

BRAZIL: CONSTELLATION (#28512)

ENVIRONMENTAL AND SOCIAL ACTION PLAN

No.	Issue	Proposed Actions	Indicator of Completion	Completion Date
1	Construction of new drilling rigs and FPSOs	- Conduct HSE review of potential construction contractors (shipyards) before awarding each construction contract; - Conduct HSE review of shipyards during construction of contracted drilling rigs and FPSOs; frequency to be determined based on the results of initial review.	HSE review report is provided to IFC HSE review reports are provided to IFC	Before start up of construction Per agreed frequency during construction process
2	Screening of projects for applicable IFC Performance Standards and developing necessary mitigation measures	As a part of Environmental and Social Management System (ESMS): (i) conduct screening and gap analysis (based on project TOR, ESIA's and other documentation) of all future drilling projects for the following IFC Performance Standards: - PS5: Land Acquisition and Involuntary Resettlement; - PS6: Biodiversity Conservation and Sustainable Natural Resources Management; - PS7: Indigenous peoples; - PS8: Cultural Heritage. (ii) develop environmental and social risk mitigation measures in accordance with the requirements of PS 5, PS 6, PS 7, PS 8 if they are found applicable to the project.	Screening report for PS 5-8 is provided to IFC for each new drilling project Mitigation plan for PS 5-8 is provided to IFC for each drilling project where they are applicable	At least 1 month before start of the project At least 1 month before start of the project
3	Environmental, Health and Safety Management System (EHSMS)	(i) Demonstrate compliance with the EHSMS Implementation Program. (ii) Establish and implement an EHSMS Audit Program.	IFC receives copy of the Integrated (EHSMS) certification audit Copy of the annual EHSMS internal Audit Program	January 2010 Two months after end of each

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			documents provided to IFC	year
4	Health and safety management	Complete environment, health and safety aspects and impacts studies and risk assessments for each new rig and FPSO.	Reports of the studies provided to IFC (in English).	Two months before commissioning of each offshore unit
5	Drilling rig and FPSO transportation	Develop a EHS management plan for the shipping phase of each off-shore unit	EHS plan is provided and agreed with IFC	Upon completion of construction of each unit
6	Emergency Preparedness and Response	(i) Develop an emergency response, accident and fire safety plans for each new offshore unit. (ii) Develop a spill contingency plan that will cover oil/condensate, diesel and chemical spill prevention and spill response measures for each new offshore activity.	Both plans are provided and agreed with IFC	Two months before commissioning of each off-shore unit
7	Decommissioning	Develop a plan for the decommissioning of each drilling unit and FPSO	Report provided information about possible disposal Plan is provided and agreed with IFC	Before signing contract Up to one year before the end of life time of the rigs
8	Stakeholder Engagement and Development	- Develop annual stakeholder engagement and development plans as per Social Responsibility Strategy; - Prepare annual stakeholder development reports based on the implementation of annual Plans.	Plan is provided to IFC Report is provided to IFC	Three months after year start Three months after year end