

Eleme: Environmental and Social Action Plan (ESAP): October 2012		
No.	Action	Timetable
Performance Standard 1: Social and Environmental Assessment and Management System		
1.	Complete an environmental impact assessment ("EIA") for the pipeline compliant with national requirements and IFC's Performance Standards.	Prior to construction.
2.	Obtain regulatory approval for the individual EIA's being undertaken for the respective project components (fertilizer plant, jetty and pipeline).	Prior to construction.
3.	Develop and implement a project specific environmental and social management system ("ESMS") inclusive of related management plans for the construction phase associated with the fertilizer plant, jetty and pipeline that are compliant with Performance Standard 1. This is to define and document: • Eleme and the EPC contractor's roles and responsibilities related to the management of environmental and social issues and occupational health and safety ("OHS"); • The plans inclusive of; i) associated procedures / work instructions related to the management of social and environmental issues and OHS and; ii) relevant mitigation measures defined in the project environmental impact assessments and other relevant studies to be undertaken as defined in this ESAP e.g., Marine Dredging Plan; • The approach inclusive of monitoring to ensure that EPC contractor and sub-contractors comply with the requirements of Performance Standard 2: Labor and Working Conditions, and compliance with the project's requirements and the project ESMS and associated management plans; • The responsibilities and approach to monitoring and reporting on compliance with the ESMS including requirements on expatriate workers accommodation (refer action item No.10); and • Training requirements to facilitate implementation of the above.	Prior to construction.
4.	Contractually require compliance with the project ESMS by the EPC contractors and sub-contractors.	Prior to construction.
5.	Develop and implement an emergency response plan for the	Prior to commissioning.

	Fertilizer Plant, Jetty and Pipeline that is integrated into the existing response plan for the facility and other operators as necessary (i.e., NPA and NAOC). The plans are to include community consultation as applicable, along with relevant measures for warning the communities.	
6.	Develop and implement an Integrated Management System ("IMS") aligned with the requirements of Performance Standard 1 and Eleme's existing IMS for operations at the Fertilizer Plant and Jetty.	6 months following project commissioning.
7.	Undertake the following hazard and operability ("HAZOP") studies for the Fertilizer Plant: a) Preliminary HAZOP; b) HAZOP on completion of design engineering; c) HAZOP focused on deviations from design engineering; d) A Pre-Startup Safety Review (PSSR) with qualified experts from the technology and engineering companies.	a) Prior to construction. b) August 2013. c) November 2013. d) Before commissioning.
8.	Develop and implement a consolidated stakeholder engagement plan (SEP) for all operations within the facility including the fertilizer plant, jetty and pipeline which; i) covers the lifecycle of all activities; ii) states the stakeholder engagement roles of the EPC Contractor, sub-contractors, the Sponsor, the Community Liaison Officer and the Project Advisory Committee and; iii) includes a community grievance mechanism.	Prior to construction.
Performance Standard 2: Labor and Working Conditions		
9.	Contractually require each EPC contractor to comply with requirements of Performance Standard 2 and define and implement a schedule and associated reporting plan to regularly confirm compliance of the EPC contractor and sub-contractors with Performance Standard 2.	31 March 2013. Submission of reports as per agreed schedule.
10.	Develop and implement an expatriate workers accommodation plan for the Fertilizer Plant and jetty compliant with IFC's requirements.	Prior to construction.
Performance Standard 3: Pollution Prevention and Abatement		
11.	Undertake a noise impact assessment for the Fertilizer Plant and jetty respectively and implement mitigation measures as required.	Prior to construction. Implementation of mitigation measures assessed during project review.
12.	Develop and implement a Dredging Management Plan to assess / mitigate potential contamination of sediments by	Prior to construction.

	dredging activities during jetty construction The baseline ecological assessment inclusive of the assessment of impacts as defined under No. 16 must be used as a basis for compilation of this Plan.	
13.	Update the Traffic Management Plan to include mitigation measures associated with the jetty operations.	Prior to construction.
Performance Standard 4: Community Health, Safety and Security		
14..	Confirm pipeline operations comply with best practice in respect of community health and safety.	Prior to commissioning the pipeline.
Performance Standard 5: Land Acquisition and Involuntary Resettlement		
15.	In the event that physical or economic displacement is required for construction of the pipeline, confirm and agree with IFC on the approach prior to displacement occurring.	Prior to displacement occurring.
Performance Standard 5: Biodiversity Conservation and Sustainable Management of Living Resources		
16.	Update existing baseline assessment / data on marine environment and assess impacts on ecology as a result of the dredging and construction of the jetty.	31 March 2013.