

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Tullow Oil (#27918)

December 10, 2010¹

Item	Action	Completion Indicator	Timetable
TULLOW OIL PLC			
	PS1: Social and Environmental Assessment and Management Systems		
1	Tullow Oil will revise the Risk Management Guidelines and EIA Recommended Practice to ensure that Applicable Projects are assessed and managed according to IFC's Performance Standards.	(a) The Company has submitted draft revised guidelines and practice acceptable to IFC. (b) The Company has provided evidences that any Applicable Project is in compliance with IFC Performance Standards. or has shown that the Applicable Project can come into compliance with the Performance Standards within a reasonable time period following the implementation of an action plan to be agreed upon between the Company and IFC.	(a) Completed. (b) Completed. Facility disbursed only for Jubilee project. (c) Completed
2	Tullow Oil will reconfigure the IMS to ensure that the Head of EHS reviews all Applicable Projects to ensure that they are evaluated and managed according to the IFC Performance Standards.	The Company has submitted a draft reconfigured IMS acceptable to IFC.	(a) Completed. (b) Completed.
3	Training in the IFC's Performance Standards and the applicable IFC EHS Guidelines will be provided to those involved with the risk management of Applicable Projects.	The Company has provided evidence of training and developed a specific training procedure to be included in the Corporate training plan.	(a) Completed. (b) Periodic training sessions discussed in the Annual Monitoring Reports (AMR)
JUBILEE FIELD DEVELOPMENT PROJECT- PHASE 1			
	PS1: Social and Environmental Assessment and Management Systems		

As of October 28, 2010 this Action Plan has been updated to reflect the progress of the Project and the final commitments with the IFC.

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Tullow Oil (#27918)

December 10, 2010¹

Item	Action	Completion Indicator	Timetable
4	The Project will prepare the ESIA for Ghana EPA, incorporating the results of the Environmental Baseline Survey (EBS).	(a) A draft ESIA has been submitted to IFC for review and comments. (b) The final ESIA has been disclosed in Tullow Oil website.	(a) Completed (b) Completed
5	The Project will develop and implement a management of change procedure and Tullow Oil will use reasonable endeavours, by exercising its contractual rights pursuant to any relevant Project Agreements, to ensure that the procedure is part of the Project environmental and social management system (ESMS).	(a) Tullow Oil has submitted the procedure acceptable to IFC. (b) The procedure is integrated in the Project environmental and social management system (ESMS).	(a) Completed. (b) Completed. Integrated into the Project EMP.
6	The Project will have an ESMS that periodically reviews the environmental and social aspects of the Project to determine whether the Environmental Management Plan (EMP) needs to be revised.	(a) The Project has developed an ESMS development schedule and submitted it to IFC. (b) The Project has developed the ESMS for the drilling and installation phase, acceptable to IFC. (c) The Project has developed the ESMS for production operations, acceptable to IFC.	(a) Completed. (b) Completed (c) Ongoing, as per agreed timeline.
7	The Project will disclose the EMP, including this Action Plan, to local communities as it evolves and report on completion of its action items.	(a) Inclusion of a draft EMP disclosure and reporting procedure in the Project's Public Consultation and Disclosure Plan. (b) Disclosure of EMP updates, including this Action Plan, and public disclosure of EMP completion reporting.	(a) Completed. (b) Ongoing. Reporting at least twice per year or per PCDP once it is disclosed.
8	The Project will develop a staffing and training plan to ensure the ongoing management of the project according to the commitments in the ESIA and EMP.	The Project has developed and submitted a draft plan acceptable to IFC.	Completed.

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Tullow Oil (#27918)

December 10, 2010¹

Item	Action	Completion Indicator	Timetable
9	The Project will retain a qualified, independent external expert to verify its environmental and social monitoring information.	The Project has hired a qualified, independent external expert, acceptable to IFC, based on a term of reference agreed by IFC. The Project has publicly disclosed the report of the external expert annually.	(a) Independent expert appointed. (b) First visit January 2010. (c) Subsequent annual independent verification visits.
	PS2: Labor and Working Conditions		
10	The Company will have a Human Resources Policy that communicates to workers their rights under Ghanaian law and spells out terms of employment, including equal opportunity principles, benefits, and leave policies.	(a) The Company has developed and submitted the policy with reference to its own employees, acceptable to IFC. (b) The Company has developed and submitted the policy with reference to non-employee workers, acceptable to IFC.	(a) Completed. (b) Completed.
	PS3: Pollution Prevention and Abatement		
11	The Project will define routine inspection and maintenance of engines, generators, and other equipment, noise, and air emissions monitoring and use of low-sulfur diesel fuel, as part of the Project's environmental monitoring program.	(a) Availability of the Project's environmental monitoring program for the drilling and installation phase, acceptable to IFC. (b) Revised environmental monitoring program for the production operations phase, acceptable to IFC.	(a) Completed. (b) Completed.
12	The Project will maintain a monitoring program for greenhouse gases (GHG).	Periodic public reporting of GHG emissions for the Jubilee Field production operations.	At least yearly reporting.
13	The Project will include drilled cuttings and fluid disposal methods and procedures in the Project's Waste Management Plan. A cuttings deposition model will be developed and included in the Jubilee Field ESIA.	Availability of the cuttings deposition model and the drilled cuttings and fluid disposal methods and procedures, acceptable to IFC.	Completed.

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Tullow Oil (#27918)

December 10, 2010¹

Item	Action	Completion Indicator	Timetable
14	The Project will ensure that a Hydrotest Water Disposal Plan will be prepared.	Availability of the plan, acceptable to IFC.	Completed.
15	The Project will install a produced water discharge sampling point in the FPSO and relevant procedures developed.	Availability of the sampling point and procedures, acceptable to IFC.	Completed.
16	The Project will develop tanker vetting procedures to ensure compliant management of ballast water. Ballast water management measures will be detailed and included in the environmental management system for operations.	Availability of tanker vetting and ballast water management procedures, acceptable to IFC.	Completed.
17	The Company will update the Drilling Waste Management Plan (WMP) to include methods and procedures, adopted by the Project for the management of drilled cuttings and fluid disposal, and all planned activities during facility installation, as needed. An Operations Phase WMP will then be developed. Audits of the waste management facilities regularly conducted. The Chemical Handling (COSHH) Procedure will be implemented to handle all hazardous chemicals and the Company will ensure that it is adopted by its contractors.	(a) Availability of a draft Project's WMP (b) Availability of a draft Project's management plan for drilled cuttings (c) Chemical Handling (COSHH) Procedure for the drilling and installation phase, acceptable to IFC. (d) Waste Management Plan and Chemical Handling (COSHH) Procedure for the production operations phase, acceptable to IFC.	(a) Completed. (b) Completed. (c) Completed. (d) Received Revision 0 for Ghana EPA submission, June 2010. Ongoing review of Revision 1.
18	The Project will update the existing Emergency Response Plan (ERP), to include response procedures to emergencies potentially associated to all construction and production operations activities planned, including fire prevention and protection, environmental emergencies, and other incident responses.	(a) Availability of a draft Project's ERP for the drilling and installation phase, acceptable to IFC. (b) ERP for the production operations phase, acceptable to IFC.	(a) Completed (b) . Ghana Incident Management Plan Revision 2 received, acceptable to IFC.

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Tullow Oil (#27918)

December 10, 2010¹

Item	Action	Completion Indicator	Timetable
19	Quantitative modeling of defined potential surface and subsurface oil spill release scenarios will be conducted and an assessment of potential for oil spill related impacts to offshore and coastal environmental resources, including turtle nesting beaches, will be conducted for both the drilling/installation phase and the production operations phase, and incorporated in the Oil Spill Contingency Plan (OSCP). The OSCP will define specific measures for protecting turtle habitat and other protected and sensitive coastal habitats. The Project will develop spill scenarios for the operations phase Oil Spill Contingency Plan (OSCP).	(a) Availability of the Project's OSCP for the drilling and installation phase, including the spill trajectory model, acceptable to IFC. (b) OSCP for the production operations phase, acceptable to IFC.	(a) Completed. (b) OSCP Revision 1 received, acceptable to IFC.
20	The Project will develop and adopt a H2S Program and ensure that it is also adopted by its contractors, as needed.	Availability of the Project's H2S Program, acceptable to IFC	Not applicable.
	PS4: Community Health, Safety and Security		
21	(a) The Project will develop a program to avoid intrusion into the safety zones around the drilling rigs and FPSO to include: Education program for the nearby villages and other fishers known to use the project area. (b) Procedure for boat traffic management and for warning boats away from the safety zone, including rules of engagement for use of physical intervention.	(a) Education program information and schedule for meeting with villages. (b) Procedures for offshore facilities provided to and accepted by IFC. (c) Procedures for managing traffic into and out of Takoradi harbor.	(a) Program ongoing. (b) Completed. (c) Tullow follows Africa Pilot for Takoradi Harbor, acceptable to IFC.

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Tullow Oil (#27918)

December 10, 2010¹

Item	Action	Completion Indicator	Timetable
	(c) The Project will develop a security plan, based on a security risk assessment, which may include, among other things, the adaptation of the US-UK Voluntary Principles on Security.	(d) Security Plan provided to and accepted by IFC.	(d) Completed.
	PS6: Biodiversity Conservation and Sustainable Natural Resource Management		
22	The Project will develop and implement a program for training vessel's and helicopter's operators in marine mammal observation and monitoring at and in the vicinity of the proposed Jubilee Field development. The program will be included in the final Jubilee ESIA and developed in consultation with the Ghana EPA.	(a) Availability of the program, acceptable to IFC. (b) Observations analyzed by an experienced marine mammal biologist and reported in the annual monitoring report to IFC.	(a) Completed. (b) At least yearly reporting.
23	The Project will develop and enforce a specific policy and procedures to ensure that traffic and operations of drilling vessels, support vessels and helicopters will minimize disturbance to marine mammals.	Availability of the policy and procedures, acceptable to IFC	Completed.
24	The Project will ensure that support helicopters will routinely avoid flying over the Amansuri wetland and that, if avoidance is not feasible due to weather conditions, a minimum altitude will be specified, according to international good practice, when flying over this area to minimize disturbance to wildlife.	Availability of the policy and procedures, acceptable to IFC	Completed.