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Trada Maritime (#29186)
Environmental and Social Action Plan (ESAP)

Environmental and Social Management System		Action	Deliverable	Due Date
1.	EH&S Position at Corporate Level Trada will hire an experienced senior individual with responsibility and authority to deliver all environmental, social, health and safety (ESHS) and labor matters across all assets at The Company. The individual's role will be clearly defined, including a written job description, and sufficient management authority and resources will be provided to ensure compliance with relevant and applicable laws and regulations. The individual will ensure consistency with good international industry practice for ESHS performance and maintain compliance with all regulatory and IFC requirements, prior to and beyond implementation of a certification regime. (i) Create position and advertise with Terms of Reference; and (ii) Employed/ In post (iii) Engage consultant to perform HSE manager duties during the recruitment cycle of HSE manager. (Not required should the HSE manager position be filled prior to action item 'Due Date')		Documentary Evidence - Position creation - Reporting line - Hiring notice	(i) Condition of Disbursement (COD) (ii) August 1 st , 2010 (iii) May 1 st , 2010
2.	Certification of Management Systems Trada is currently working on achieving the following certification: (i) ISO 14001 for Environmental Management Trada currently operate the following Management Systems, which require renewal by year (2010) end: (ii) ISO 9001 for Quality and (iii) OHSAS 18001 for Occupational Health and Safety		Documentary Evidence - ISO 14001 pre-certification by an Accredited Agency - ISO 14001 certification by an Accredited Agency. - Certification by an Accredited Agency	(i, a) Dec 31 st , 2010 (i, b) June 30 th , 2011 (iv) Feb 1 st , 2011 (v) Jan 1 st , 2011
3.	Integrated Environmental and Social Management System Trada will implement an integrated ESHS management system to provide continued oversight of ESHS for all its operations and those of its subcontractors. The management system must ensure consistency with good international industry practice for ESHS performance and maintain compliance with all regulatory and IFC requirements. Specifically, the Management system must include (but not limited to): (i) Adopt IFC Performance Standards (PS 1 through PS 8) and relevant EHS Guidelines as formal requirements for its operations, (ii) Incorporate IFC Performance Standards requirements into FSO conversion design, (iii) Integrated OHS functions – training, monitoring, and reporting,		Documentary Evidence - Operating Procedure and Policy - Procedures on Community Engagement - FSO Conversion Environmental Basis of Design - Waste Management Plan - Change of Custody	(i) COD (ii) – (vii) Dec 31, 2010

	(iv) Procurement procedures to provide oversight and contractually require that its suppliers and subcontractors comply with national regulatory requirements and Trada's ESH&S policies. (v) Procedures for communicating environmental and social aspects to external interested parties, including clear procedures for receiving, documenting and responding to concerns from any external interested parties relating to the project. (vi) Develop a plan for the decommissioning of FSO consistent with recognized international industry best practice. (vii) develop an integrated waste management plan for all hazardous and non-hazardous wastes generated on the FSO, including an auditable change of custody procedure for removal of waste from the vessel through to a licensed disposal facility.	Procedure and ongoing records	
4	Permitting and Vessel Classification Provide IFC with permits to operate and relevant classification documentation, ahead of commencement of contract.	Documentary Evidence (i) Field/ Concession AMDAL permitting approval (ii) Lloyds Register classification (iii) BKI Classification (iv) Seacom Permit to operate	(i) COD (ii) - (iv) Jan 1st, 2011
Labor and Working Conditions			
5.	Occupational Health and Safety Review with external assistance Trada's OHS policies, procedures and training program for consistency with good international industry practice with an emphasis on (a) on-board safety, (b) oversight of subcontracted operations, including the FSO conversion design and conversion activities, and (c) working and living conditions for any labor employed by Trada, either directly or through sub-contractors. Specific milestones are: - Retain qualified engineering consultancy to develop a Safety Case (ToR to be developed in consultation with IFC) - Implement recommendations from consultant review.	Documentary evidence (i) Engineering Consultancy ToR (ii) Contract for works (iii) Reasonable 1st draft of Safety Case (iv) Actions close-out and summary of works report	(i) COD (ii) COD (iii) COD (iv) Dec 31st, 2010
6.	Worker Grievance Mechanism Develop a worker grievance mechanism which includes a system for regular formal interaction between Trada senior management and elected staff representatives and/ or union representatives in line with IFC Performance Standards.	Documentary evidence (i) Grievance mechanism	(i) 31st December, 2010
Pollution Prevention and Abatement			
7.	Discharge of Treated Process and Sanitary Wastewater and Stormwater Performance Guarantee from Supplier/Vendor of Treatment System. Validation of adequacy of wastewater treatment system to meet consistent compliance with local regulatory requirement and IFC guidelines for the direct discharge of treated wastewater to marine waters. Specifically,	Documentary evidence (i) Legally binding Performance Guarantee from Supplier/Vendor, Fiscal	(i) COD

	the wastewater from ALL treatment plants have to meet effluent discharge standards that are better than or equal to those required for compliance and consistent with recognized international industry best practice (such as those specified by MARPOL or equivalent).		Allocation, Training Budget and Equipment Commissioning Date	(i) June 30 th , 2010 (ii) August 1 st , 2010 (iii) Jan 1 st , 2011
8.	Asbestos Management Identify and ensure any asbestos containing materials (ACMs) are managed/ removed as required by commencement of contract on January 1st, 2011. Specific work-streams are: (i) Engage a qualified external consultant to undertake a detailed asbestos survey of the Lentera Bangsa consistent with recognized international industry best practice. (ii) As required, retain a qualified external consultant to develop a vessel asbestos management plan consistent with recognized international industry best practice. (iii) Undertake a corrective actions close-out survey upon completion of works (as required) consistent with recognized international industry best practice.		Documentary evidence (i) Asbestos survey report by a qualified independent asbestos consultant (ii) Asbestos Management Plan undertaken by a qualified independent asbestos consultant [as required by point (i)] (iii) Corrective actions close out survey and report by a qualified independent asbestos consultant [as required by point (ii)]	
9.	Emergency Preparedness and Response Procedures Trada will review and update its procedures, training and infrastructure to ensure safe operations and emergency response associated FSO operations. Updated procedures must include a <u>community involvement component</u> that addresses communication of risk, appropriate behavior, and safety measures to be implemented in an emergency. Specific milestones are: (i) Retain Consultant (TOR to be developed in consultation with IFC) (ii) Completion of review by consultant and allocation of resources (iii) Implement recommendations from consultant review.		Documentary evidence (i) Copy of Contract (ii) Consultant Review and Recommendation (iii) Updated procedures and implementation plan with resource (management + fiscal) allocation	(i) – (iii) Dec 31 st , 2010
Community Health, Safety and Security				
10.	Grievance Mechanism Establish a grievance mechanism relating to its activities in fulfilling the contract and impacts of its operations on local communities. A plan of periodic communication with local fishermen and coordination of offshore activities will be prepared for the FSO operations, in coordination with CNOOC.		Documentary evidence (i) Grievance Mechanism Procedure (ii) Grievance log (iii) Records of communications with local fishermen	(i) Dec 31 st , 2011, (ii) – (iii) Yearly (as part of Annual Monitoring Report)