 Macaé Merchant	ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN				FORM. No. O-EF 005.C
	DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	CONTINUOUS IMPROVEMENT
COPY No. 001	PAGE 2 of 4	MONTHLY REPORT			REV. No. 001

2. Emergency Communication, O-EP 004

Doc. Number	Accident Description	Characteristics			
		Injury	Spill	Death	Other

Remarks:

3. Internal Communication, O-EP 005

Doc. Number	Major Issues	Subcontractors	AG + MMPP	MMPP + Owners


4. Outreach to Stakeholders, O-EP 006

Number of Contacts:	
Type of Contacts and Concerns:	

5. Management of Inquiries from Stakeholders, O-EP 007

Number of contacts:	
Major Environmental Concerns:	

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	DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	CONTINUOUS IMPROVEMENT
COPY No. 001	PAGE 3 of 4	MONTHLY REPORT			REV. No. 001

6. Training, O-EP 008

Subject	Date

7. Monitoring, O-EP 009 through O-EP 014

Major problems:

Non-compliance (n ^o)	Accumulated Verifications	Corrective Actions	Status NA A C	How many demanded a CAR

NA – Not Available I – Initial phase A – Advanced Phase C – Completed

8. Continuous Improvement, O-EP 015 through O-EP 021

Major Problems:

Non-Compliance (n ^o)	Accumulated Verifications	Corrective Actions	Status NA A C	How many demanded a CAR

NA – Not Available I – Initial Phase A – Advanced Phase C – Completed

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9. Environmental Performance Evaluation, O-EP 022

Indicators Not On Target	Comments

Note: All documents mentioned are annexed.

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	ENVIRONMENTAL MANAGEMENT SYSTEM PLAN				PROC. No.: O-EP 006
	DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	CONTINUOUS IMPROVEMENT
COPY No. 001	PAGE 1 of 2	OUTREACH TO STAKEHOLDERS			REV. No. 001

1. Purpose

This procedure is intended to establish a process for environmental communication between the Macaé Merchant Power Plant and its stakeholders, such as regulatory agencies, the public and local community groups.

The Macaé Merchant Power Plant recognizes that proactive two-way communication with its stakeholders is important for an effective environmental management system. Taking steps to obtain the views of these stakeholders, which include neighbors, customers, community groups, and regulators, will help the company better understand how the Macaé Merchant Power Plant is perceived by others.

The Macaé Merchant Power Plant will also consider strategies to garner specific advice from these stakeholders when developing critical elements of the EMMP, such as setting objectives and targets.

2. Scope

This procedure discusses proactive steps that the Macaé Merchant Power Plant will take to maintain a meaningful dialog with all stakeholders on environmental matters.

3. Responsible Parties

- The El Paso Corporate Environmental Department and the Brazilian Environmental Manager.
- The Environmental Coordinator and the HSE Supervisor.
- The Plant Manager.

4. Forms Used

- Distribution of Pamphlets, Brochures, etc, O-EF 006.A;
- Field Visits, O-EF 006.B;
- Meeting, O-EF 006.C;
- Information Monitoring, O – EF 006.D;

Note: All forms must be numbered before filling.

5. Definitions

External Communications: written or electronic correspondence, telephone conversations and verbal discussions or meetings with anyone outside the company.

Stakeholders: Individuals or groups with an interest in the environmental impacts of the Macaé Merchant Power Plant products, activities or services. These stakeholders include regulators, local residents, employees, stockholders, insurers, customers, environmental groups and the general public (adapted from ISO 14001).

6. Exclusions

All external communications regarding emergency situations are addressed in the Emergency Communication Procedure (O-EP 004).

7. Procedure

The Macaé Merchant Power Plant encourages stakeholders to know its EMMP, its environmental performance and other related matters. In particular, such outreach activities are conducted when significant changes at the facility are being considered, such as expansions or other actions that might affect the actual or potential environmental impacts of its products, activities or services.

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	ENVIRONMENTAL MANAGEMENT SYSTEM PLAN				PROC. No.: O-EP 006
	DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	
COPY No. 001	PAGE 2 of 2	OUTREACH TO STAKEHOLDERS			REV. No. 001

In consultation with the El Paso Brazilian Environmental Manager, the Environmental Coordinator is responsible for participating in all events with the community and completing forms O-EF 006 (A through F), as appropriate.

Help may be requested as required, from the El Paso Corporate Environmental Department .

Regulatory Agencies have the authority to request specific types of information from the Macaé Merchant Power Plant. They also have the authority to enter the facility for the purpose of conducting regulatory compliance inspections.

The Environmental Coordinator (Environmental Agencies) and the HSE Supervisor (Labor Ministry personnel) are required to check the credentials of any Official requesting information or entry to the plant.

If a Notice of Violation (NOV) is received at the plant, the El Paso Brazilian Environmental Manager must be notified and provided with a copy of the Notice of Violation, including all relevant information related to the Notice.

The Macaé Merchant Power Plant personnel will not undertake environment-related negotiations or communications without close consultation with the El Paso Brazilian Environmental Manager. Any such negotiation or communication that could have financial or operating impacts will necessarily depend on the explicit consent of the owners, who may appoint appropriate internal representation.

8. General Rules

The Macaé Merchant Power Plant will deploy a variety of mechanisms to ensure effective communications with its stakeholders. These mechanisms include regulatory filings (such as permit applications and reports), web sites, e-mail listings, annual reports, advertising, open houses, the media, as well as informal discussions with

regulators, community representatives, and local business leaders.

To solicit the views of stakeholders, the Macaé Merchant Power Plant may use additional techniques, including but not limited to, surveys, community advisory panels, newsletters, or informal meetings with representatives of outside groups.

General rules for external communications require that the information provided by the company is:

- Understandable and adequately explained to the recipient(s); and,
- Presents an accurate and verifiable picture of the company and its environmental management system, its environmental performance, or other related matters.

9. Records

The HSE Supervisor will maintain records of external environmental communication with Regulatory Agencies, stakeholders and the media.

10. Record of Revisions

Revision Date	Description	Sections Affected

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ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN

FORM. No.:
O-EF 006.A

DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	CONTINUOUS IMPROVEMENT
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DOC. No.:

COPY No.
001

PAGE
1 of 1

DISTRIBUTION OF PAMPHLETS, BROCHURES, ETC.

REV. No.
001

Person Responsible: _____

Title	Organization	Address	Period	N.º of copies sent	
				Pamphlets	Others
Total					

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ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN

FORM. No.:
O-EF 006.B

DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	CONTINUOUS IMPROVEMENT
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DOC. No.:

COPY No.
001

PAGE
1 of 1


FIELD VISITS

REV. No.
001

Person Responsible: _____

Person Interviewed	Issues	Location	Date

DEVELOPED BY	REVIEWED BY	APPROVED BY

	ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN				PROC. No.: O-EP 007
	DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	
COPY No. 001	PAGE 1 of 2	MANAGEMENT OF INQUIRIES FROM STAKEHOLDERS			REV. No. 001

1. Purpose

This procedure is intended to establish a process for managing environmental inquiries from stakeholders, such as regulatory authorities, the general public and local community groups.

2. Scope

This procedure describes how the Macaé Merchant Power Plant receives documents and responds to communications from outside parties.

3. Responsible Parties

- The El Paso Corporate Environmental Department.
- The Environmental Coordinator.
- The HSE Supervisor.
- The Plant Manager.

4. Forms Used

- External Communication Form, O-EF 007.A
 - Response Monitoring, O-EF 007.B
- Note:** All forms must be numbered before being completed and filed.

5. Definitions

External Communications: written or electronic correspondence, telephone conversations and verbal discussions or meetings with anyone outside the company.

Stakeholders: Individuals or groups with an interest in the environmental impacts of the Macaé Merchant Power Plant products, activities or services. These stakeholders include regulators, local residents, employees, stockholders, insurers, customers, environmental groups and the general public (adapted from ISO 14001).

6. Exclusions

All external communications regarding emergency situations are addressed in Emergency Communication (O-EP 004).

7. Procedures

Inquiries and other communications (received by mail, fax, telephone or in person) from outside parties concerning the environmental performance of the Plant may be received in a number of different ways but should all be directed to the Plant Manager or the Environmental Coordinator. All such communications must be reviewed at the Plant level to determine the appropriate response, including corporate participation.

Formal communications with representatives of Regulatory Agencies should be conducted by the El Paso Brazilian Environmental Manager. In the absence of this Manager, communications with Regulatory Officials are delegated to the Plant Manager or his designee.

In close cooperation with the El Paso Brazilian Environmental Manager, the Plant Manager or designee is responsible for determining the need for and preparation of any notification to Regulatory Agencies.

Copies of all other written communications on environmental matters are maintained by the Environmental Coordinator. All written and non-written communications from outside parties are documented in the External Communications Form (O-EF 007.A).

The Plant Manager, in consultation with the El Paso Brazilian Environmental Manager, is responsible for handling responses to the media.

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ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN

DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	CONTINUOUS IMPROVEMENT
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MANAGEMENT OF INQUIRIES FROM STAKEHOLDERS

8. Records

The Environmental Coordinator and the El Paso Corporate Environmental Department will maintain records of all external environmental communication with regulatory agencies, stakeholders and the media.

9. Record of Revisions

Revision Date	Description	Sections Affected

DEVELOPED BY	REVIEWED BY	APPROVED BY

ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN

DOCUMENTATION	COMMUNICATION	TRAINING	MONITORING	CONTINUOUS IMPROVEMENT
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PROC. No.:
O-EF 007.A

DOC. No.:

COPY No.
001

PAGE
1 of 1

EXTERNAL COMMUNICATION FORM

REV. No.
001

Date:		Time:	
Type of Contact:	Telephone	e-mail / Letter	Meeting
Other			
Responsible Party:			
Stakeholder: _____			
Tel.: _____ e-mail: _____			
Address: _____			

Environmental Issue / Concern:			

Actions To Be Taken:			

Responsible Parties:			

Date of Completion:			

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