



ENVIRONMENTAL & SOCIAL ACTION PLAN

**ENVIRONMENTAL AND SOCIAL ACTION PLAN
ENERGEAN PRINOS DEVELOPMENT PROJECT, GREECE**

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	Submit an environmental and social ¹ report to the EBRD on the environmental and social performance of the Project and the status of the implementation of this ESAP.	EBRD reporting requirement	EBRD PR 1	Internal resources	<p>First report: within 30 days following completion of construction (Lamda and associated pipelines).</p> <p>During operation: annual environmental and social report and ESAP progress update to the EBRD within 60 days of Company year-end.</p>	<p>Environmental and social reports (template to be provided by the EBRD) and ESAP progress updates received.</p> <p>Reports and progress against this ESAP satisfactory to the EBRD.</p>	

¹ 'Environmental and social' includes occupational and community health, safety, and security, as well as human resources matters and working conditions.

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1.2	Extend (and maintain for existing operations), and where necessary update and revise, the existing environmental and health and safety management system and associated procedures and provisions to the Project, including its construction, commissioning, operation and decommissioning.	Appropriate management of environmental and social issues through implementation of a formal management system	EBRD PR1 Best practice	Internal resources/ external consultants Assign responsibilities	During construction, operation and decommissioning Updates and revisions in place before construction	EHS management system implemented and applied to the Project during construction, operation and decommissioning. EHS management system updated and revised to include the Project and any subsequent field developments.	
1.3	Develop the existing framework environmental and social management and monitoring plans in the Project ESIA into fully detailed plans and integrate them into the EHS management system.	Management and monitoring of environmental and social issues through implementation of appropriate management and monitoring plans.	EBRD PR1 Best practice	Internal resources/ external consultants Assign responsibilities	Prior to construction and operations where relevant	Fully developed environmental and social management and monitoring plans in place and implemented.	

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1.4	Ensure that the necessary provisions are in place to manage environmental, health and safety and labour risks associated with contractors and suppliers including the inclusion of the necessary clauses in tenders and contracts and regular Company monitoring and audits of contractor and supplier performance.	Management and monitoring of potential contractor environmental, health and safety and labour risks.	EBRD PR1 and 2 Best practice	Internal resources Assign responsibilities	In place prior to appointment of contractors or suppliers. Management and monitoring during contracting periods.	Adequate provisions in place to manage contractor and supply chain environmental, health and safety and labour risks.	
1.5	2 years prior to offshore infrastructure abandonment or decommissioning, develop an abandonment/ decommissioning plan in line with good industry practice and national legislation. Ensure that the key elements of the plan are appropriately communicated to authorities and other stakeholders and that such plan includes commitments with respect to waste management and monitoring.	Management of abandonment risks	EBRD PR1, 3 and 6	Internal resources	2 years prior to offshore infrastructure abandonment or decommissioning	Abandonment / decommissioning plan in place	

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PR2	Labour and Working Conditions						
2.1	Ensure that Human Resources (HR) provisions and working conditions for Company employees and contractors are in line with PR 2 and national labour requirements. See 1.4 with respect to contractors.	Appropriate management of Company and contractor labour risks	EBRD PR2 Labour legislation	Internal resources	Prior to construction and during the life of the Project and existing operations	Company HR provisions and working conditions in line with PR2 and national labour requirements. Company HR requirements applied to contractors.	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	Implement a programme of maintenance of existing offshore infrastructure (Delta, Alpha and Beta platforms) including sandblasting, equipment protection, painting, etc.	Prevent equipment deterioration and failure	EBRD PR3 Best Practice	Internal resources and maintenance contractors	Programme initiated within 1 year of operations commencing on the Project.	Maintenance programme in place and implemented.	
3.2	Develop a full Greenhouse Gas Inventory for the Project, existing offshore facilities and the onshore processing plant. Update this on an annual basis.	GHG reporting	EBRD PR3 National requirement	Internal resources	Annually	GHG inventory in place and reported as required to EBRD and national regulators.	
3.3	Ensure that any upgrades to the onshore power generation facility (Sigma "power plant") are in line with applicable national and EU legislations and standards with respect to permitting and emissions.	Compliance with standards	EBRD PR3 National /EU requirements	Internal resources/ Design consultant	During development and operation of the power plant.	Power plant compliant with national and EU standards and requirements.	

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PR4	Health and Safety						
4.1	Incorporate into the design the recommendations of the Quantitative Risk Assessment (QRA) undertaken as part of the ESIA.	Risk management	EBRD PR4	Internal resources and contractors	Prior to construction works	Recommendations of the Quantitative Risk Assessment (QRA) implemented.	
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	For onshore laydown areas ensure that the land is used with the permission of the landowner and/or land user and returned to the owners of such land in its original state. This may require the payment of rent and site reinstatement and waste removal.	Land use risks and reinstatement	EBRD PR5	Internal resources	Prior to and post onshore lay down works.	Temporary laydown areas reinstated.	
PR6	Biodiversity and Living Natural Resources						
6.1	Ensure that the necessary measures are implemented to mitigate and manage potential impacts to marine ecology including marine mammals.	Impact mitigation and management	EBRD PR6	Internal resources and contractors	Prior to and during construction and drilling works	Impacts to marine mammals appropriately mitigated and managed.	
PR8	Cultural Heritage						
8.1	Implement the chance finds procedure during construction works	Management of potential chance finds	EBRD PR8	Internal resources and contractors	During construction works	Chance finds (if any) appropriately managed in line with the chance finds procedure.	

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PR10	Information Disclosure and Stakeholder Engagement						
10.1	Implement and maintain the stakeholder engagement plan (SEP) for the life of project. The SEP should be revised and updated on a regular basis. The SEP may be integrated into existing company procedures.	Appropriate stakeholder engagement and information disclosure	EBRD PR10	Internal resources	During ESIA disclosure and for the life of the Project	SEP implemented and maintained.	
10.2	Implement and maintain a functional external grievance mechanism for the life of the Project.	Stakeholder grievance management	EBRD PR10	Internal resources	During ESIA disclosure and for the life of the Project	Grievance mechanism implemented and maintained.	