor management/monitoring	EBRD PRs/IFC PSs 1 & 6 GIP	BSOG	Biodiversity specialist in place 2 months prior to construction	Job description is prepared and available for consultation by Project Lenders  Biodiversity specialist in place 2 months prior to construction	
6.2	Update framework Biodiversity Management Plan, covering onshore and offshore biodiversity conservation and management commitments	Contractor management/monitoring	EBRD PRs/IFC PSs 1 & 6 GIP	BSOG  EPC Contractor	Updated BMP in place 2 months prior to construction	BMP prepared and disclosed on BSOG website  Training programme developed for EPC contractors	

<p>6.3</p>	<p>The Project will develop a detailed method statement covering all onshore works within the protected area(s) to minimise impacts on species and habitats of conservation importance. At a minimum, the method statement will address:</p> <ul style="list-style-type: none"> <li>• Roles &amp; responsibilities</li> <li>• Overview of site, including priority biodiversity features/critical habitat to avoid</li> <li>• Site specific environmental approval conditions</li> <li>• Relevant BMP commitments including seasonal constraints/construction scheduling</li> <li>• Pre-construction surveys (methodology)</li> <li>• HDD and trenching methodologies</li> <li>• Topsoil management &amp; reinstatement</li> <li>• Management of riparian habitats / reinstatement</li> </ul>	<p>Contractor management/ monitoring</p>	<p>EBRD PR6/IFC PS6</p> <p>GIP</p>	<p>BSOG</p> <p>External support</p>	<p>Method statement in place 1 month prior to onshore construction works</p>	<p>Method statement prepared and available for consultation</p> <p>Final method statement disclosed on BSOG website</p> <p>Training programme developed for EPC contractors</p>	
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6.4	BSOG will reassess potential residual impacts to critical habitat and priority biodiversity features following reinstatement. In doing so, BSOG will update the critical habitat assessment (CHA) and develop a more comprehensive Biodiversity Action Plan (BAP) to provide additional details and to refine the Project's approach on biodiversity offset design, intended conservation outcomes, specific management actions and details on the legal and financial mechanisms (including budget) for achieving No Net Loss / Net Gain of Biodiversity in accordance with PR6	No Net Loss / Net Gain of Biodiversity	EBRD PR6/IFC PS6  GIP	BSOG  External support	Revised CHA and BAP prepared and available by Q4 2020  Final CHA and BAP to be in place by Q1 2021  Implementation of BAP by BSOG from Q1 2021 onwards	Final BAP and CHA to be disclosed on BSOG website	

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<b>PR8</b>	<b>Cultural Heritage</b>						
8.1	Prepare and implement Chance Finds Procedure	Minimise risk of impacts on cultural heritage	EBRD PR 8/ IFC PS8	Contractor	Throughout construction	Chance find procedure Records of implementation held for Lender review	
<b>PR10</b>	<b>Information Disclosure and Stakeholder Engagement</b>						
10.1	Implement the SEP and review at least annually for any required updates.	To ensure adequate & ongoing stakeholder engagement.	EBRD PRs 1 & 10/ IFC PS1  GIP	BSOG	Annually	Updated SEP to be disclosed on BSOG website	
10.2	Implement an effective community grievance mechanism	Ensure effective stakeholder engagement and maintain good community relations	EBRD PR 10/IFC PS1	BSOG	Throughout the lifetime of the project	Record of Grievance Resolution meetings Grievance database maintained. Regular reports on Grievance management are available to the Lenders	

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10.3	Design and implement a Community Investment Strategy, linked with the Stakeholder Engagement Plan, and the LRP.	Establishing and delivering appropriate and sustainable community benefits	EBRD PR 1 and 10 / IFC PS1	BSOG	Annually throughout the life time of the project	Community Investment Projects documented and submitted to the lenders and shared with the wider community.	
10.4	Prepare an Annual Environmental and Social Report	Keep shareholders and lenders updated on material Environmental and Social issues.	EBRD PR 1 &10 /IFC PS1 GIP	BSOG	Throughout the lifetime of the project  Within 90 days after each calendar year.	Annual Environmental and Social Report to be disclosed on BSOG website	