

Offshore Cape Three Points Environmental and Social Monitoring – Review of 2019 AMR, Q1 2020 QMR and Q2 2020 QMR

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OFFSHORE CAPE THREE POINTS ENVIRONMENTAL AND SOCIAL MONITORING – REVIEW OF 2019 AMR, Q1 2020 QMR AND Q2 2020 QMR

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ENVIRONMENTAL AND SOCIAL MONITORING –
REVIEW OF 2019 AMR, Q1 2020 QMR AND Q2 2020
QMR**

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Appendix 1

Environmental and Social Action Plan

Appendix 2

Status of 'Open' Issues (End Q2, 2020)

GLOSSARY OF TERMS/ ACRONYMS

Acronym	Abbreviation
ACA	Additional Conservation Action
AG	Associated Gas
AoI	Area of Influence
AMR	Annual Monitoring Report
BAP	Biodiversity Action Plan
BMP	Biodiversity Management Plan
DAoI	Direct Area of Influence
E&S	Environmental and Social
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
EHS	Environmental, Health and Safety
EPA	Environmental Protection Agency
ESMS	Environmental and Social Management System
DEQ	DEQ Change Foundation
ESL	ESL Consulting
FMCC	Fisheries Management Coordination Committee
FMP	Fisheries Management Plan
FPSO	Floating Production Storage and Offloading Vessel
GNGC	Ghana National Gas Company
GNPC	Ghana National Petroleum Corporation
GWS	Ghana Wildlife Society
HSE	Health, Safety and Environment
IBA	International Bird and Biodiversity Area
IDA	International Development Association (World Bank)
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
LRP	Livelihood Restoration Plan
LTI	Lost time incident
MIGA	Multilateral Investment Guarantee Agency
mmscf	Million standard cubic feet
MMSTPPP	Marine Mammal and Sea Turtle Protection Policy and Plan
MoC	Management of Change
MoU	Memorandum of Understanding
NAG	Non-Associated Gas
O&G	Oil and Gas
OCTP	Offshore Cape Three Points
ORF	Onshore Receiving Facility
PAPs	Project-Affected Persons (by land acquisition)
PS	Performance Standard
QRA	Quantitative Risk Assessment
QMR	Quarterly Monitoring Report
SEQ	Safety, Environment and Quality
SLC	Sustainability & Local Content
STP	Sewage Treatment Plant
TNS	TechnoServe

TPH	Total Petroleum Hydrocarbon
TTIP	Takoradi to Tema Interconnection Project
TSP	Total Suspended Particulates
Vitol	Vitol Exploration and Production Limited
VUGL	Vitol Upstream Ghana Limited
WAPCo	West African Pipeline Company
WB	World Bank
WBG	World Bank Group

EXECUTIVE SUMMARY

Ramboll Environment and Health UK Limited (Ramboll) was commissioned in January 2017 by Vitol Upstream Ghana Limited (VUGL) to undertake environmental and social monitoring of the Offshore Cape Three Points (OCTP) project (the 'Project'), Republic of Ghana. The Project is operated by Eni Ghana Exploration and Production Ltd (Eni Ghana). VUGL, an affiliate of Vitol Exploration and Production Limited (Vitol), and Ghana National Petroleum Corporation are JV non-operating partners. Ramboll has a duty of care towards the World Bank Group (WBG).

Ramboll's scope of work requires periodic site visits to assess the Project's compliance with agreed environmental and social requirements. However, a monitoring trip originally planned for early 2020 was initially delayed in anticipation of Project Completion¹, to allow for issuance of a completion certificate. More latterly, as a consequence of travel restrictions resulting from the global COVID-19 pandemic, the Ramboll team has been unable to travel from the UK to Ghana. The team intends to travel to Ghana once travel restrictions are lifted but in the interim, it has been agreed that a desk-based review will be conducted. This report therefore presents findings from Ramboll, acting in the role of Independent Environmental and Social Consultant (IESC) for the Project, following a review of the Project's: i) 2019 Annual Monitoring Report (AMR); the Q1 2020 Quarterly Monitoring Report (QMR); and the Q2 2020 QMR and additional documents embedded within each of these documents.

The findings presented in this report are based largely on a desk-top review of the afore-mentioned reports produced by the Project, plus a number of conference calls and exchanges with Eni Ghana Safety, Environment and Quality (SEQ) and Sustainability & Local Content (SLC) representatives intended to augment the IESC's understanding of the Project's current status. Additionally, these calls prompted requests for further information and subsequent provision of additional documentation not previously embedded within the AMR and QMRs.

The IESC's previous monitoring report was for the period up to Q2 2019, thus this report covers the period since the last report (Q2 2019) through to end of Q2 2020. Within this report, the IESC provides status updates against the 'open' issues identified in the IESC's preceding report, in this case the Q2 2019 QMR monitoring report (itself based on the findings from an earlier May 2019 site visit report and findings carried over from other earlier reports). The IESC has provided updates, where possible, for issues previously identified within the previous reports.

In previous reports the IESC has reported on a broad range of issues, reflecting the complexity of a large-scale construction project. With a progressive transition to the production phase, involving completion of all construction and demobilisation of the drill ship, emphasis is placed on ongoing production-related impacts including longer-term livelihood restoration for land-affected people and biodiversity monitoring/mitigation/offsetting efforts.

In several areas, progress against management plans has been delayed in 2020 as a result of the COVID-19 pandemic. Such instances, including environmental (including biodiversity) monitoring, restoration/revegetation of disturbed areas, livelihood restoration and community investment initiatives, are described within the report.

Key findings from this review are provided below.

Annual reporting/AMR content

As a general finding, there should be stricter adherence to the AMR template and additional commentary in certain sections. Additional information would have been particularly helpful during the preparation of this report because of the extra reliance placed on the AMR/QMRs resulting from the current travel

¹ The IESC is required to issue a completion certificate confirming the Project has been constructed and is operating in compliance with the ESAP and applicable standards. The intention is to issue the Completion Certificate following an on-site inspection. Following issuance of the Completion Certificate, the frequency of monitoring will be reduced to annual site visits.

restrictions imposed as a result of the COVID-19 pandemic (see GHG emissions, wastewater effluent and biodiversity below). The IESC also recommends a review of the reporting template's content, noting the changed nature of the Project and a shift in priority areas following the full transition away from construction and drilling activities.

SEQ/SLC resources

The HSE and SLC teams were restructured following full transition to Production. Several positions are vacant within the Safety, Environment and Quality team, including the HSE Operations Coordinator. The vacant HSE Operations Coordinator post is a result of a recent departure and a replacement is expected by earlier 2021. This post, in particular, would appear to be important for HSE performance; the WBG and the IESC should be informed of any interim measures in place whilst the post is vacant in addition to actions being undertaken to fill this and other posts. Formally, as per the SLC organogram the number of LRP Delivery Officers has been reduced from 3 to 2. However, Eni Ghana clarified that, since the beginning of 2020, the Fisheries Management Plan Delivery Officer has supported the LRP Delivery Officers.

Cumulative impacts

An Inception Report was prepared in accordance with a Term of Reference developed by the IFC, to facilitate agreement on the design of a Cumulative Impact Co-management Platform. Fundamental issues, relating to: i) Steering Committee disagreement regarding which entities should be party to the platform; and ii) funding of the platform and any substantive mitigation activities remain unresolved, are hampering the efforts of key public and private stakeholders to co-manage cumulative impacts. The IESC has been informed that Eni Ghana remains committed in its support the co-management platform pending resolution of the afore mentioned issues by the Steering Committee.

ESAP deliverables

Certain plans are still to be finalised, including revision/development of the following biodiversity related plans: the updated Avian Biodiversity Action Plan; the updated Sea Turtle Biodiversity Action Plan; and the Wetlands No Net Loss Strategy. The IESC considers such plans to form part of the ESHMP and for this reason considers item 1e) of the ESAP to remain 'open'.

Surface water quality

Closer attention should be given to the information requested in the AMR reporting template, noting that data provided to the Environmental Protection Agency (EPA) is requested and therefore should be included in future AMRs.

Community Grievances

LRP-related documents embedded in the 2019 AMR and the Q1 and Q2 QMRs 2020 provide information on the grievances managed by Eni Ghana and those managed by TechnoServe (TNS), the LRP Support Services implementing partner. Previously, data on grievances managed by TNS (restricted to LRP-related grievances) were not supplied in AMRs/QMRs. It is recommended that Eni Ghana record, in AMRs/QMRs, all grievances received by the Project (either by Eni Ghana or any of its contractors) - whether escalated by contractors or not - in the same manner that grievances received by Eni Ghana are recorded currently.

Four fishery-related grievances appear still to be unresolved and therefore are open (one has been open for a long time – just over 1 year). It is recommended that, if agreement has not been reached on an action to resolve the grievance by end 2020, Eni Ghana proposes to the FMCC that an independent external party be involved to assess the grievance and propose a way forward.

Community Investment Strategy: Quick Impact Projects

With respect to the educational project; there have been delays to a) the capacity-building component and b) the infrastructure component has not yet started. Recommendations are:

- a) Lead for Ghana (LfG), the implementing partner for the capacity-building component, updates regularly, its COVID-19 Plan in line with new government measures/restrictions to enable the project to minimize adverse educational impacts from COVID-19. Once, all measures/restrictions are removed then Eni Ghana and LfG should evaluate and then agree actions, as necessary, to facilitate a 'catch up' in the shortest possible time period; and
- b) Eni Ghana work closely with the selected contractor to reduce any delays related to acquiring the requisite permissions for managing the necessary removal of asbestos during building works.

Fishery-based Incursions into FPSO Offshore Exclusion Zone

Cumulative totals of incursions for Q3 and Q4 2019 and the totals to date for end June 2020 (with extrapolation for the year 2020) highlight the continuing challenge posed by fishing boat incursions into the FPSO offshore exclusion zone² and the need for Eni Ghana to continue its efforts to reduce the number of incursions. Eni Ghana should continue its monitoring efforts and it is recommended that it extends its analysis and reporting, in both QMRs and AMRs, to encompass trends in the number of incursions (taking seasonal effects into account), data on the origin of vessels entering the FPSO exclusion zone (including ownership details), in addition to presenting cumulative totals for defined time periods. In addition, the IESC reiterates its previous recommendations that Eni Ghana continues to seek effective means of reducing incursions and documents their efforts in the QMRs and AMRs.

Tema Regulating Metering Station (RMS)

The Tema RMS was redesigned, with lower gas pressure relative to an initial design, to address earlier concerns about potential fire and explosion risk to neighbouring residents. A Quantitative Risk Assessment study confirmed that no residential properties were located within in the 'intolerable risk' zone. The study recommended a number of good practice measure to further reduce risk, but does not recommend the resettlement of nearby residents.

Livelihood Restoration

There are significant challenges facing Eni Ghana's efforts to restore livelihoods, prior to the ending of the LRP Support Services component of LRP implementation, in February 2021. Given the uncertainty created by COVID-19 and the reliance on third parties such as the electricity provider, it is recommended that Eni Ghana reinforce its efforts to assist those PAPs not generating any revenues and, also, consider preparing an LRP Exit Strategy, for ensuring livelihood restoration for PAPs if future monitoring and evaluation results show that the objective of livelihood restoration cannot be achieved by end January 2021³.

Ambient Air Quality

The QMR summarises ambient air quality results for NO₂, SO₂, PM₁₀ and Total Suspended Particulates. Monitoring results typically show ambient air quality to be below Ghanaian and WBG standards with some exceptions for PM₁₀ and SO₂ in the vicinity of the Onshore Receiving facility (ORF). As previously reported, the SO₂ exceedances are marginal, with the more significant exceedances tending to be in the villages of Sanzule and Anwolakrom. This is consistent with earlier observations and Eni Ghana's earlier explanation that the ongoing high concentrations are likely due to localised biomass burning and community vehicles' exhausts.

² Incursion data in the 2019 AMR and the 2020 QMRs refer only to the FPSO exclusion zone.

³ The Environmental and Social Action Plan indicates that an independent Completion Implementation Audit will be undertaken 1 year following completion of LRP implementation (See Appendix 1).

Air emissions

The current AMR and QMR reporting templates require the reporting of significant emission from all facilities. The IESC has previously reported that emissions are not reported in a manner that allows comparison with WBG emission guidelines. Furthermore, emissions sources reported for the ORF site are the same as for construction. Eni Ghana should review major emission sources for the Production Phase, including power generation and compressor system emissions at the ORF, and report these in the format specified in AMR and QMR templates. Eni Ghana should also demonstrate that emissions from significant emission sources are in alignment with applicable limits specified in the WBG EHS Guidelines. In order to demonstrate emissions are aligned with WBG EHS guidelines, stack emissions sampling is likely to be required.

Biodiversity

The 2019 AMR and 2020 QMRs do not provide information that allows the status of the seven biodiversity issues identified in the previous site visit report to be changed. The Avian and Sea Turtle Biodiversity Action Plans (BAPs) for the Production Phase are in the process of being finalised and the actions therein may differ from the existing BAP actions which have informed the current review. For this reason, no new issues have been opened relating to BAP actions at this time.

Although not reported in the AMR or QMRs, it is understood that an initial strategy of achieving No Net Loss (NNL) of wetlands through on-site habitat restoration, and potentially averted loss or restoration off-site offsets, has been developed and it is apparent from conversations with Eni Ghana that further refinement of the strategy is ongoing. When this strategy is available for review the IESC will seek confirmation that areas affected by Livelihood Restoration are considered in the calculations.

The 2019 AMR reports that the plant nursery at the ORF was managed effectively, which is supported by the IESC's earlier visits to the nursery. Although not reported in the 2019 AMR or 2020 QMRs, monitoring of girth and height for ten representative nursery transplants in the ORF revegetation plots has been conducted in the reporting period, as indicated in a Revegetation and Alien Invasive Species report (November 2020) provided by Eni Ghana. The results generally indicate that transplanted seedlings are establishing well and growing as expected. The Revegetation and Alien Invasive Species report provides this limited information for the 2019 and Q1 2020 period; instead, it principally focuses upon the Q2 2020 monitoring which was postponed until September 2020 due to the COVID-19 pandemic. Eni Ghana have indicated that quarterly monitoring of flora including alien invasive species will be conducted going forward.

The status of some marine biodiversity monitoring actions, including those from the Marine Mammal and Sea Turtle Protection Policy and Plan (MMSTPPP), as referenced in the Production Phase Biodiversity Management Plan, requires clarification. The 2019 AMR and 2020 QMRs do not currently include reporting against the management measures relating to sightings and incident reporting for marine mammals and sea turtles at sea from supply vessels, though it is understood from Eni Ghana that incidental sightings were made and that marine biodiversity monitoring, including sighting and incident reporting for marine mammals and sea turtles at sea, will continue into 2021.

1. INTRODUCTION

Ramboll Environment and Health UK Limited (Ramboll) was commissioned in January 2017 by Vitol Upstream Ghana Limited (VUGL) to undertake environmental and social monitoring of the Offshore Cape Three Points (OCTP) project (the 'Project'), Republic of Ghana. The Project is operated by Eni Ghana Exploration and Production Ltd (Eni Ghana). VUGL, an affiliate of Vitol Exploration and Production Limited (Vitol), and Ghana National Petroleum Corporation (GNPC) are JV non-operating partners.

In fulfilling the role of Lenders' Independent Environmental and Social Consultant (IESC), Ramboll has a duty of care to a consortium of lenders (the 'Lenders') to the Project, including the International Finance Corporation⁴ (IFC), World Bank⁵ (International Development Association) and the Multilateral Investment Guarantee Agency⁶ (MIGA) which is also a member of the World Bank Group (WBG).

In carrying out its duties as the IESC, Ramboll is required to participate in monitoring site visits and undertake desk-top review of the Project's Annual and Quarterly Environmental and Social Monitoring reports, submitted by VUGL and Eni Ghana to the Lenders.

Ramboll's scope of work requires periodic site visits to assess the Project's compliance with agreed environmental and social requirements. However, a monitoring trip originally planned for early 2020 was initially delayed in anticipation of Project Completion⁷ to allow for issuance of a completion certificate. More latterly, as a consequence of travel restrictions resulting from the global COVID-19 pandemic, the Ramboll team has been unable to travel from the UK to Ghana during this reporting period. The team intends to travel to Ghana once travel restrictions are lifted. In the interim, it has been agreed that a desk-based review will be conducted in place of the planned site visit. This report therefore presents findings from Ramboll, acting in the role of Independent Environmental and Social Consultant (IESC) for the Project, following a review of the Project's: i) 2019 Annual Monitoring Report (AMR); the Q1 2020 Quarterly Monitoring Report (QMR); and the Q2 2020 QMR and additional documents embedded within each of these documents.

This report covers the period since the last report (Q2 2019) through to end of Q2 2020. Within this report, the IESC provides status updates against the 'open' issues identified in the IESC's preceding report, in this case the Q2 2019 QMR monitoring report (itself based on the findings from an earlier May 2019 site visit report and findings carried over from other earlier reports).

This desk-top review is one of a series of reports written by the IESC and has three primary objectives:

1. Provision of a status update on issues identified in the previous reports, listed in the table below;
2. Highlighting any significant new findings resulting from the Project's operations since the previous report; and
3. Updating the status of Environmental and Social Action Plan (ESAP) compliance, for example, where an ESAP delivery date coincides with the reporting period.

Previous reports produced by the IESC are listed below.

⁴ Lender to VUGL debt financing package.

⁵ Guarantor to support the gas development.

⁶ Insurer for commercial lenders to VUGL.

⁷ The IESC is required to issue a completion certificate confirming the Project has been constructed and is operating in compliance with the ESAP and applicable standards. The intention is to issue the Completion Certificate following an on-site inspection. Following issuance of the Completion Certificate, the frequency of monitoring will be reduced to annual site visits.

Table 1: List of IESC monitoring reports

Report title	Site visit/desk-top review	Reporting period	Date of Issue
Offshore Cape Three Points Environmental and Social Monitoring Report – Q2, 2019 QMR	Desk-top	1 st April to 30 th June 2019	November 2019
Offshore Cape Three Points Environmental and Social Monitoring Report (status in May 2019)	Site visit	19 May to 23 May 2019	July 2019
Offshore Cape Three Points Environmental and Social Monitoring – Q4, 2018 QMR	Desk-top	1 st October to 31 st December 2018	April 2109
Offshore Cape Three Points Environmental and Social Monitoring – Q3, 2018 QMR	Desk-top	July 2018 to September 2018	February 2019
Offshore Cape Three Points Environmental and Social Monitoring Report (status in September 2018)	Site visit	17 September to 21 September 2018	December 2018
Offshore Cape Three Points Environmental and Social Monitoring – Q1 and Q2, 2018 QMR	Desk-top	January 2018 to June 2018	October 2018
Offshore Cape Three Points Environmental and Social Monitoring Report (status in March 2018)	Site visit	16 September to 16 March 2018	July 2018
Offshore Cape Three Points Environmental and Social Monitoring – Q3, 2017 QMR	Desk-top	June 2017 to September 2017	December 2017
Offshore Cape Three Points Environmental and Social Monitoring Report (status in September 2017)	Site visit	21 February 2017to 15 September 2017	November 2017
Offshore Cape Three Points Environmental and Social Monitoring – Q1, 2017 QMR	Desk-top	January 2017 to March 2017	June 2017
Offshore Cape Three Points Environmental and Social Monitoring Report (status in February 2017)	Site Visit	Period up to 20 th February 2017	May 2017

2. SCOPE AND STRUCTURE OF THE REPORT

This report follows a similar format to that used for the previous IESC monitoring reports. Project performance is assessed against the Project's environmental and social management system (ESMS), including a suite of Project-specific management plans, as amended, that were developed to satisfy agreed Project Standards. The findings presented in this report are based on review of the Eni Ghana 2019 AMR, Q1 2020 QMR and Q2 2020 QMR, all of which are based on reporting templates provided by the WBG.

2.1 Project Standards

In accordance with the IESC's Terms of Reference, the Project is being assessed against the following standards and guidelines:

- Applicable laws and regulations of Ghana;
- WBG Performance Standards (2012) including:
 - PS1: Assessment & Management of Environmental & Social Risks & Impacts;
 - PS2: Labour and Working Conditions;
 - PS3: Resource Efficiency and Pollution Prevention;
 - PS4: Community Health, Safety, and Security;
 - PS5: Land Acquisition and Involuntary Resettlement; and
 - PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources; and
- WBG Environmental Health & Safety (EHS) Guidelines applicable to the Project including:
 - EHS Guidelines for Offshore Oil and Gas Development (2015); and
 - EHS Guidelines for Onshore Oil and Gas Development (2007).

PS7 (Indigenous Peoples) was excluded from the scope of the IESC's work on the basis that the Environmental and Social Due Diligence⁸ performed prior to financial close concluded that no Indigenous Peoples are affected by the Project.

PS8 (Cultural Heritage) was excluded from the IESC's scope, however Cultural Heritage is included in so far as it relates to specific issues such as shrines and chance finds.

Given the mature stage of the Project, and incorporation of the above standards during the development of the Project's ESMS, the Project is assessed, essentially, against its own ESMS and associated management plans.

2.2 Structure of the Report

Following this section on the report structure, Section 3 provides a brief Project status update at the end of Q2 2020 based on information provided by Eni Ghana, for example, completion of key milestones that have relevance to the IESC's scope of work. It is intended only to provide context to the report and is not intended to be comprehensive.

Section 4 includes Significance Criteria used primarily in the more comprehensive site visit reports to categorise issues as High/Moderate/Minor significance. The criteria are relevant to Appendix 2 of this report.

⁸ An environmental and social due diligence (ESDD) exercise was performed by KBC Process Technology Ltd on behalf of potential lenders [Ref: Environmental and Social Review OCTP Project, Ghana September 2016]. The ESDD Report identified a number of issues and made recommendations that were transposed into an Environmental and Social Action Plan (ESAP). The ESAP provided in the ESDD report is consistent with the final agreed ESAP developed by the WBG and included in Appendix 1 of this report.

Sections 5 to 11 provide new findings and updates on issues raised in the IESC's preceding Q2 2019 QMR monitoring report, which itself includes findings carried over from earlier reports, organized by the applicable Performance Standards. Reporting is by exception only; no commentary is provided where the status/categorisation of significance is unchanged. In Appendix 2, the 'Summary of Findings' tables, for each of the applicable Performance Standards, are consolidated and the status confirmed, for example, stated as 'closed' where applicable or otherwise left as 'open'. Where findings raised by the IESC, notably in its earlier site visit reports, are not necessarily addressed in subsequent AMR/QMRs because information was not available or issues require on-site verification, such issues will be highlighted for further consideration during the next IESC site visit.

2.3 Limitations

The findings expressed in this report are based on a desk-top review of material provided and supplemented by several targeted teleconference calls with representatives from Eni Ghana's Safety & Environment & Quality (SEQ) and Sustainability & Local Content (SLC) teams. The IESC has not fully engaged in discussion with all Project staff on the understanding that detailed discussions will take place during the next site visit.

The IESC has not duplicated all information provided in previous reports. As necessary, to obtain background information/context in relation to this report, this report should be read in conjunction with previous IESC reports listed in the Table 1.

3. PROJECT STATUS UPDATE

A brief description of the overall Project is provided in Section 3.1 with the current status provided in Section 3.2. Neither can be considered comprehensive, but instead are intended only to provide context to later sections of this report.

3.1 Project Description

The Project, as described in the ESIA Report, involves the development of the Sankofa East oil field and non-associated gas in the Sankofa and Gye Nyame Gas Fields, which are located offshore, 55 to 60 km from the coastline of the Western Region of the Republic of Ghana (Figure 1). The operator, Eni Ghana, is developing these fields as an integrated oil and gas development Project utilising a newly converted double-hulled Floating Production Storage and Offloading Vessel (FPSO). Other key components of the Project include:

- Fourteen wells for oil exploitation (producing and injection wells); oil is transferred to tankers for direct export to market;
- Five wells for non-associated gas exploitation;
- A 63 km subsea gas pipeline from the FPSO to shore;
- A 1.5 km onshore gas pipeline from the shore to the ORF;
- The Onshore Receiving Facility (ORF) (Figure 2), including a gas compressor station, pilot and permanent accommodation camps, firefighting station, helipad and medical facility; and a tie-in to the existing Ghana National Gas Company (GNGC) 20-inch gas pipeline; and
- A logistics base in Takoradi and a quay within the port of Takoradi.

The Project is split into two phases:

- Phase 1: Oil Development Project. This phase consists of the 14 subsea wells (8 oil producers, 3 water injectors and 3 associated gas injectors), subsea facilities, and the FPSO located approximately 60 km offshore south of Sanzule; and
- Phase 2: Gas Development Project. This phase will consist of 5 subsea wells, subsea facilities, gas-treating facilities on the FPSO, a 63 km subsea gas pipeline (gas export sealine (GES)), the ORF, and tie-in with the GNGC sales gas pipeline.

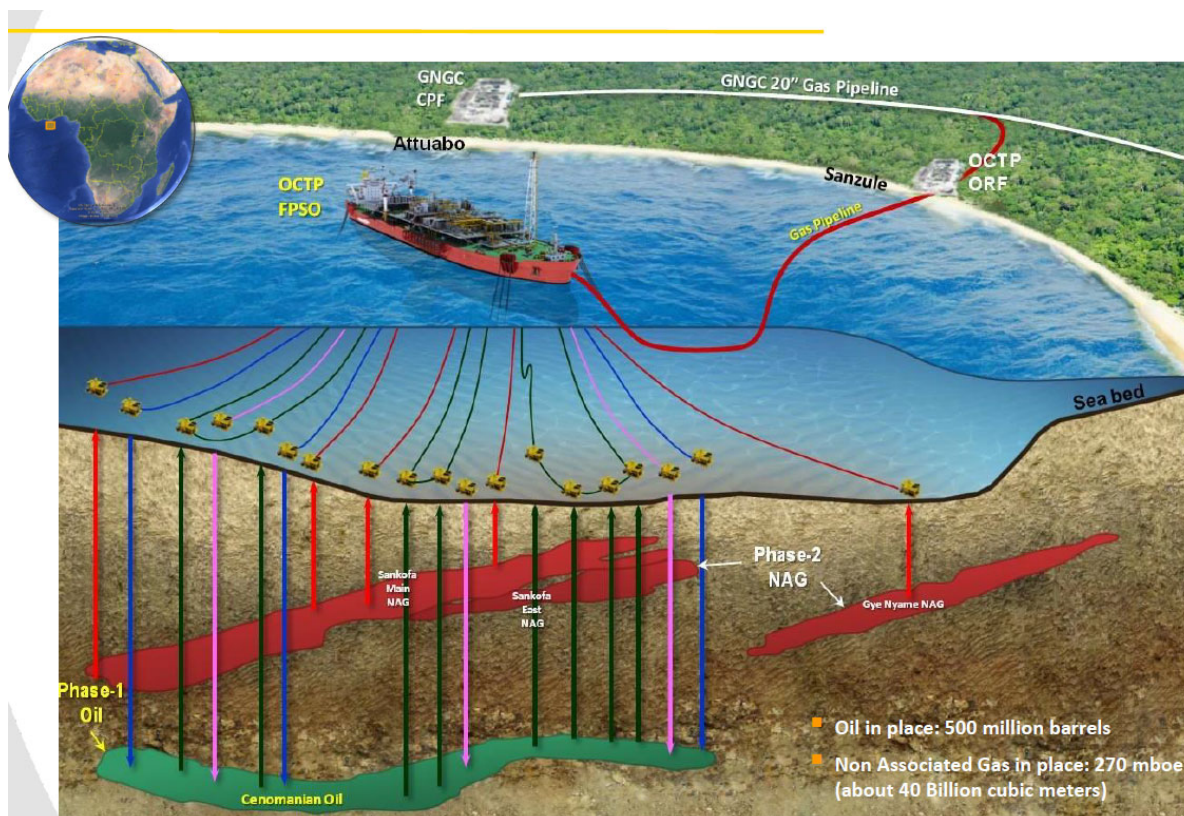


Figure 1: Schematic of the OCTP Project

Material Project design/scope changes since the ESIA Report was prepared include 3 infilling wells, the upgrade of regulating and metering stations with a short interconnecting pipeline in Takoradi associated with the West Africa Gas Pipeline and a revised approach to nearshore pipeline installation/beach crossing. These changes are described in previous reports and are not duplicated here.

3.2 Status of the Project at the end in Q2, 2020

The Project is in its Production Phase with first oil achieved in Q2, 2017 and first gas Q3, 2018. At the time of the last site visit in May 2019, construction was largely complete with the following exceptions:

- minor works and construction of the permanent accommodation camp; and
- construction activities were ongoing at the downstream WAPCO Tema site (a part of the Takoradi - Tema interconnection project).

As of the end of Q2, 2020, works at the permanent accommodation camp were complete (October 2019) and the Tema site works were completed in Q2 2020. The implementation and monitoring of land restoration and works have been ongoing throughout the reporting period. Other key milestones achieved in 2019 and 2020 include:

- **Subsea Umbilicals, Risers & Flowlines Transportation and Installation (SURF T&I):** Installation and start-up of for OP-9 and OP-10 infilling wells occurred in Q2 2019 (outside the scope of this report).
- **Onshore Receiving Facilities (ORF):** Last works related to Permanent Accommodation Camp were completed by Q3 2019. Restoration and revegetation activities were initiated on those areas of ORF where construction and contractor activities were finished, for example, the construction workshops.

- **Takoradi - Tema interconnection project (TTIP):** In 2019, construction works occurred in all the TTIP sites. The WAPCO and GNGC Takoradi sites were completed and start-up respectively achieved on the 28th of February and 5th of April 2019 (thus outside scope of this report). Restoration work has also been completed. The scope of works for the WAPCO Tema site was put on hold and a new optimized scope of work was defined and agreed among all the stakeholders in 2019. Construction was ongoing at WAPCO Tema site through to Q2 2020.



Figure 2: Aerial photograph of the Onshore Receiving Facility (October 2019)

Construction Phase permits have now been replaced by the Production Phase permit. A Phase 2 Production Operations Environmental Certificate (Reference no. CE0021780607) was issued on 18th December 2019 by the Environmental Protection Agency (EPA) which authorises Eni Ghana to continue the operations of Non-Associated Gas processing on the FPSO, export of gas through offshore and onshore pipelines and the operation of the Onshore Receiving Facility at Sanzule in the Ellembele District of the Western Region as part of the OCTP Phase 2 production.

In Q3 2019, Eni Ghana also received a permit from the EPA for acid stimulation and scale inhibitor treatment of 5 wells.

3.2.1 Employment data

An analysis of employment data presented in the AMR and the Q1 and Q2 QMRs was undertaken and the results are presented in Table 2. The presentation of the data in the AMR and the Q1 and Q2 QMRs differs from previous similar earlier reports. The new presentation of data makes it difficult to compare employment data with earlier time periods (of note, it is difficult now to track the numbers of female and DAoI⁹ workers). Within the constraints of the data, an attempt is made to give an overview for the two main operational project sites (ORF and FPSO) and to identify noteworthy changes over the reporting period. It is recommended that consistency in employment data presentation, in AMRs/QMRs, is maintained to the extent that is practical and that the reasons for changes are explained briefly.

⁹ DAoI is the Direct Area of Influence (of the OCTP Project), consisting of four nearby villages.

Both Eni Ghana direct employees plus contracted workers are present at the 2 operational sites, as shown in the Table 2 (data as of end 2019 and end June 2020).

Table 2: ORF and FPSO Employment Breakdown

Location	Year	# Total Workers (Direct: contracted)	#Females	# Ghanaian	# DAoI	# Expatriates
ORF	12/2019	154 (38:116)	4	148	21	6
	06/2020	112 (36:76)	3	107	4	5
FPSO	12/2019	209 (15:194)	1	130	0	79
	06/2020	195 (13:182)	1	126	0	69

Key changes, comparing worker numbers between end 2019 and end June 2020, are:

- Minor reduction (7%)¹⁰ in the total number of FPSO workers with smaller reduction in Ghanaian (3%) and larger reduction in expatriate (13%) personnel respectively;
- Reduction (27%) in total number of ORF workers; due mostly to reduction of contracted workers. The number of Ghanaian workers declined from 148 to 107 including the loss of 17 DAoI workers (although as there are 67 security guards, it is likely that some of them are from the DAoI villages – unfortunately, no breakdown of the security guards in terms of origin or gender is provided¹¹); and
- The number of expatriate workers at the ORF declined from 6 to 5.

¹⁰ Percentages are rounded up or down.

¹¹ This figure does not include those security guards that may be based in the DAoI as no data are presented in the AMR/QMRs on the number of security guards from the DAoI area; however, the IESC understands, from Eni Ghana that ~40 of these guards are from the DAoI.

4. SIGNIFICANCE ASSESSMENT

4.1 Introduction

Within this report, the IESC provides status updates, including significance, against the issues (identified in the IESC’s May 2019 site visit report), as amended following a review of the Project’s Q2 2019 Quarterly Monitoring Report, where evidence in the 2019 AMR and the Q1 and Q2 2020 QMRs allows for an update of the status of such issues. Appendix 2, Table 1 presents these previously identified issues with a status update, when possible, arising from this review.

Open issues identified in all other earlier monitoring reports, prior to the May 2019 monitoring report, are presented in a further table (Table 2) in Appendix 2. Changes to these earlier issues, arising from the 2019 AMR and the Q1 and Q2 2020 QMR review findings, are recorded in this table.

4.2 Interpretation of the Consolidated Table

To assist interpretation of the consolidated table in Appendix 2, the following brief description is provided.

For each issue, the following information is presented:

- The aspect;
- A description of the issue, for example deficiencies or omissions;
- The phase(s) to which an issue relates;
- Identification of the standard(s) against which the deficiency or omission has been identified;
- IESC’s recommendation, where applicable, to resolve/manage the deficiency or omission; and
- The significance of the issue: on a three-point scale (see below for criteria).

A ranking system has been used to indicate the relative significance, based on the level of non-compliance, of an issue. As well as highlighting key areas requiring attention, it can also be used to aid the tracking and rectification of specific issues requiring improvement.

Identified issues have been placed into one of the following four categories:

Minor: Minor non-compliance, risk or minor technical breach of Applicable Standards and commitments with no material, actual or likely potential: environmental or social consequences; or significant human injury or harm.

Moderate: Moderate non-compliance or risk with actual or likely potential: localised and short-term environmental or social consequences; minor human injury or harm; or material short-term breach of Applicable Standards and commitments.

High: Major non-compliance or risk with actual or likely potential: spatially extensive and/or long-term environmental or social consequences; serious human injury/death or harm; or material and extensive breach of Applicable Standards and commitments.

Not Issue is noteworthy, but it is not an issue of non-compliance.

Applicable

Where time-critical recommendations for specific actions are presented, a timeframe linked to Construction/Operational phase milestones is indicated in the IESC recommendations column. Time-critical issues can lead to a higher classification of significance.

Table 3: Example of the summary table format

ID	Aspect	Issue Description	Phase¹²	Standard	IESC Recommendations	Significance
00	Storm water run-off – monitoring	The ESAP requires <i>Company X</i> monitors the quality of surface water run-off from facilities. To date the Company has been unable to procure monitoring equipment – no monitoring has been undertaken.	Ops	WBG EHS Guidelines ESAP	<i>Company X shall expedite procurement of monitoring equipment with the support of senior management.</i>	Moderate

¹² Phases can include: construction; operations; decommissioning or; any combination of these phases.

5. PERFORMANCE STANDARD 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

5.1 Status update for previously identified issues

See Appendix 2.

5.2 New PS1 findings in Q2, 2020

5.2.1 Management of Change

Two Management of Change (MoC) notifications were raised with the WBG in 2019, of which one was in the second half of the year (within the reporting period of this report). The MoC case, dated October 2019, relates to extension of the implementation of the Community Investment Strategy (CIS) from three years to four years, in part due to delays experience in defining actions with an implementation plan (Section 5.3). Further baseline survey data were collected in Q1 2020 for the implementation of the Local Development Project.

In Q1 2020, no Management of Change actions were initiated.

In Q2 2020, a further MoC case was raised notifying of disruptions to livelihood restoration and community investment initiatives as a result of government-imposed COVID-19 related social distancing requirements (Section 5.3).

For the two MoC cases described above, both are concerned with delays in implementation of agreed actions, rather than a material change to the scope. The delays are not envisaged to result in additional adverse HSE impacts; however, it is anticipated that there will be an adverse, but temporary effect on receipt by some beneficiaries of certain benefit flows arising from the slowdown in LRP activities. Given the continuation of COVID-19 restrictions, these actions are not capable of being 'fast tracked' and, also, will not be mitigated by an extension to the LRP Support Services delivery period (Section 5.3 and 9.2.3).

5.2.2 SEQ and SLC resources

The SEQ and SLC teams have been restructured following full transition to Production. The current SEQ organogram is shown in 2 parts (Figures 3a and 3b): Figure 3a shows the key 'functional' posts based in Accra and Figure 3b shows the site/facility-based personnel devoted to supporting two of these posts. Of particular note, the SEQ Manager has been replaced and a number of positions within the team, including the HSE Operations Coordinator, remain vacant. This post, in particular, would appear to be important for HSE performance. The IESC has been informed the vacant post results from a recent departure¹³ and a replacement is expected in early 2021. The WBG and the IESC should be informed of any interim measures put in place whilst this and other posts are vacant in addition to actions being undertaken to fill the posts.

The IESC notes the additional SEQ and SLC support to Eni Ghana currently being provided by Eni Headquarters (HQ), Milan. In particular, the IESC welcomes the increased level of support from PS6 biodiversity specialists based in Milan. See also section below relating to the Eni HQ Sustainability function.

¹³ In this case 'recent' means shortly before drafting of this report in October 2020.

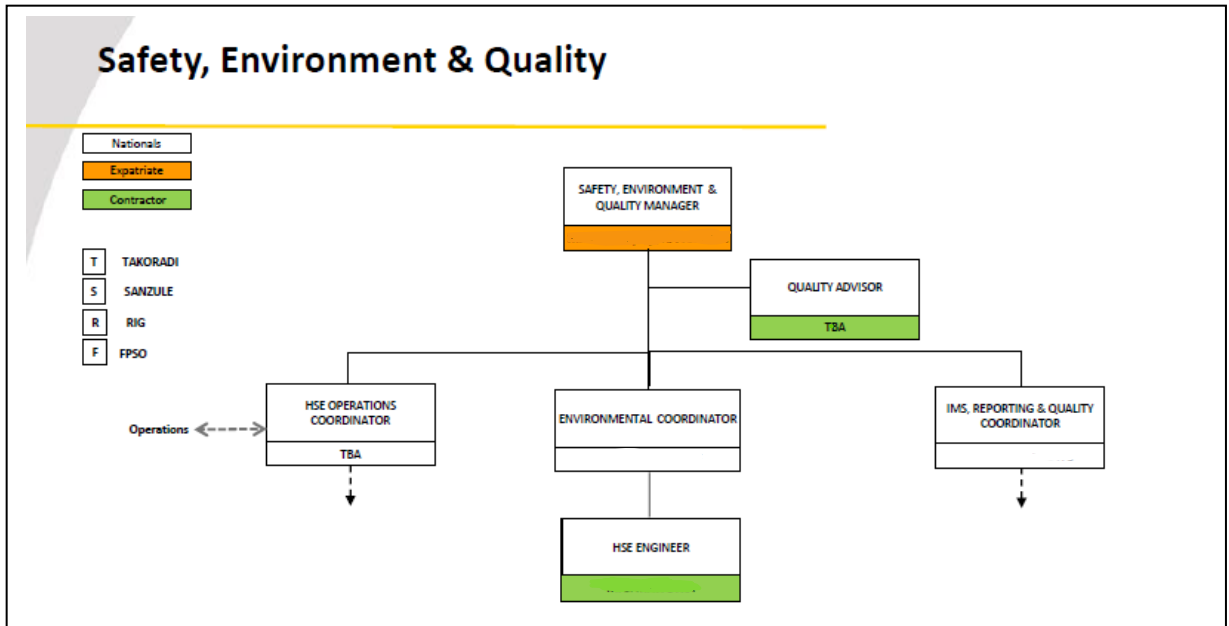


Figure 3a: Safety, Environment and Quality Organogram (Production Phase), Sept 2020

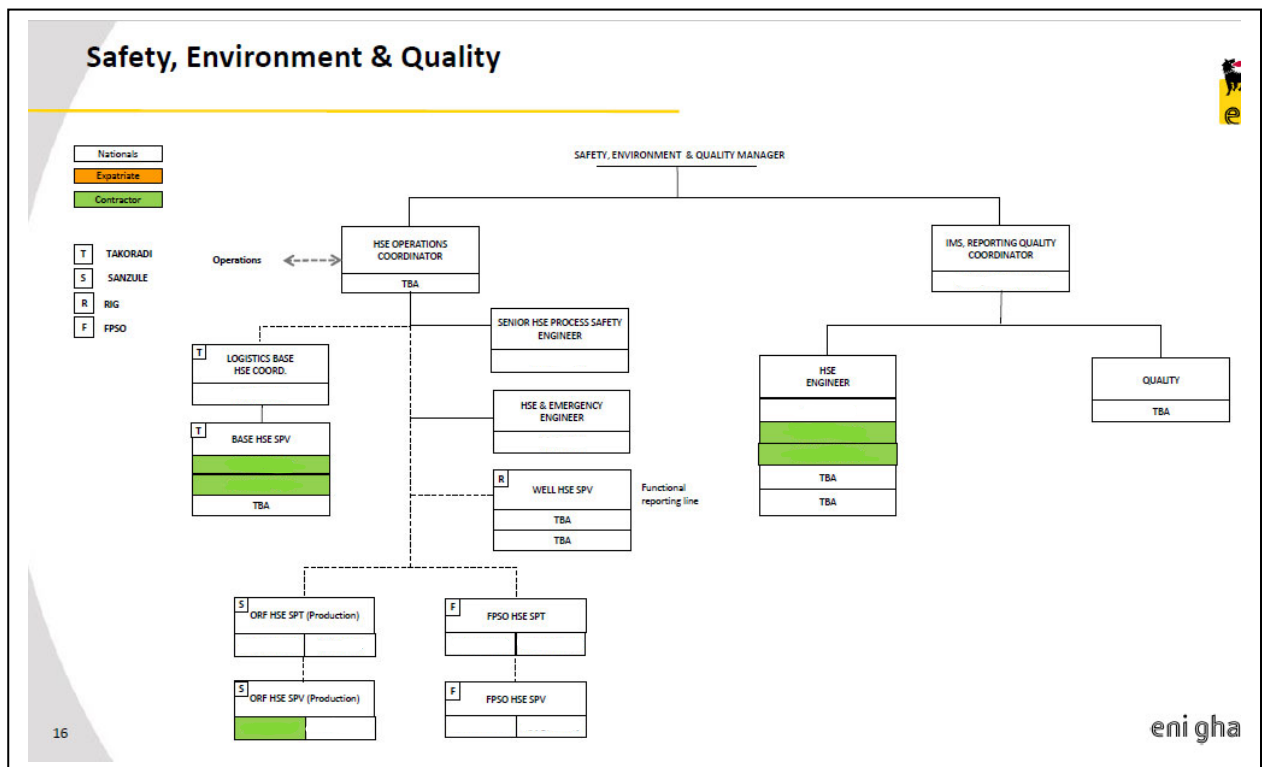


Figure 3b: Safety, Environment and Quality Organogram (Detailed), Sept 2020

The current SLC organogram is shown in 2 parts (Figures 4a and 4b): Figure 4a shows the key ‘functional’ posts and Figure 4b shows the personnel devoted to supporting two of these posts: ‘Stakeholder Management’ and ‘Local Sustainable Development’. The current SLC Organogram was introduced in the second half of 2019 and is almost identical in its structure and set of functional units to the organogram recorded in the IESC’s May 2019 monitoring report. There is a new post entitled ‘Local Content’ (a temporary role which was filled for the required duration and the post is no longer needed) and there have been a few changes in personnel and reductions/additions of personnel to certain units; for example, the team of Community Liaison

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Officers has increased from 4 to 5 while the team of LRP Delivery Officers has declined from 3 to 2. However, towards the end of 2019 one of the LRP Delivery Officers resigned and, since this resignation, the Fishery Management Plan Delivery Officer supports the 2 LRP Delivery Officers. The Fishery Management Plan Delivery Officer can provide this support as the workload related to implementing the Fishery Management Plan has declined since mid-2019. Effectively, the complement of staff focusing on LRP delivery has not changed. Of note, the new '5th' member of the Community Liaison Officers is also the Community Stakeholders Engagement Officer (Figure 4b). Eni Ghana consider the two posts to have similar roles.

There are 16 personnel based in Sanzule (excluding the Civil Engineer Supervisor) which is similar to the number of Sanzule-based personnel listed in the May 2019 version of the organogram. The SLC team continues to be supported by the Eni HQ Sustainability function, which is based in Milan (see 'box' in the organogram entitled 'Social Projects Implementation Support').

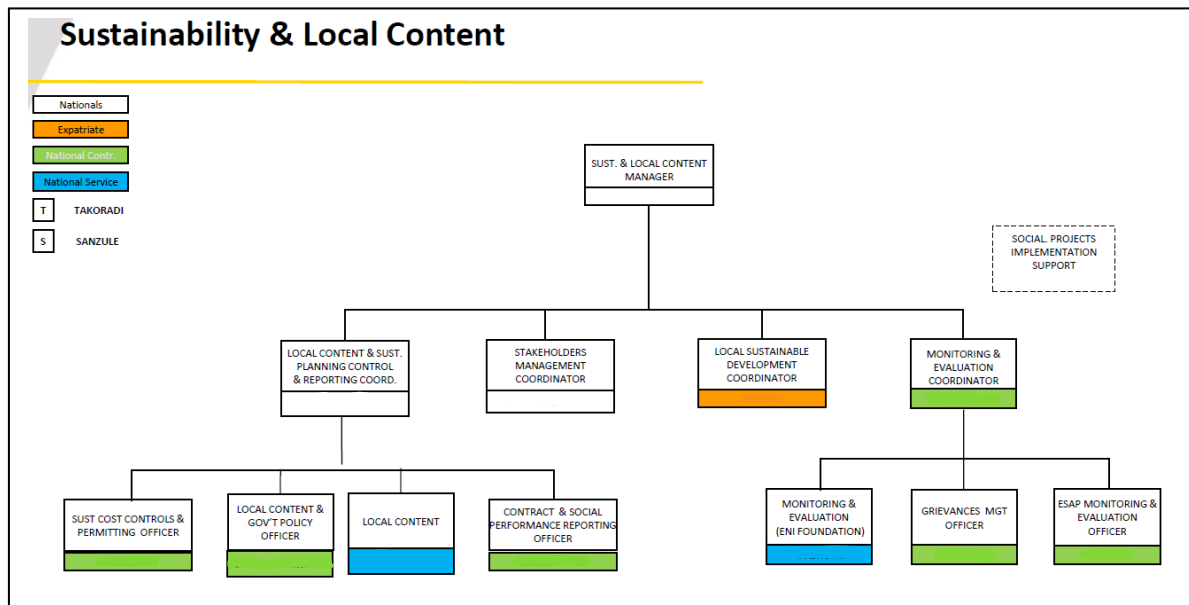


Figure 4a: Sustainability and Local Content Organogram (Production Phase), Sept 2020

Ghana has indicated, also, that the focus of work for the LRP Delivery Officers has shifted away from LRP delivery to monitoring and evaluation activities reflecting the situation where the LRP Support Services will cease at the end of January 2021 and the resulting need for Eni Ghana to determine the effectiveness of the LRP Support Services, in restoring livelihoods, in the final stages of its implementation.

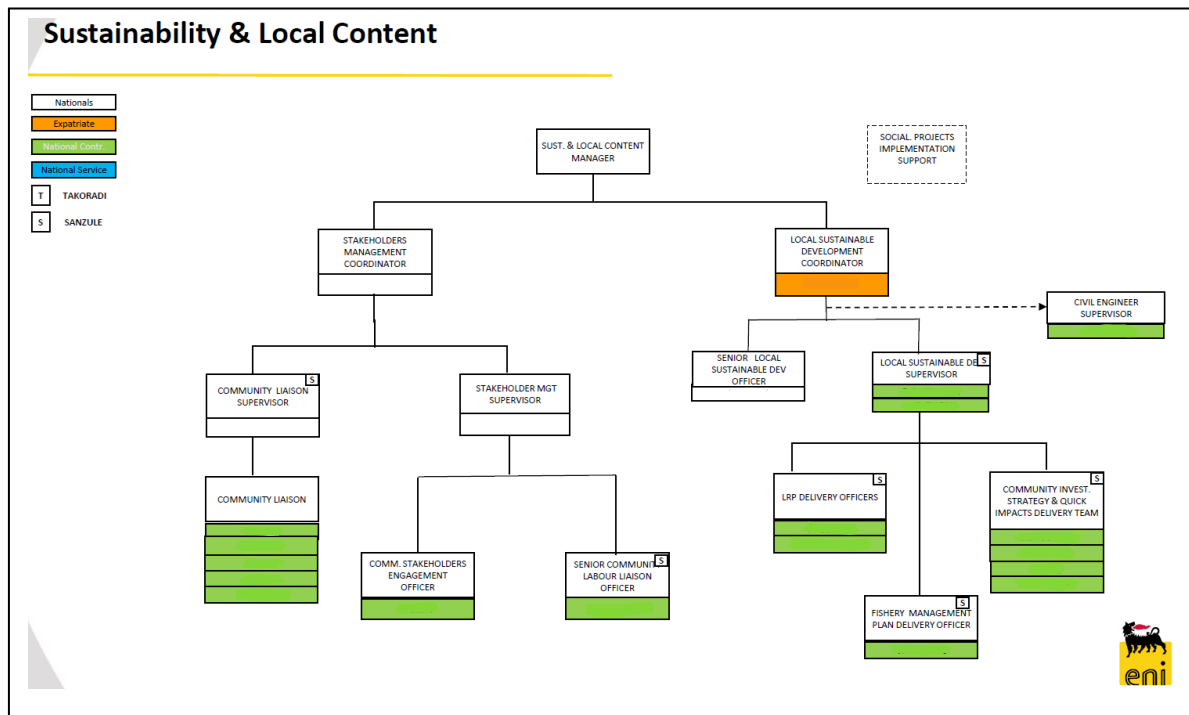


Figure 4b: Sustainability and Local Content Organogram (Detailed), Sept 2020

5.3 Community Investment Strategy (CIS)

In October 2019, Eni Ghana issued an MoC Notification concerning a decision to extend the life of the CIS by 1 year (see below). In this Notification the CIS is referred to as the Local Development Project-CIS (LDPj-CIS). The aim of the LDPj-CIS is to promote inclusive economic growth and well-being for the 10 coastal communities in the Ellembelle District (which includes those in the DAoI). There are four main components/sectors of the LDPj-CIS:

- Water and Sanitation;
- Education;
- Access to Energy; and
- Economic Diversification (Livelihood and Building Business activities).

Key LDPj – CIS actions in Q3 and Q4 2019 included:

- Finalizing the LDPj-CIS Implementation Plan – identifying near-term priority actions;
- Issue of MoC Notification regarding extension of the CIS by 1 year to a duration of remaining 4 years making the implementation period 2019 to 2022 instead of 2019 to 2021. Two reasons are given to justify the change:
 - Mitigation of the unforeseen additional time taken to prepare the CIS Implementation Plan which resulted in postponement of certain planned actions in 2019; and
 - Maintaining public support for and community ownership of the CIS by demonstrating that there would be no loss of benefit streams arising from CIS implementation;
- Development of a cooperation agreement with the National Board for Small Scale Industries (NBSSI) to implement the 'Building Businesses' initiative under the LDPj – CIS Economic Diversification component and finalization of proposals for actions to be implemented under this initiative;
- Development of a cooperation agreement with TechnoServe (TNS) to implement the Livelihood initiative under the LDPj – CIS Economic Diversification component;

- Preparation of a Concept Note for a Rural Clean Cooking Project (to be implemented in conjunction with the World Bank, United Nations Development Program, the Energy Commission and Ministry of Energy), for the 10 communities;
- Sign-off of the LDPj-CIS on 21 November 2019; and
- Launch of the LDPj-CIS in December 2019, following the signing of two Memoranda of Understanding (MoUs) between Eni Ghana and Ellembelle District Assembly and the Eastern Nzema Traditional Authority respectively.

In Quarters 1 and 2 2020, key LDPj – CIS actions included:

- In March 2020, a baseline household survey in all 10 communities was undertaken successfully. The aim is to obtain primary community-level data, for the period before LDPj – CIS activity implementation starts, to be used later to assist monitoring of performance in terms of household- and community-level changes in incomes/livelihoods and other key parameters. Later, in Q2 2020, work started to obtain secondary data to complement the primary survey data;
- Developing the Building Businesses’ and Livelihood components of the overall CIS Economic Diversification programme; Rural Clean Cook Stove Initiative: Signing of MoU with the World Bank and drafting of a cooperation agreement with the Ghana Alliance for Clean Cook Stoves to develop clean cooking initiatives. There will be a 3 phased pilot project up to December 2022. The key overall aims are to reduce fuelwood use and create cleaner cooking environments (benefitting vulnerable people plus women and children). Two important early tasks are to select the type of cook stove to be used and then to investigate the feasibility for local production of the stoves. Initial distribution is estimated as being 600 cook stoves. The ‘kick off’ workshop, in partnership with the World Bank, was held on 5 March 2020; and
- Analysis of the LDPj - CIS undertaken to integrate the specific sectors with initiatives aimed at preventing COVID 19, ensuring hygiene best practice awareness and, where possible, identify innovative ways of implementing the initiatives, considering COVID-19 limitations.

In May 2020, Eni Ghana issued another MoC Notification concerning the ‘slowdown’ in both LDPj - CIS and the LRP activities due to government-imposed restrictions in relation to the COVID-19 pandemic. For those communities benefitting from both the LDPj - CIS and the LRP, the cumulative result is an increase in the time period before the combined benefits are accruing/will accrue to the inhabitants. The addition of another year to the LDPj - CIS will help to mitigate the adverse impacts; however as of July 2020, there is no Eni Ghana intention to extend the LRP Support Services to compensate for delays in implementation post May 2020 (see Section 9.2.3).

With respect to the ‘Quick Impact Projects’ component of the Community Investment Strategy (CIS), the 2019 AMR and the Q1 and Q2 QMRs record the progress, in monthly reports, on both the water supply (villages of Sanzule [including Anwolakrom]; Krisan and Bakanta) and the educational project (all identified government schools of Eikwe, Krisan, Sanzule, and Bakanta). Both these two ‘Quick Impact Projects’ are considered in detail in the sections immediately below.

5.4 Community Investment Strategy: Quick Impact Projects

5.4.1 Water Supply Project

The IESC’s May 2019 site visit report and the subsequent Q2 2019 monitoring report highlight several difficulties/challenges being faced by this project and the community-based Water Board Committee (the ‘Committee’) which is responsible for managing the project. The IESC’s Q2 2019 monitoring report highlighted the key problem as being revenue collection and inability to

generate a sustainable level of cash flow and further presented the measure put into place to try to rectify the situation.

A review of the LDPj-CIS monthly reports for the 1-year period from end Q2 2019 to end Q2 2020 indicate that there have been continuing difficulties/challenges in managing the water project. The main difficulties/challenges (some of which are inter-related) and the additional remedial measures taken during this period and, also, proposed for the future, are listed below:

- Main difficulties/challenges:
 - Ineffective management by the Committee;
 - Inadequate maintenance regime (on one occasion causing a water quality problem);
 - Poor revenue collection;
 - Inadequate cash flow;
 - Inability to repair the solar power unit (even though under guarantee); and
 - Unexpected significant expenditure on purchase of electricity from the grid; and
- Additional remedial measures taken:
 - Continual provision of Eni Ghana support to the Committee into Q3 2020;
 - Decision made to 'reconstitute' the Committee by end Q3 2019 with Eni Ghana support continuing into the first half of 2020;
 - Using the opportunity provided by a community health awareness campaign in Sanzule, Krisan, Bakanta and Eikwe (late July to early August 2019) to encourage community members to use the water, as it met World Health Organization (WHO) standards for potable water, thus, helping to protect users against water-borne diseases;
 - Initiation of discussion with DeSimone Ltd for the Krisan school canteen (supported by DeSimone Ltd) to purchase water and thus increase revenues;
 - Active consideration (early discussions in Q2 2020) with Ellembelle District Assembly concerning a possible hand-over of the water project to the Assembly. Such a handover is not now under discussion and, instead, a decision has been made to reform the Committee, thus retaining the management of the project under community leadership (but with continuing Eni Ghana support); and
 - Contracting of STEPP PRYME Engineering Ltd (March 2020) to construct the extension of the project into all areas of Sanzule (extending distribution network and installing additional fetching points). The extension into Sanzule is expected to boost the number of users and, therefore, increase revenues. Work has been affected by COVID-19 restrictions, but Eni Ghana expects that the extension project will be able to deliver water to its new customers by mid October 2020.

Managing the water project has proved to be challenging for the Committee and for Eni Ghana in terms of oversight and, crucially maintenance; both at the 'everyday' level and when there are equipment failures, such as the solar power unit with structural longer-lasting implications. The solar power unit was not working in June 2019 and as of June 2020 it had not been repaired or replaced. Since June 2019, the water supply project has been dependent upon the national grid for electricity; thus adding to the project costs and, in fact, contributing to the inability of the Committee to pay its utility bills and, overall, to a chronic problem of financial management. As part of its Scope of Work for the extension of the Eni Ghana funded water supply project, STEPP PRYME is refurbishing the entire project including the solar power unit.

In June 2019, a water quality sample was taken, and the results reported to Eni Ghana 7 days later. The analysis was against the national 'Specification for drinking water FDGS 175-1:2013'. The results of this analysis state that, "The pH of the analyzed water sample doesn't meet the

GS: 175-1 guideline for drinking water. Hence, it is unsuitable for potable use and must undergo further treatment.” Investigations with the person responsible for cleaning /maintenance resulted in the cause of the pH imbalance being identified as a mix-up in the chemical treatment of the water. The pH imbalance was rectified quickly thereafter. The communities served by the water project were not formally informed of this quality issue. However, the Committee, whose members are all community-based (four communities), were aware of the analysis results and the remedial action taken and one of the roles of the Committee is to convey messages about the water supply project to other community members. As Eni Ghana does not monitor communications between the Committee and community members; the scale and extent of dissemination of information on the water quality results is not known. The IESC understands that there has been no water quality sampling since June 2019.

With respect to future water quality monitoring, STEPP PRYME will provide guidelines for the maintenance of the water system including water quality testing. Eni Ghana expects that monitoring will occur twice per year, to be managed by the Committee after the handover of the water supply project to the communities (planned for end 2020/early 2021), with the next water quality sample being taken in October 2020¹⁴.

Of note, at the request of the government of Ghana, Eni Ghana has been supplying water free to all those which can access the fetching points. The aim is to assist community members cope with COVID-19 by enabling and encouraging them to adopt and/or continue with improved hygiene practices. Initially, the scheme covered a three-month period from March to June 2020, but it was extended, initially, for another 3 months until the end of September¹⁵.

5.4.2 Educational Project

Essentially, the educational project consists of two components:

- Capacity-building for school staff; and
- Improvements to schools and related infrastructure.

Progress under these two components is considered in the sections below.

Implementation of Pilot Educational Project (Capacity-building Component)

Progress has been made with the capacity-building component, but it has faced three challenges. First, there was a problem between Teach for Ghana (TfG)¹⁶ (implementing contractor) and Eni Ghana regarding TfG communications with communities /authorities, of which Eni Ghana was unaware. A meeting was held to agree basic principles to be followed by both parties to ensure that engagement with stakeholders was always aligned.

On 10 September 2019, 8 teaching assistants (recent graduates; referred to as ‘fellows’), recruited and trained by TfG, began work to assist with teaching activities in Primary and Junior High Schools in the following 4 villages – Sanzule, Eikwe, Bakanta and Krisan (24 teachers to be assisted). Soon after their deployment, criticism arose, especially amongst the youth of Sanzule, who were concerned about the lack of Sanzule community members amongst the fellows, especially given the high levels of local youth unemployment. A petition was raised and presented to Eni Ghana requesting that the fellows be withdrawn from their work in the schools. As Eni Ghana considered that there were security concerns, it suspended the capacity-building component until a consensus could be found concerning its future.

¹⁴ The IESC has received the results from the October 2020 water quality test and the results confirm the potability of the water,

¹⁵ The IESC has been informed that the extension will cease by end of 2020.

¹⁶ Teach for Ghana changed its name to Lead for Ghana shortly after it began work on the educational project.

A series of meetings between all key parties, including a meeting between Eni Ghana and its implementing partner, now Lead for Ghana (LfG), resulted in an agreement that the 8 fellows would be replaced by 8 alumni. These alumni are university graduates who had completed, already, a fellowship at LfG and, therefore, had more 'on the job' experience compared to the fellows. This decision was preceded by a meeting between Eni Ghana and the Sanzule community where Eni Ghana clarified the selection process and, importantly, the community gave Eni Ghana and LfG an assurance that it was satisfied with the process and that the capacity-building component could continue. Thus, on 02 December 2019, the alumni began work in the schools. Unfortunately, overall, there was delay of about 2.5 months starting the capacity-building component of the educational project.

Considerable efforts were made by the alumni to catch-up on all missed lessons in the period from 02 December 2019 to mid-March 2020. However, due to the COVID-19 pandemic all schools were closed by a Government of Ghana order and the alumni withdrawn. In response, in Q2 2020 (late May and June), LfG prepared and then implemented a COVID-19 Student Learning Plan. Under this Plan, LfG initiated a 9-week scheme of work where the alumni tried to ensure that teaching and learning continued via various means such as 'phone calls, online platforms, teaching and learning in small clusters, and home visits (undertaken by the local teachers) while abiding by the COVID-19 protocols in place. Finally, two professional development sessions were held for teachers and head teachers on June 18 and 19, 2020.

Overall, from middle September to early December 2019, the effectiveness of the provision of teaching support, through fellows, was affected adversely by external events. During 2020, the initiative to try to support learning during the period of school closure, is noteworthy as an innovative action in response to the pandemic. To follow up on the actions in its 'COVID-19' Plan; it is recommended that LfG updates, regularly, this Plan in line with new measures/restrictions to enable the project to minimize adverse educational impacts from COVID-19. Once, all measures/restrictions are removed then Eni Ghana and LfG should evaluate and then agree actions, if necessary, to facilitate a 'catch up' in the shortest possible time period.

Implementation of Pilot Educational Project (Infrastructure Component)

Regarding the 'school infrastructure' component, it was reported in the IESC's Q2 2019 monitoring report that procurement procedures resulted in interested vendors submitting technical documents for evaluation. However, in early 2019, the selected tenderer (TfG) was found not to have the appropriate capacity for the construction component of the works and a repeat of the tendering process was put in place to select an alternative tenderer. At the same time, as TfG was appointed to implement the capacity-building component, a decision was made to progress with the capacity-building component of the project before the infrastructure component was initiated.

Subsequently, toward the end of Q2 2020, an occupational and community health and safety issue arose. The construction works require that asbestos is removed, handled and then disposed of safely. This unexpected problem has complicated both the selection of a preferred tenderer and the implementation of the works as the selected tenderer must have the required certification to do such work and, also, must obtain a permit from the EPA to undertake the asbestos removal work at the school/s and then to dispose of the asbestos safely .

There has been a delay of at least 1 year in implementing the main construction works for the infrastructure component of the project; most recently, resulting from the need to manage asbestos found in some of the school structures. It is recommended that Eni Ghana work closely with the selected contractor to reduce any delays related to acquiring the requisite permissions for managing the asbestos issue.

Of note, the alumni have undertaken refurbishment work on some existing classrooms and installed white marker boards at the Old Bakanta primary school. Despite the overall delay in the infrastructure component (which did not affect the capacity-building component) plus the challenges faced by the project's capacity-building component, the IESC considers that-both-the educational infrastructure and capacity-building components will be able to get back on track soon, and the delivery of benefits to the students/teachers occur as intended.

5.4.3 Stakeholder Engagement

The OCTP Stakeholder Engagement Plan (OCTP Operations in Sankofa, Gye Nyame and the ORF) (Operations SEP) was finalized in June 2019. The SEP focuses on engagement related to key ongoing project-related activities, specifically: LRP implementation, LDPj – CIS implementation, workforce demobilization and engagements on enforcement of security and exclusion zones.

For the period 01 July to 31 December 2019, the 2019 AMR provides embedded copies of documents pertaining to stakeholder engagement events. An analysis of these documents provides an indicative picture of the relative number of engagement events by the topics listed above. The analysis shows that most meetings (11 from 17) related to LRP and LDPj – CIS issues. Many other documents presenting engagement events are provided in separate AMR sections and once these are added the dominance of the 2 topics is more pronounced. In Q1 and Q2 2020, the number of meetings declines significantly, and the only engagement events relate to grievances, LDPj – CIS and a meeting on the circular economy project (restrictions linked to the COVID-19 pandemic are a likely cause of the decline).

Although the Operations SEP covers the 10 communities (as per the LDPj – CIS), the documentation in the 2019 AMR and the Q1 and Q2 QMRs 2020 presents no information on stakeholder events focusing on the six non-DAoI communities. This does not mean, necessarily, that engagement events with any/all these 6 communities has not occurred; only that they are not reported for the 1-year period from 01 July 2019 to 30 June 2020 via the AMR/QMR reporting mechanism. However, the IESC infers that Eni Ghana has not yet integrated, fully, these communities into its overall set of stakeholder engagement activities. The IESC expects that engagement with these communities will increase as the LDPj – CIS expands its activities in 2021 – to the extent feasible in the existing public health context next year.

5.4.4 Grievances

LRP-related documents provided with the AMR and the Q1 and Q2 QMRs 2020 provide information on the grievances managed by Eni Ghana and those managed by TNS, the LRP Support Services implementing partner. Previously, data on grievances managed by TNS (restricted to LRP-related grievances) were not supplied in AMRs/QMRs. An account of grievances and their management is presented below for both Eni Ghana and TNS managed grievances respectively. It is recommended that Eni Ghana record, in AMRs/QMRs, all grievances received by the Project (either by Eni Ghana or any of its contractors) - whether escalated by contractors or not - in the same manner that grievances received by Eni Ghana are recorded currently.

Eni Ghana

The IESC's Q2 2019 monitoring report recorded that there were two remaining open grievances; both relating to the suspected anchor/cable on the seabed. For one of the complainants, the claim is that fishing nets were damaged. The other complainant (on behalf of Sanzule fishers) alleges that the presence of the suspected anchor/cable is reducing the area available for fishing due to fishers taking avoidance action to reduce the risk to their nets/gear. In both cases, the complainants wanted Eni Ghana to support them in conducting a local verification exercise to

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determine the exact location of the alleged object and possibly locate and remove the alleged anchor/cable. One of the grievances (the grievance lodged on behalf of the Sanzule fishers) has been open since 10 January 2019. As of the end Q2 2019, the status of these two grievances was described as 'ongoing' (it was not clear at that time if Eni Ghana had reached a decision on the FMCC's proposal, "... *that fishermen undertake their own investigation and report to Eni Ghana.*").

Analysis of the community grievances listed in the 2019 AMR for Q3 and Q4 2019 show that only 3 grievances were received by Eni Ghana; 1 related to the LRP and 2 raised by fishing companies in August 2019 related to the suspected anchor/cable. The LRP grievance was registered on 08 October and closed on 20 October 2019. Only 1 grievance is recorded for the period covered by the Q1 and Q2 2020 QMRs. It was an LRP-related grievance which was registered on 23 January 2020 and closed on 30 January 2020.

Regarding the 4 fishery-related grievances (2 existing grievances open at the end of June plus 2 received in the period July to Dec 2019), the 2019 AMR reports that Eni Ghana conducted a seabed survey focusing on the area considered to be the location of the suspect anchor/cable. The results of the survey showed that this area was undulating with rock outcrops that could cause damage to the fishing nets. The results of the survey were disclosed to the complainants following a Fisheries Management Coordination Committee (FMCC) meeting. Subsequently, the FMCC drafted a proposal to conduct a 'local' verification to determine the alleged object. After a detailed review of the proposal, it "*.....was not considered by Eni Ghana on the basis that the nature of the exercise proposed by the FMCC has safety implications.*" Instead, Eni Ghana is willing to discuss with the FMCC an alternative option of agreeing to the monitoring of fishing activities and report of any damage caused, to be followed by further investigation. Eni Ghana has confirmed that a meeting with the FMCC, to discuss this grievance and its resolution, will be held in November 2020. Of note, the resolution suggested by Eni Ghana does not address the issue raised, by fishers, of the inconvenience caused by the need to avoid an area of sea due to the risks that they perceive of damage to nets/gear.

Since Q3 2019, Eni Ghana has been issuing periodic LRP Implementation Monitoring and Evaluation Reports. These reports provide information on grievances raised under LRP Support Services only. As the reporting is irregular over the period April 2019 to June 2020, it is not possible to analyse the data received to reach particularly meaningful conclusions. The data; however, do give an indication of numbers received, numbers closed-out and numbers escalated and, therefore, the data are presented here, primarily for information purposes.

Forty (40) grievances were raised in relation to the LRP Support Services in 2019. Of these 40 grievances, 30 (75%) related to difficulties arising from attempts to change options (the Option 1 and Option 2 choices presented to all PAPs) - almost all these grievances were submitted in January 2019. Other grievances were linked to issues of commitment to implement options, misunderstanding of starter pack delivery, complaints about insufficient funds to purchase animal/poultry feed, mortality of livestock and security issues. None of these latter grievance types exceeded 3 individual grievances over the year. Unfortunately, no information is provided on the status of all the grievances in terms of being open or closed (partial data on closure of grievances are provided in the following paragraphs). The fate of these grievances will be investigated during the upcoming site visit scheduled for Q1 2021.

TNS

A summary of TNS LRP-related grievance data for Q1 and Q2 2020 is provided below:

- Q1 2020:
 - January Q1 2020: 1 grievance escalated to Eni Ghana and closed on 30 January 2020. No TNS-level grievances;

- February Q1 2020: 3 TNS-level grievances. Two closed and 1 open; and
- March Q1 2020: One TNS-level grievance which was closed;
- Q2 2020:
 - No grievances escalated to Eni Ghana;
 - April 2020: 1 TNS-level grievance which was closed; and
 - May and June 2020: No grievances recorded.

Although the data are not comprehensive, it seems there has been a notable decline in the number of LRP-related grievances submitted between January 2019 and 2020 to date (end June 2020) with a very low number being submitted, after the January 2019 peak number concerning the difficulties in changing livelihood support options. Eni Ghana consider that this may be due to TNS benefiting from lessons learnt during implementation of Option 1 resulting in improved delivery of Option 2.

The 4 fishery-related grievances appear still to be unresolved and therefore remain open. It is recommended, if agreement has not been reached on an action to resolve the grievance by end 2020, that Eni Ghana proposes to the FMCC that a trusted, independent external party be involved to assess the grievance and propose a way forward.

Of note, in September 2019, Grievance Mechanism Complaint Boxes and Sign-Posts at the ORF and in all 4 project-affected communities were replaced or repaired.

5.4.5 Emergency Response

The AMR provides details of oil spill response training undertaken throughout 2019, including deployment and use of oil spill response equipment. However, no drills involving deployment of equipment under simulated emergency conditions were undertaken in the year. The WBG reporting template indicates a mandatory deployment drill each year. No explanation for lack of such a drill is provided in the AMR.

The IESC notes that a FPSO Level 2 drill was conducted in Q2, 2020. The drill scenario was based on a COVID-19 medivac from the FPSO. Although not specifically an oil spill related drill (as required in the template report), the scenario will have tested communications, decision making and virtual deployment of resources. The IESC supports the choice of drill scenario.

A consolidated leaks and spills register for the year 2019 records zero material release of hazardous materials. Similarly, no spills were reported in the Q1 and Q2 2020 QMRs.

5.4.6 Cumulative impacts

The IESC has previously reported on efforts to establish a multi-stakeholder platform for the management of cumulative impacts. In February 2020, a draft Inception Report was prepared in accordance with a Term of Reference developed by the IFC, to facilitate agreement on the design of the Cumulative Impact Co-management Platform. Feedback provided to the authors of the report, as of June 2020, has revealed several fundamental issues, relating to: i) the Steering Committee¹⁷ disagreement regarding which entities should be party to the platform and ii) funding of the platform and any substantive mitigation activities. A final version of the Inception Report, dated June 2020, does not include resolution of the afore-mentioned unresolved issues, thus hampering the efforts of key public and private stakeholders to co-manage cumulative impacts.

¹⁷ Steering committee is comprised of senior management representatives from the Petroleum Commission (Chair), Environmental Protection Agency, Ghana National Petroleum Company and Ghana Upstream Petroleum Chamber.

The IESC has been informed that Eni Ghana remains committed in its support the co-management platform pending resolution of the afore mentioned issues.

5.4.7 ESAP Compliance

Item 1 of the ESAP requires the development of *e) Phase-2 commissioning and production operations: by end of July 2018 or one month prior to commissioning / production operations whichever comes first*. The IESC notes that certain plans are still to be finalised, including revision/development of the following biodiversity-related plans:

- Avian Biodiversity Action Plan (see Section 10.2.2)
- Sea Turtle Biodiversity Action Plan (see Section 10.2.1)
- Wetlands No Net loss strategy (see Section 10.2.4)

The IESC considers such plans to form part of the ESHMP and for this reason considers item 1e) of the ESAP to remain 'open'.

Item 8 of the ESAP requires annual reporting of GHG emissions. This was previously left as an open item because a full year of GHG emission had not been calculated; however, the 2019 AMR includes data for the full year and consequently this ESAP item is now considered closed (complete) by the IESC.

6. PERFORMANCE STANDARD 2: LABOR AND WORKING CONDITIONS

6.1 Status update for previously identified issues

In the IESC's Q2 2019 QMR monitoring report reiterated that one issue relating to PS2, first identified in the IESC's May 2019 monitoring report, remained as an item for the Project's attention. The issue relates to the method used for the monitoring of reintegration of demobilized DAoI workers into the DAoI villages' economy and cannot be closed out based on the information provided in the AMR or the Q1 and Q2 2020 QMRs.

6.2 New PS2 findings in Q2 QMR 2020

6.2.1 H&S Performance

In the second half of 2019, several H&S incidents were reported including one Lost Time Incident (LTI) relating to a fall from a ladder. The IESC considers these to have been properly investigated with appropriate corrective measures put in place to prevent reoccurrence.

Incident statistics are presented separately in the 2019 AMR for the OCTP site and TTIP. The Occupational Health and Safety KPIs for 2019 are comparable or better than those for the preceding two years and do not raise any concerns. The IESC notes zero recordable injuries and zero lost time injuries for 2019 for the TTIP.

HSE statistics for Q1 2020 and Q2 2020 are not required to be provided in the QMR templates and therefore no commentary is provided by the IESC for the Q1 and Q2 2020 period.

No other significant new findings are reported following review of the AMR or the Q1 and Q2 2020 QMRs. The IESC is however aware that Eni Ghana has developed and is implementing COVID -19 protocols to minimise risk of transmission within the workforce and during its interactions with community members/other external parties. These protocols and their implementation will be the subject of detailed review during the next site visit.

The status of the previously identified issue, mentioned in Section 6.1 above, will be determined during the next IESC monitoring site visit, expected to occur in Q1 2021.

7. PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION

The 2019 AMR and 2020 QMRs provide information concerning resource efficiency and pollution prevention. More specifically, the AMR and/or the Q1 and Q2 2020 QMRs include sections relating to:

- Air emission and air quality monitoring;
- Greenhouse gas emissions and flaring;
- Noise;
- Liquid effluent discharges;
- Water quality;
- Drilling Fluids and Cuttings Discharge/Disposal;
- Solid waste management; and
- Management of hazardous materials.

The 2019 AMR and Q1 and Q2 2020 QMRs have been reviewed against each of these environmental aspects. Exceedances/issues of concern are highlighted accordingly below. This section also revisits issues identified during the last site visit, as reported in the May 2019 site visit report, and provides status updates where possible.

These aspects in the bullet point list above were considered in previous monitoring reports and the Sections below provide an update, with reference to earlier findings, as necessary.

7.1 Air emission and air quality monitoring

7.1.1 Flaring (and venting)

Flare and venting sources for the reporting period include:

- Flaring from the FPSO; and
- Venting from the ORF.

There was no flaring from the drill ship from July 2019 onwards following the drill ship's departure from site.

The volumes of gas released via the FPSO flare stack and ORF cold vent are presented in the table below.

Table 4: Flared and vented gas emissions resulting from process upset conditions

Source	2019 (mmscf)	Q1 2020 (mmscf)	Q2 2020 (mmscf)
Drill rig flare stack	1.818 (Q1 2019) 4.680 (Q2 2019) Zero (Q3 2019) Zero (Q4 2019)	Zero (no longer on site)	Zero (no longer on site)
FPSO flare stack	48.909 (NAG) 342.072 (AG)	9.71 (NAG) 84.75 (AG)	4.41 (NAG) 332.86 (AG)
ORF vent	17.567	6.079	4.721

The volumes of gas emitted to air via the FPSO stack and ORF cold vent are largely comparable with earlier flaring/venting volumes, except for Q2 2020 Associated Gas (AG) which is higher

than in preceding quarters. All flaring/venting was attributed to process upset conditions¹⁸ and as such is in line with the Production Phase permit (Ref. no. CE0021780607) issued by the EPA which requires flaring or venting be limited to '*operational and safety measures in the event of an emergency power or equipment failure and/or shutdown*' up to 1% of the monthly gas production volume at which point fees will be applied.

The IESC has been informed that there was no exceedance of the monthly flaring limit.

7.1.2 Air emissions monitoring

In its previous monitoring reports, the IESC has highlighted deficiencies with the air emissions table provided in the AMRs/QMRs, primarily because emissions are expressed as tonnes, rather than mg/Nm³ as per the WBG EHS guidelines, making comparison with WBG and Ghana requirements impossible without further analysis.

The format and content of the air emissions monitoring are unaltered in the 2019 AMR, Q1 and Q2 2020 QMRs and the IESC's earlier comments about the use of reporting units in line with WBG EHS guidelines remains unaddressed. Furthermore, emissions sources reported in AMRs and QMRs to date for the ORF site are the same as for construction. Eni Ghana should review major emission sources for the Production Phase, including but not limited to power generation and compressor system emissions at the ORF, and report these in the format specified in AMR and QMR templates. Eni Ghana should also demonstrate that emissions from significant emission sources are in alignment with applicable limits specified in the relevant WBG EHS Guidelines¹⁹. In order to demonstrate emissions are aligned with WBG EHS guidelines, stack emissions sampling is likely to be required.

7.1.3 Ambient Air Quality

Ambient air quality was monitored at various locations for the ORF and TTIP as per an agreed monitoring programme. The data for air quality parameters are presented in the AMR, Q1 and Q2 2020 QMRs; however, they are not available for every month because construction activities were either completed (need to monitoring no longer required) or suspended as a result of the COVID-19 restrictions. The results of the ambient air quality studies are summarised below.

ORF

For the period July 2019 through to March 2020:

- NO₂ concentrations were consistently well below the Ghana limit (150 µg/m³ for 24h period) and generally below the WBG limits for annual concentrations (40µg/m³ annual). No results are presented in Q2 2020 because sampling ceased due to COVID-19 restrictions;
- SO₂ concentrations were generally at or below the WBG guideline limit of 20µg/m³ (24 hour). Sporadic exceedances of the WBG limit in August 2019 and February 2020 was attributed to waste burning in communities. All measurements were well below the less stringent Ghana standard of 150µg/m³ (24 hour);
- PM₁₀ exceedances occurred in July, August and September 2019 and February 2020, in some instances being almost double the WBG standards. Such exceedances were attributed to nearby burning of waste by communities. Concentrations were below the less stringent Ghanaian standards;
- PM_{2.5} – not monitored; and
- Total Suspended particulates (TSP) were all below Ghanaian standards. Equivalent limits for TSP are not set by the WBG.

¹⁸ Upset conditions resulting from equipment failure and need for corrective maintenance.

¹⁹ Applicable WBG Guidelines as specified in either the General EHS Guidelines or EHS Guidelines for Thermal Power Plants depending on the size of the power generating units.

No ambient air quality monitoring took place in Q2 2020 because of COVID-19 restrictions.

Air quality monitoring locations

In its previous Q2 2019 QMR review, the IESC highlighted that ambient air sampling points were located upwind of the main Production Phase emissions sources and therefore likely to be of little use in monitoring any impacts to ambient air quality originating from the Project (Appendix 2, Issue ref. 005_5/19). The IESC made a recommendation to review the location of sampling points for Production Phase monitoring and revise monitoring locations as necessary based on the location of the main Production Phase emission sources, sensitive receptors and zones of maximum impact identified in predictive air quality studies.

Following review of the onshore air quality monitoring locations embedded within the QMRs, the IESC notes an additional ambient air quality monitoring location to the north east (downwind) of the main stacks. The presence of the new sampling location suggests Eni Ghana has acted upon the IESC's earlier recommendation, although no results are presented for this new location. The IESC assumes the absence of data to date is because sampling has been suspended due to the COVID-19 pandemic.

TTIP

Ambient air quality sampling has been conducted during construction activities at the TTIP sites, including Tema (WAPCo), Takoradi (WAPCo) and Takoradi (GNGC). As was the case for the ORF, no sampling took place in Q2 2020 due to COVID-19 related restrictions. Results of the ambient air quality monitoring for the period July 2019 to March 2020, to the extent applicable, are summarised below, with exceedances highlighted.

For the **Takoradi (GNGC)** site data are available for July, August and Sept 2019 only. Monitoring stopped at that time because construction finished, and Eni Ghana handed over control of the facility to GNGC. The only exceedance reported was the 24h SO₂ limit in August 2019 (31µg/m³ compared with the WBG guideline limit of 20µg/m³) which was attributed to use of diesel generator and other emission sources nearby during construction. Such emission sources are believed to have now stopped.

For the **Tema (WAPCO)** site the following notable exceedances were recorded:

- PM₁₀ (Sept, Nov, Dec 2019 and Jan 2020)
- SO₂ (Oct, Nov, Dec 2019 and Jan, Feb 2020)

The greatest exceedances were recorded for SO₂ in October 2019 when 71 µg/m³ was measured at the process area (compared to the WBG guideline limit of 20µg/m³). This exceedance is attributed to use of diesel generator within the process area and community burning of wastes. Other exceedances tended to be relatively minor and no clear trend was observed.

For the **Takoradi (WAPCO)**, TTIP construction activities finished in March 2019. Consequently, no commentary is provided in this report.

7.2 Greenhouse gas emissions and flaring

The 2019 AMR template includes a section for greenhouse gas emissions and flaring. The section has been completed, however would benefit from more commentary. For example, under the question 'Describe the actions taken during this reporting period for the reduction of GHG emissions, if any' the response is 'Ensured Zero Process Flaring'.

Whereas the IESC concurs that zero process flaring is the significant factor in the reduction of GHG emissions, further commentary is required to describe other actions taken to reduce GHG emissions across the Project. Cross reference should be made to the Project's GHG Accounting

and Reduction Program (pln hse 021 Eni Ghana – GHG Accounting and Reduction Program) and the implementation of measures for the management of GHG emissions described therein.

The total GHG emissions for 2019 equate to 434,590 t/year CO₂ equivalent. The IESC recognises the AMR reporting template does not request a breakdown of GHG emissions and will therefore discuss during the next site visit the relative contributions to total GHG emission, from Project activities and also work done to identify opportunities to reduce emissions.

GHG emissions are reported annually and, therefore, the QMRs do not address GHG emissions.

7.3 Noise

7.3.1 Noise (ORF)

Noise levels measured in the second half of 2019 were found to exceed WBG limits for day-time and night-time residential areas in the villages of Sanzule and Anwonlakrom, although levels were close to baseline levels. Similarly to previous exceedances, the noise was reportedly generated by waves, village activities and passing vehicles. All three noise sources cited are unrelated to the Project. In February and March 2020, elevated noise levels were recorded at 63.4 and 64.3dB(A) in Anwonlakrom. This was attributed to frequent motorbike movements, again unrelated to the Project. Noise levels were not measured in Q2 2020 due to COVID-19 restrictions except for measurements in June 2020 that are not reported in the Q2 QMR.

As previously reported, noise levels are presented for day-time hours only for industrial and residential receptors. Noise levels for residential areas are shown to be above 45dB(A) and 55dB(A) for night-time and day-time respectively, but close to baseline levels i.e. within 3dB of pre-Project noise levels and on some occasions below the baseline. As such, the measured noise levels are considered to meet WBG standards.

Based on the data provided and the IESC’s previous visits to the residential areas monitored for noise, the IESC does not believe the noise levels measured can be attributed to Project-generated sources and therefore has no concerns regarding Project generated noise impacts to nearby villages under normal operating conditions.

7.3.2 Noise (TTIP)

Noise measurements for the period starting Q3 2019 through to end Q2 2020 are summarised in the table below for the Tema (WAPCO) and the Takoradi (GNGC) site. No data are provided for Takoradi (WAPCO) because works were completed prior to the reporting period.

Table 5: Summary of noise results at TTIP sites

TTIP site	Q3, Q4 2019	Q1 2020	Q2 2020
Tema (WAPCO)	All results below the WBG industrial receptor limit of 70dB(A)	All results below the WBG industrial receptor limit of 70dB(A)	No measurements due to COVID-19 restrictions
Takoradi (GNGC)	Up to 78dB(A) on site in Q3 2019 prior to completion of works	No results (works completed)	No results (works completed)

The AMR and QMRs assess measured noise levels against WBG standards for industrial receptors 70dB(A). At the GNGC site, noise levels exceeded the 70dB(A) limit quoted in the AMR/QMRs, however the sampling locations are on site and therefore not representative of nearby offsite industrial receptors. Given the location of the Takoradi (GNGC) site and its proximity to industrial receptors the values recorded in Q3 2019 do not represent a significant concern.

At the Tema (WAPCO) site, noise levels are again compared with the industrial receptor limit of 70dB(A). Noise measurements at the nearest residential receptor located adjacent to the perimeter wall were not taken, despite recommendations made by the IESC to include measurements at the nearest residential receptor (Figure 5). Over the reporting period, noise levels ranged from 54-68dB(A) during the day-time and 52-67dB(A) during the night-time. The noise is attributed to machinery, construction cranes, vehicular movements, and plant generators with little difference between day-time and night-time noise levels suggesting operation of noise generating equipment during the night.

In the absence of empirical data for noise levels at the nearest residential receptor, and without baseline noise levels²⁰ for residential receptors, the IESC is unable to determine whether noise limits were exceeded. At the time of writing this report, construction work at the Tema site is complete and no actions are recommended. Based on grievances records provided by Eni Ghana, the IESC is not aware of any noise related complaints received during the construction period.



Figure 5: Aerial view of the Tema Regulating and Metering Station

7.4 Wastewater discharges from offshore facilities

In previous reports, the IESC highlighted exceedances against agreed Project Standards for treated sewage effluent discharges. In the May 2019 site visit report, optimisation works to improve effluent quality were reported for both the FPSO and the drill ship (the latter now demobilised). The IESC also questioned the rationale behind the Project Standards being applied, noting that they would be more appropriate for inland or nearshore waters.

FPSO

No results are provided against the Project Standards in the AMR/QMRs from Q3 2019 onwards following the concerns expressed over the applicability of Project Standards adopted for an offshore deepwater environment. Instead, reference is made to MARPOL requirements (Annex 22 Resolution MEPC 227(64)) and independent verification of Sewage Treatment Plant (STP)

²⁰ Where baseline exceeds absolute limits of 55dB(A) and 45 dB(A) for day-time and night-time respectively an increase of up to 3dB is permissible.

performance. The IESC confirms the FPSO has a valid certificate, due to expire in 28th February 2022, that meets the standards of MEPC.159(55) and MEPC.227(64).

No produced water was discharged to sea during the reporting period.

Drill Ship

Not applicable due to demobilisation in June 2019.

7.5 Wastewater discharges from onshore facilities

ORF

The Q1 2020 QMR reports that, '*Effluent monitoring for 1Q 2020 was not undertaken due to COVID-19 pandemic. Monitoring will resume once the pandemic resolves*'. The Q2 2020 QMR is silent about liquid effluent discharges from the ORF, presumably because problems caused by the COVID-19 pandemic persist. Future QMRs and AMRs should provide more information concerning liquid effluent management, including tabulated comparison with applicable Project Standards for the now operational ORF.

7.5.1 Surface water quality

The QMR/AMR templates require water level data for community wells and ambient water quality data, provided to the EPA, to be presented. Water quality results are provided for the GW_02 location only – this is the sampling location adjacent/within the village of Anwolakrom.

The IESC recommends closer attention is given to the information requested in the AMR reporting template and data provided to the EPA should be included in future AMRs.

7.5.2 Drilling Fluids and Cuttings Discharge/Disposal

In June 2019, drilling activities ceased following completion of the final infill well (OP-10). Commentary on drill fluids and cuttings disposal has been presented in previous IESC reports, however it is not relevant to this report following cessation of drilling activities in June 2019.

7.6 Solid waste management

The IESC is familiar with the Project's waste management practices from earlier site visits. Documentation review during the preparation of this report does not indicate any deviation from earlier practices and thus waste management continues in line with the Project's Waste Management Plan. Reputable waste contractors (ZOIL and ZEAL) are contracted and have relevant permits in place. On the understanding that there has been no significant change, other than the reduction in the volume of waste generated following end of construction and demobilisation of the drill ship in Q2 2019, no further commentary on waste management practices is considered necessary.

The IESC does however note Eni Ghana's efforts with respect to waste recycling through the launch of a Plastic Waste Recycling (Circular Economy) Initiative. The initiative was formally launched in local communities in February 2020²¹ and involves the collection of plastic debris from the environment (primarily the beach) and subsequent segregation and transfer of collected plastic waste to a recycling company on a commercial basis. The initiative potentially has several benefits, including income generation and environmental improvement (see Section 10.2.1).

The IESC understands the initiative was well received by community members but was unfortunately put on hold due to the outbreak of the COVID-19 pandemic.

²¹ The initiative's concept had also been presented to community leaders in September 2019

7.7 Offshore Environmental Monitoring

The IESC previously reported its findings following review of a second set of construction phase offshore survey results in November/December 2018. No offshore monitoring campaign took place in the reporting period, hence no specific commentary in this report. The IESC does however note that the Environmental Monitoring Program (EMP)²² states the '*frequency [of monitoring campaigns] to be reviewed after analysis of 3 years results*'. At this time, Eni Ghana has confirmed its intention to commission a further offshore monitoring campaign during the first half of 2021. The scope of this future campaign is not known at the time of writing and it is therefore recommended that the scope be further considered during the next site visit.

²² Environmental Monitoring Program, pIn ms hse 018 eni ghana – Environmental Monitoring Program r01

8. PERFORMANCE STANDARD 4: COMMUNITY HEALTH, SAFETY, AND SECURITY

8.1 Status update for previously identified issues

In the IESC's Q2 2019 QMR monitoring report, two issues which were raised in previous IESC monitoring reports were identified, again, for the Project's attention. These two issues are:

- Status of the Security Management Plan (SMP); and
- Fishery-based incursions into offshore exclusion zones.

Also, in the IESC's May 2019 monitoring report, the potential need to relocate community members living near the Tema Regulating Metering Station was identified as an issue.

The IESC's review of the 2019 AMR and the Q1 and Q2 2020 QMRs has resulted in no material additional information being provided with respect to the SMP's status, therefore, this issue remains unchanged. New data on fishing vessel incursion are presented; however, the data do not materially affect the status of the issue as indicated in previous IESC monitoring reports: it remains a matter of significance from a PS4 community health and safety perspective.

8.2 New PS4 findings in Q2 2020

8.2.1 Security and the Security Management Plan

All security at all Eni Ghana project related sites is provided by a single company, G4S. The security guards are unarmed. The Q1 and Q2 QMRs both mention that monitoring of fishing vessel incursions into offshore exclusion zones, essentially the zone around the FPSO, is undertaken by the patrol vessel 'Python' which is deployed daily. There are 2 Fishery Liaison Officers on board who are authorized to interact with fishers to attempt to prevent incursions and/or encourage fishers to leave the exclusion zone.

Eni Ghana still maintains its long-term goal of the Ghana Navy being deployed to patrol all its offshore oilfields and facilities. An MoU has been under discussion for at least two years, but agreement has not yet been reached.

No grievances related to deployment and/or behaviour of security personnel were and no security incidents were recorded received by Eni Ghana for Q3 and Q4 2019 or for the period up to end June 2020.

There is no mention in the AMR and the Q1 and Q2 QMRs 2020 of a revised SMP having been approved by the WBG/issued; however, the IESC understands the Production Phase SMP was finalised and then approval by the WBG in mid-November (coinciding with the issue of this report).

8.2.2 Fishery-based incursions into offshore exclusion zones

Eni Ghana has continued collecting and presenting monitoring data on the number of fishing vessel incursions into the 500-metre exclusion zone around the FPSO.

The cumulative number of incursions by mid-May 2019 reached almost 1,800. By the end of the third week of December 2019, the cumulative total for 2019 had reached almost 3,700 (Figure 6) an increase of almost 108% during the period July of December; however it is noted that there were 0 incursions recorded for a 6 week period over the months of May and June coincided with the imposition by the Government of Ghana of a "closed season" ban on artisanal and inshore fishing in the country's coastal waters.

By the mid-May 2020, the year-to-date cumulative total number of incursions was almost 1,900²³. Overall, the data for May year-to-date for both 2019 and 2020 respectively indicate a relatively similar level of cumulative incursions (with a slight increase in 2020 compared to 2019). The data show that these incursions continue to be a significant problem.

Eni Ghana should continue its monitoring efforts and it is recommended that it extends its analysis and reporting, in both QMRs and AMRs, to encompass trends in the number of incursions (taking seasonal effects into account), data on the origin of vessels (including ownership details) entering the FPSO exclusion zone, in addition to presenting cumulative totals for defined time periods. In addition, the IESC reiterates its previous recommendations that Eni Ghana continues to seek effective means of reducing incursions.

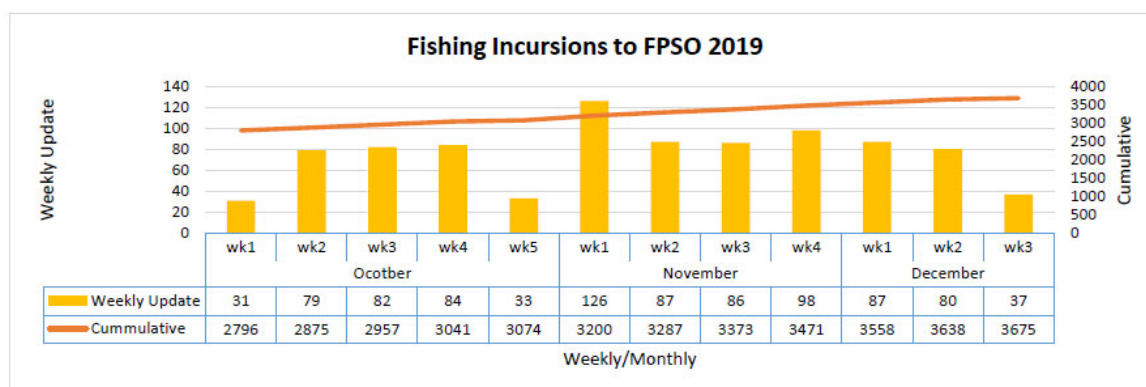


Figure 6: Fishing incursion data for Q4 2019

8.2.3 Potential relocation community members living near the Tema Regulating Metering Station (RMS)

In previous monitoring reports, the IESC highlighted the potential need to relocate community members living near the Tema RMS (May 2019 IESC monitoring report). Such potential relocation could have resulted from an unacceptable risk to community members from fire and explosions under higher operating gas pressures.

In order to reduce the risk, Eni Ghana redesigned (optimized) the facility, such that operational needs could be met with lower gas pressures. The new facility design was much simplified, requiring the addition of a new train and a lower operating pressure of 52 barg (compared with 120 barg in the original design) to address the earlier concerns about potential fire and explosion risk to neighbouring residents.

A Quantitative Risk Assessment (QRA) study was commissioned for the optimized Tema RMS design²⁴. The QRA study confirmed that the area of intolerable risk to the external population was entirely within the plant’s boundary i.e. there were no residential properties located in the ‘intolerable risk’ zone. The study does however conclude a level of societal risk and consequently recommends further risk reduction measures for consideration by the site operator (WAPCo) and relevant authorities, including *inter alia*:

- confirmation that the construction index of buildings in certain areas close to the site boundary fence are within the permissible construction index limit of 1m³/m²;
- Application of good practice monitoring and maintenance; and
- Stakeholder (community) engagement.

Based on the conclusions of the QRA study the IESC considers this issue to be closed.

²³ This figure was obtained by adding the cumulative totals for Q1 (1088) and the Q2 period of April to mid-May 2020 (800).

²⁴ Report entitled TEMA IRS – Quantitative Risk Assessment was finalised in February 2020

9. PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

9.1 Status update for previously identified issues

In the IESC's May 2019 site visit report, two issues relating to PS5 were identified for the Project's attention with recommendations provided. These two issues are:

- At the time of food aid termination, about 20% of PAPs had not, "...officially started to generate revenue..."; and
- Certain sites selected for LR Programme Support Services options may have caused environmental harm to forested areas/swamps resulting in habitat loss.

Following review of the AMR and the Q1 and Q2 2020 QMRs, the status of both issues has changed as the recommended measures to either eliminate the issues or reduce their significance to an acceptable level have been implemented, as presented below.

9.2 New PS5 findings in Q2, 2020

9.2.1 Livelihood Restoration: Monitoring and Evaluation

In August 2019, Eni Ghana issued a Monitoring and Evaluation Plan which was aimed at assessing the performance of both the LRP and the LDPj – CIS to ensure that their implementation was compliant with/achieving the outcomes of the Performance Standards, especially in relation to PS5. In terms of the LRP, key objectives are to:

- Validate and measure the LRP KPIs to monitor effects of LRP implementation and evaluate the result;
- Ensure LRP actions are implemented fully and on time; and
- Ensure that LRP actions are effective in, at minimum, restoring the livelihoods of the land-affected people.

At the same time a training event was organized for, primarily SLC personnel who would be most closely involved in the monitoring and evaluation work.

The Plan specifies the frequency of LRP monitoring activities such as quarterly internal audits and site visits and, also, of reporting of results by *inter alia* the SLC's monitoring and evaluation team and by LRP contractors. In December 2019, Eni Ghana designed and developed a tracking matrix to monitor implementation of Phase 2 of the LRP. The intended key focus is the livelihood options that are operational and generating revenues.

The 2019 AMR and the Q1 and Q2 QMRs do not contain any embedded documents that provide the results of quarterly internal audits for the period from July 2019 to end June 2020. However, other reports/documents have been prepared providing data that can be used to ascertain LRP performance (Section 9.2.3).

9.2.2 LR Programme Support Services

The 'Support Services' component of LRP implementation is being undertaken by TNS. TNS was appointed for the duration of the 3-year period (February 2018 to January 2021) allocated for the 'Support Services' component.

The 'Support Services' component began approximately 15 months prior to the termination of the transitional support - food aid. The 'Support Services' component has the aim of providing the PAPs (recipients of the food aid) with adequate opportunity to re-establish their livelihoods. It was intended that PAP incomes would arise from successful implementation of a series of income-

generation activities (such as egg production and aquaculture) under two sets of options which came into effect sequentially; first, Option 1 and then Option 2. First, all PAPs chose an activity under Option 1 and, certain categories of PAPs, chose an additional second activity under Option 2. The expectation was that each PAP would be able to restore his/her livelihood by means of generating sustainable income streams from managing at least one and, for certain PAPs, two income-generating activities.

As mentioned in the IESC's May 2019 site visit report, an external consultant (Wood/Synergy Global Consulting Ltd) undertook an external interim audit of LRP implementation between 23 April and 3 May 2019. The interim audit report identified several 'implementation risks' amongst which were:

- Termination of Transitional Food Aid Support creating potential for some PAPs failing to restore their livelihood (if not able to be in receipt of sustainable benefits stream from selected livelihood restoration options at time of cessation of the Food Aid Support); and
- Monitoring & Evaluation reports focus only high-level indicators (TNS and Eni Ghana monitoring reports only include averages for all PAPs) and there is no specific focus on vulnerable PAPs or those facing difficulties in restoring their livelihoods.

In April 2019, Eni Ghana and VUGL undertook a validation study to, "...verify and confirm whether the 1st options were set up and producing or ready to produce and in which time frame." The validation report stated that about 20 % of PAPs had not, "...officially started to generate revenue..." due to a range of differing internal (at household level) and external factors.

A key aspect of the 'Support Services' component has been not only a focus on establishing the income-generating activities and ensuring that incomes are generated, but also implementation of a programme of continuing monitoring of individual PAPs/options and periodic evaluations of its overall community-wide performance.

Monitoring work continued throughout the COVID-19 pandemic period in Q1/Q2 (including visits to Option 1 and 2 sites: mostly Option 2 sites) while obeying government-imposed restrictions. Just before the pandemic restriction were imposed, a 'refresher' training event was held in the period 03 to 07 February 2020 on financial management and cluster development for both Option 1 and 2 PAPs.

The monitoring/evaluation results are presented below in the section on *Evaluation of Livelihood Restoration Progress* below.

Options Handover

Installation of 99.7% of all Option 1 and Option 2 choices was completed by end June 2020 (in fact 99.7% was completed by end of 2019). The missing item (0.3%) was completion of a fishpond for aquaculture, which has been 'ongoing' for at least 6 months (time taken was due to seasonal reasons hindering the filling of the pond to the optimal level). In fact, by October 2019, the completion level was 88% and, again, the non-completion of fishponds was the main factor preventing 100% completion being achieved.

There have been several PAPs changing options. For example, by February 2020, 17 out of 43 PAPs who selected aquaculture, as an Option 1 choice, left this option and focused on managing their Option 2 choice or pursued other revenue-generating activities, some outside the scope of the LRP, for example, 2 PAPs have sold all their pigs; one of whom had invested the money received in a motor-cycle transport business (a non-LRP activity).

At the time when Option 1 sites were completed and Option 2 sites were being installed, TNS initiated a formal procedure whereby PAPs may 'handover' their options (in particular their starter packs) to a member of their household, another PAP or a specific third party such as the Sanzule

Traditional Authority. The procedure was initiated by the Livelihood Restoration Working Group (LRWG); and the LRWG validates each handover, which requires signatures on a handover document of all parties involved in the handover. There are two types of handover:

- Voluntary: when a PAP decides that he/she wishes to change an Option or leave the 'Option' component of the livelihood restoration programme; and
- Mandatory: when a PAP is considered be mis-managing his/her Option. In this case the handover may be to a household member, another relative or to the Sanzule Traditional Authority.

Overall, Eni Ghana estimated that fewer than 10% of the total number of PAPs have been involved in this handover procedure.

9.2.3 Evaluation of Livelihood Restoration Progress

During the period July 2019 to end June 2020, three monitoring and evaluation reports were issued, as follows:

- Two reports: first report focusing on Option 1 with data from July 2019 and then the second report focusing on Options 1 and 2 with data from November 2019); and
- One report focusing on a specific category of options (vocational/training/continual cropping) in July 2020 (based upon data from the preceding months).

In August 2019, Eni Ghana issued the first of these reports, 'Report on Monitoring and Evaluation of Livelihood Restoration Plan (LRP) Implementation (Option 1).' The work done to prepare the Report was undertaken at a time when Option 1 was 99% completed (almost all starter packs had been distributed) – July 2019. The three objectives of the work undertaken are summarized below, as follows:

- Evaluate PAP performance PAPs with respect to their capacity to generate revenue and follow up on the status of the vulnerable PAPs;
- Assess the development of PAPs, especially their income earning capacity (training, skills and knowledge); and
- Identify issues and provide recommendations for the successful implementation of the LRP Support Services.

This report was followed by a later report, issued in February 2020, which covered both Options 1 and 2, but based on data from November 2019. This 'November' report shared the same objectives (as above) and methodology as the 'July' report. The study methodology is a mix of quantitative and qualitative approaches. The quantitative approach consisted of analysis of revenue data collected regularly by TNS, for all PAPs, and a survey of a sample of 30 PAPs with a primary focus upon those PAPs classed as being highly impacted and vulnerable, but including, also, individual PAPs from other PAP categories. The breakdown of the 30 PAPs is: 16 highly-impacted, of which 11 are vulnerable PAPs; 9 partially-impacted; and 5 livelihood-unaffected PAPs (PAPs losing land, but with no dependency on this land for livelihood purposes and who are only allowed to choose from one of the two sets of options). This focus upon vulnerable PAPs is a clear demonstration of Eni Ghana's efforts to manage one of the 'implementation risks' identified by the Interim Audit of LRP implementation (cited above).

The qualitative approach consists of focus group discussion with TNS personnel, the LRWG and Eni Ghana's livelihood restoration and monitoring specialists, but not PAPs. Constraints faced in the work, such as the unwillingness of some PAPs to divulge revenue/income data, are described. Although this is not stated explicitly in the report, the implication is that the accuracy of some of the data and, therefore, the results obtained, should be treated with caution.

These two similar reports represent the first systematic attempt to monitor and evaluate LRP performance, in terms of restoring/enhancing livelihoods, and to present the results. Despite the acknowledged constraints; these reports do indicate that, overall, Option 1 and Option 2 activities were beginning to generate revenues and that some PAPs were clearly being successful in term of income generation. Also, they showed that there was no sign that vulnerable PAPs were performing worse than non-vulnerable PAPs, in fact on some metrics they performed better. Unfortunately, since the 'November' report there has not been a similar report prepared to enable the results obtained, from using a standardized methodology, to be compared over time to enable the performance of the LRP 'Support Services' component to be tracked.

In July 2020, a monitoring and evaluation report was issued which focused on the following options (1 and 2): continuous cropping, value addition and processing, livestock production, aquaculture production and various vocational and technical revenue generating activities such as hairdressing, carpentry, and welding. This report does not provide disaggregated results that capture vulnerable PAPs. Also, as it only covers a category of the available options it is not possible to compare the results with the 'July' and 'November' 2019 reports.

In addition, over the period July 2019 to end June 2020; Eni Ghana has prepared, periodically, a series of worksheets (for both Options 1 and 2) and for a) all PAPs and b) vulnerable PAPs. These worksheets present data on the following four indicators:

- Number of options that are operational;
- Number of options that are not operational;
- Number of options that are generating revenue; and
- Number of options that are not generating revenue.

The 'all PAP' and 'vulnerable PAP' worksheets are updated monthly. In response to an IESC request Eni Ghana provided worksheets for specific months in H2 2020 and for the period up to the end of August 2020. These worksheets enabled a comparison to be made over a period of several months, which allowed trends may be detected for both 'all PAPs' and 'vulnerable PAPs' and the two trends to be compared for overlapping time periods.

In Tables 6 and 7 below the results are presented for '**all PAPs**' and '**vulnerable PAPs**' for the period November 2019 to August 2020 and from February 2020 to August 2020 respectively (although the data are presented in reports which have a date (August) outside the IESC's reporting period the data refer to preceding months and are included here to assist in indicating if there are any trends that can be detected for these two distinct time periods).

OFFSHORE CAPE THREE POINTS

Table 6: All PAPs: Options 1 and 2 Status – November 2019, April 2020 and August 2020

Option	Date	Number of PAPs under each option	Number of options that are operational	Number of options that are not operational	Number of options that are generating revenue	Number of options that are not generating revenue
Option 1	November 2019	Not provided (but assumed to be 213)	174	39	166	47
	April 2020	213	158	57	145	68
	August 2020	213	143	69	138	75
Option 2	November 2019	132	107	25	85	48
	April 2020	132	107	25	89	43
	August 2020	132	86	46	84	48

Table 7: Vulnerable PAPs: Options1 and 2 Status – February, May and August 2020

Option	Date	Number of PAPs under each option	Number of options that are operational	Number of options that are not operational	Number of options that are generating revenue	Number of options that are not generating revenue
Option 1	February 2020	36	31	5	21	15
	May 2020	36	30	6	23	13
	August 2020	36	31	5	21	15
Option 2	February 2020	36	35	4	26	13
	May 2020	36	35	1	22	14
	August 2020	36	28	6	28	4

The status of Options 1 and 2, for **all PAPs** (213), over the period November 2019 to August 2020, is shown in Table 6. For Option 1, there has been a 77% increase (39 to 69) in the number of options that are not operational accompanied by a smaller 60% increase (47 to 75) in the number of options not generating revenues. For Option 2, the numbers of the options that are not operating and are not generating revenues have barely changed since November 2019. However, there was a reduction in the number of operational options (from 107 to 86) and a corresponding rise in the number of non-operating options.

For all **vulnerable PAPs** and for Options 1 and 2, Table 7 shows that most options were operational in February 2020 and this continued up to August 2020 except for a decline in the number of operational Option 2 options from 35 to 28. Table 7 shows, also, that for vulnerable PAPs with Option 1 options there was no status change: essentially, out of 36 options; 5 options were not operational; 21 options were generating revenues and 15 options were not generating revenues over the entire period. In contrast, the data regarding Option 2 options show a noticeable change in option status with a reduction from 13 to 4²⁵ (in terms of the number of options not generating revenues).

Overall, for **all PAPs** there is no clear trend showing any increase in the number of options that are operational or which are generating income. In fact, for Option 1 options, there is a noticeable decline in the number of operational options and, similarly, an increase in the number of options not generating income. These results would seem to indicate that there may be an increasing number of PAPs experiencing delays in restoration of their livelihoods. This is concerning given that the LRP Support Services will cease in January 2021. Similarly, for **vulnerable PAPs** there is no clear sign yet of an increase in the number of Option 2 options that are operational, or which are generating income. Instead, there has been a decrease in the number of Option 2 options which are not generating revenue.

As mentioned above, at the time of food aid termination (April 2019), about 20% of PAPs had not, "...officially started to generate revenue..." and this issue was raised as an issue in the IESC's May 2019 monitoring report. Currently, the figures show that, for **all PAPs** with Option 1 options, currently 35% of options were not generating revenues and for Option 2 options the figure was a similar 36%. For **vulnerable PAPs**, 42% of Option 1 options were not generating revenues; while the corresponding figures for Option 2 options was 11% (this figure may, in reality, be higher see above).

Overall, the proportion of options that are not generating revenues has increased from the 20% finding in Q2 2019. The IESC recognizes that the number of options that are operational and generating revenues has increased significantly and that many PAPs are generating revenues (with some generating significant revenue amounts); nevertheless, progress toward restoration of livelihoods across all PAPs (including vulnerable PAPs) is encountering challenges in ensuring that they are generating revenues for all PAPs. The increased focus on monitoring and evaluation, accompanied by remedial measures has not only been unable to reduce the 20% proportion of all PAPs, not generating revenues, it has not managed to prevent the proportion increasing over time.

The reasons for the overall trend, showing no change in status or decline in terms of the number of options being operational and generating revenues, are not clear. LRP monthly reports record the detrimental effect of COVID-19 pandemic on trading and hence revenue earning for PAPs following certain options. Such reports prepared in the period March to June 2020 (when COVID-19 restrictions were in force,) record low-revenue generation for a range of options, such as carpentry shops and food vending businesses. In June 2020, 27 option sites were visited and 25

²⁵ This figure may be a little higher as 28 plus 4 options equals 32 and not 36 options.

PAPs reported, “...low revenue generation due to the COVID 19 pandemic...” However, the data in Tables 6 and 7 do not show a negative COVID-19 effect for the period February to August.

Another possible reason is the delays that have occurred/continue to occur in connecting those PAPs, which require electricity to enable their options to function, to the electricity network. As recorded in the May 2019 IESC monitoring report, many Option 1 sites required connections to the grid and work was continuing at that time to complete the necessary connections. Subsequently, many Option 2 sites also needed such connections. Following contact with Eni Ghana, the IESC was informed that in mid-September 2020, 25 PAPs (all Option 2 options) were waiting for connections. Such delays in establishing connections are significant as they hinder PAPs’ ability to generate revenues. It is noted that solar panels have been established at certain option sites as a replacement measure.

Given that the LRP Support Services component will end at end January 2021, some local stakeholders have expressed a view, in meetings with Eni Ghana, that it should be extended. In response to such views, Eni Ghana is informing stakeholders that the LDPj - CIS will be in place from early 2021 and that all PAPs are invited to apply to participate in LDPj – CIS interventions, as are all members of the 10 communities that are within the scope of the LDPj - CIS. It is intended, by Eni Ghana, that the LDPj - CIS will provide additional benefits streams to all community members, including PAPs and their dependents who will continue to benefit from the income streams generated by their chosen options, once the external support provided by the LRP Support Services component ceases.

There are significant challenges facing Eni Ghana’s efforts to restore livelihoods, prior to the ending of the LRP Support Services component of LRP implementation at end January 2021. Given the uncertainty created by COVID-19 and the reliance on third parties such as the electricity provider, it is recommended that Eni Ghana reinforce its efforts to assist those PAPs not generating any revenues and, also, consider preparing an LRP Exit Strategy (focusing, for example, on the continuation of current actions and/or new actions), for ensuring livelihood restoration for PAPs if future monitoring and evaluation results show that the objective of livelihood restoration cannot be achieved by end January 2021.

Managing E&S Impacts

In October 2019, TNS prepared and began to use an ‘Environmental and Sanitation Procedure’ to assist in site selection for LRP options. This Procedure is supported by a set of Guidelines and an ‘Environmental and Social Appraisal Form’, The Form is based upon a checklist of environmental factors with accompanying questions. A Form is completed and then used to make decisions on site selection (the Form is used for each alternative site).

The Procedure focuses on aims/objectives, on four Option types (pig-rearing, sheep-rearing, poultry-keeping and aquaculture) considered to pose the most significant risk environmental harm (there is an emphasis on waste management/disposal issues) and a list of the types of impacts of concern. Also, it sets out a monitoring programme. The Procedure does not address issues such as allocation responsibilities for completing the Forms, review and sign-off. Importantly, there is no mention of who makes the final decision based upon the Form/s.

Although application of the Procedure /Appraisal Form has occurred relatively late in the LRP Support Services programme (after many sites have been developed), the Form is a welcome development and should assist avoidance and/or minimisation of unnecessary adverse environmental (for example, harm to forested areas/swamps resulting in habitat loss) and social impacts from livelihood restoration activities even though most sites were selected prior to its use. The continued need for application of this Procedure will be assessed during the forthcoming IESC site visit, expected to occur in Q1 2021. Should a continuing role for the Procedure be identified then, as necessary, recommendations to improve it will be presented to Eni Ghana.

10. PERFORMANCE STANDARD 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

10.1 Status update for previously identified issues

In the May 2019 IESC site visit report, seven issues were identified that required either corrective action or verification of completion. The AMR and QMR reports do not provide information that allows the status of these issues to be changed, however calls with Eni Ghana biodiversity specialists has allowed discussion on these issues and some progress in providing status update.

The IESC is aware that the Avian and Sea Turtle BAPs for the Production Phase are in the process of being finalised and that the actions therein may differ from those existing BAP actions which have informed this current review. For this reason, no new issues have been opened relating to BAP actions at this time.

The IESC proposes to review and assess compliance against these documents once finalised during the next IESC monitoring visit, tentatively planned for Q1 2021.

10.2 New PS6 findings in Q2, 2020

10.2.1 Sea Turtle Biodiversity Action Plan

Updated Production Phase BAP

The Q1 and Q2 2020 QMRs indicate that the update to the Sea Turtle BAP, which is being undertaken to reflect progress involving Flora and Fauna International²⁶ (FFI) and the Eni HQ biodiversity team, has been drafted and implementation remains ongoing, though the BAP is still being finalised and comments addressed following review by the WBG. During a call with Eni Ghana on 30th September 2020, it was confirmed that the updated Sea Turtle BAP is to be finalised by October 2020. In the meantime, Eni Ghana indicated that all mitigation and monitoring actions from the previous version of the Sea Turtle BAP (including hatchery development, community education and bush meat survey) were implemented during the reporting period, as outlined below.

Monitoring

The 2019 AMR Report indicates that Ghana Wildlife Society (GWS) conducted the following sea turtle monitoring activity in 2019:

- Ongoing monitoring of nesting and non-nesting emergence of turtles;
- Night surveys/Dawn surveys from Eikwe to Bakanta; and
- Direct observation of presence of turtles (adult and hatchlings).

A Composite Sea Turtle Monitoring Report was provided to verify this. In the composite report it was noted that nine sightings were made across a total of 140 days survey effort in 2019; eight sightings of olive ridley and one green turtle. The frequency of sightings remains low compared to the baseline sighting frequency. Most nesting activity observed in 2019 occurred in August (in contrast to reported frequency for 2017 and 2018, when most nesting activity appeared to occur in September and October), and six nests were recorded in 2019.

The Q1 2020 QMR indicates that sea turtle monitoring activities were performed by GWS in January and February 2020, with the next survey (by ESL) in August 2020, in line with the monitoring schedule (though the latter survey is not within the period covered as part of the current review). Two 2020 sea turtle monitoring reports were provided for review, however,

²⁶ Flora and Fauna International is a UK based consultancy contracted to provide specialist biodiversity support to Eni Ghana.

these contain only information relating to the survey conducted by GWS in January 2020 and the one conducted by ESL in August 2020. No report for the February 2020 survey was provided for review. The January survey recorded one instance of olive ridley nesting and indicated that the turtle returned to sea successfully after the event.

Going forward, the IESC recommends that the AMR and QMR reports discuss survey effort for sea turtles and avifauna separately to avoid any confusion relating to which group was the subject of survey in any given period.

Hatchery development

The 2019 AMR report indicates that GWS commenced hatchery construction in 2019 in accordance with the existing Sea Turtle BAP and have constructed three new hatcheries at Eikwei, Krisan and Bakanta, though it is understood from the Composite Sea Turtle Monitoring Report that no nests have been translocated to these hatcheries to date. Hatchery photographs have been provided (Figure 7). It is expected that ESL, who have taken over the sea turtle monitoring contract, will be responsible for staffing these hatcheries going forward. This expectation will be clarified in the finalised updated Sea Turtle BAP.



Figure 7: Bakanta Turtle Hatchery constructed during 2019

Beach Clean-up

The 2019 AMR report details a beach cleaning initiative that took place on 31st January 2019 at the shore close to ORF. It involved adjoining communities, Eni Ghana, contractors, authorities and a waste management contractor. Over 11,300 kg of waste was collected, including 500 kg of plastic and has led to the development of a Plastic Waste Recycling Initiative. The beach cleaning event was reported to be very successful and it is understood that the Plastic Waste Recycling initiative is replacing the beach clean-up initiative, in order to reduce plastic waste on the beach in the first instance. This activity is in line with the BAP Additional Conservation Actions and begins to address the increased levels of beach litter noted by turtle surveyors over the total monitoring period since 2016.

The beach cleaning and plastic recycling initiative is relevant to both the Sea Turtle and the Avian BAP. The Q1 2020 QMR reports that community leaders were given an introduction to the Plastic Waste Recycling Initiative at Eikwe Community Palace on 4th March 2020. Both the Q1 and Q2

2020 QMRs state that the Plastic Waste Recycling Initiative was then put on hold due to outbreak of the COVID-19 pandemic.

Community Awareness and Education

During a call with Eni Ghana on 30th September 2020, Eni Ghana confirmed that they continued to have ongoing consultation relating to the BAP action to improve community awareness of the ecology of sea turtles and threats to sea turtle species and are taking into account COVID-19 measures. GWS had previously conducted education and awareness sessions in communities, as reported in the Composite Sea Turtle Report, however since the recent appointment of ESL they will take on responsibility for this action. Further clarity will be sought relating to the ongoing status of this action during IESC review of the Sea Turtle BAP, planned for the next site visit in Q1 2021.

Beach Surveillance

No specific information on beach patrols has been provided as part of the AMR and QMR reports, however during an IESC call with Eni Ghana on 30th September 2020 it was clarified that beach patrols for sea turtles are occurring as part of the ongoing monitoring activity by ESL Consulting. It was stated that there is no possibility of enforcement action during these patrols; rather the goal is to discourage poaching and educate the local population. These patrols are also used to detect nesting locations that may be at risk of poaching or other physical disturbance and therefore warrant relocation to one of the constructed hatcheries. Direct evidence of poaching was noted on two occasions in 2019. This contrasts with the construction period (16 reported poaching incidents in the 2017-2018 period), though is a similar number to that reported during baseline surveys (4 reported incidents in the 2015-2016 period).

Staff Training

The QMR and AMR reports do not detail any records of staff training specifically in relation to sea turtles. Eni Ghana indicated on a call on 30th September 2020 that training was being implemented on an ongoing basis, including an anti-poaching awareness campaign and staff education, including training presentations. No documentary evidence was provided for review during preparation of this report; however, such training materials have been provided during earlier site visits. The IESC recommends the documentation and reporting of biodiversity-related training going forward.

Bush Meat Survey

10.2.2 No information is included in the 2020 QMR and 2019 AMR reports relating to the bush meat survey, which was an Additional Conservation Action (ACA) in the Sea Turtle BAP, with the aim of identifying the active turtle trade route in the Project area. This ACA did, however, take place during the reporting period and the results of a Turtle Meat Survey conducted by GWS have been provided for review. The survey identified that that active harvesting and trade in turtle meat is ongoing and linked to a decline in fish catch, since turtle is an alternative source of income. Most poaching occurs from nesting beaches, with a smaller amount from fisheries bycatch. The trade was found to involve individual community members, local food vendors and market women from the surrounding communities and that trade is primarily within the local communities, including the nearby market at Ainyinase. It is understood by the IESC that this information will be used in the design of the community awareness programmes outlined in the section above. Avian Biodiversity Action Plan

Updated Production Phase BAP

The Q1 2020 QMR indicates that the update to the Avian BAP involving FFI and Eni HQ biodiversity team has been drafted and implementation remains ongoing, though the BAP is still

being finalised following WBG review. During a call with Eni Ghana on 30th September 2020, it was confirmed that the updated Avian BAP is to be revised by the end of October 2020. It is understood that this allows for additional consultation to allow greater certainty on the ACAs for shorebirds and what will be technically feasible. In the meantime, Eni Ghana indicated that the actions from the previous version of the Avian BAP were being implemented on an ongoing basis, as outlined below.

Monitoring

The 2019 AMR report indicates that avian monitoring was conducted by GWS in accordance with the existing BAP throughout 2019. A composite monitoring report from 2019 and a 2020 report were provided to verify this in relation to shorebirds and relate to shoreline monitoring within the Project Area of influence (AoI) and at the Amansuri estuary. According to the BAP, monthly monitoring is required but according to the composite reports, monitoring did not take place every month during the reporting period. The only monitoring indicated in Table 1 of the composite reports is for the months of February 2019 and July 2019 to January 2020 inclusive, thus appearing to indicate that monitoring did not take place during the March-June 2019 period or after January 2020. The Composite Shorebird Monitoring Report for 2019 verifies that monitoring took place almost monthly in 2017 and monthly in 2018 but does not demonstrate that the same schedule was followed during 2019 or in the pre-COVID-19 period of 2020. A monitoring schedule has been provided by Eni Ghana to indicate that future surveys are planned to take place on a monthly basis.

The 2020 composite shorebird report indicates that an increase in the population of International Bird and Biodiversity Area (IBA) bird species during the peak seasons could be considered as a sign of species recovery following the ORF construction (assuming that 2018 monitoring results were not simply collected on atypical days, the 2020 composite report suggests a significant reduction in bird numbers during the construction period monitoring in 2018, but that numbers now appear to have recovered to approximately 50% of the baseline sanderling and 70% of the royal tern baseline). The report also acknowledges that further monitoring will be required to confirm this. It is noted that existing disturbance activity at the estuary (fishing and vessel movements) has not changed. The 2020 composite report indicates that sandbars are now not covered with seawater at low tide, allowing birds access to these areas. This appears to indicate a recovery of these areas since 2019, when they were inaccessible at low tide following dredging by a private developer.

The composite shorebird monitoring reports do not indicate any activity relating to the other monitoring actions in the existing BAP, including the yearly update of IBA State, Pressure and Response data.

The Avian BAP includes an action to conduct surveys in June and November each year. No reporting for this specific action is included in the QMR and AMR reports, however Eni Ghana has indicated that vulture monitoring did take place in January and November 2019, as reported in the post-construction survey (see Section 10.2.3 below). The results of this survey indicated that the roosting sites of the hooded vulture among the coconut trees in and around the ORF have remained intact and there appears to be no noticeable departure from the pre-construction status of this species in the area. The information provided in the post-construction survey report does not however demonstrate compliance with the stated BAP action to monitor the vulture population in June and November each year recording key parameters including group size, life stage and behaviour. During the process of this review, Eni Ghana have provided a monitoring schedule indicating that surveys going forward will adhere to the June and November schedule.

Similarly, no reports have been provided which demonstrate that the biannual (June and December) forest bird surveys are taking place in accordance with the existing BAP and Eni

Ghana have confirmed that none have taken place during the reporting period. The information provided as part of the post-construction survey report (see Section 10.2.3 below) is limited to an indication that all forest bird species of global conservation concern that were recorded in the pre-construction survey were also recorded in the post-construction assessment, with the notable exception of grey parrot, which was not recorded during the post-construction survey. Eni Ghana have provided a monitoring schedule indicating that surveys going forward will now adhere to the June and December schedule for forest birds.

Community Awareness

The 2019 AMR reports that stakeholder sensitisation with community leaders in the Project AoI was conducted on the theme of on 'No Hunting and Burning' around the ORF Gas Plant and Gas Pipeline on 21st and 22nd November 2019. Eni Ghana confirmed on a call on 30th September 2020 that they are looking at re-engaging with the community regarding the vulture conservation programme and further confirmed that they will not be performing any artificial interventions such as vulture restaurants, which were suggested as an ACA option to be explored in the existing Avian BAP. Such suggestions are therefore expected to be removed in the final updated Avian BAP.

Staff Training

The QMR and AMR reports do not detail any records of staff training specifically in relation to birds. Eni Ghana indicated on a call on 30th September 2020 that training was being implemented on an ongoing basis, including training presentations, however no documentary evidence was provided for review during the preparation of this report. The IESC recommends the documentation and reporting of biodiversity-related training going forward.

External action and cross-sector initiatives to reduce threats to avian species

No progress was reported on these BAP actions in the AMR or QMR reports or documentation provided.

10.2.3 Post Construction Survey

Although not reported in the 2019 AMR or 2020 QMR reports, a report has been provided outlining a Biodiversity and Ecosystem Services Assessment for the ORF location by Envaserv Research Consult Ltd (ERC), which included surveys from 22nd to 25th November 2019 and from 19th to 20th January 2020. This study included the quantification, and categorisation of biodiversity and habitats in order to evaluate how the Project impacts could be compensated through No Net Loss (NNL) or Net Gain (NG) depending on the habitat categorisation. The study concluded that offset requirement for high distinctiveness habitat will require 26.60 ha of land to achieve NNL, or 30.59 ha to achieve a NG of 15%.

10.2.4 No Net Loss Strategy for Natural Habitat

No information is provided in the AMR or QMR reports regarding the Wetlands Strategy, however during a call with Eni Ghana on 30th September 2020 it was stated that this was not progressed previously as it was too early to determine the extent of permanent wetland loss. Eni Ghana also clarified that the NNL Strategy has now evolved to cover all Natural Habitat, as not all of this is wetland. Now that the post-construction survey has taken place (see Section 10.2.3 above) the loss is better understood. This has led to the development of an initial strategy of achieving NNL through on-site habitat restoration, and additionally, if on-site restoration actions are not sufficient, Eni Ghana has identified, on a preliminary basis, three sites in the wider Amansuri region which are potentially suitable for either off-site averted loss or restoration offsets (pending further investigation). It is understood that the draft NNL Strategy is currently under review by WBG.

10.2.5 Vegetation Reinstatement

The 2019 AMR reports that the plant nursery at the ORF was managed effectively to have an ample supply of the required indigenous saplings for ongoing revegetation works and states that revegetation management will remain an ongoing activity. Such statements are supported by the IESC's earlier visits to the nurseries, as outlined in earlier IESC monitoring reports. Restoration work was reported to be complete for the Takoradi - Tema interconnection project.

The Q1 2020 QMR reports that revegetation activities by ESL Consulting continued in January and February but were put on hold in March due to the COVID-19 outbreak; however, nursery management remains ongoing with strict compliance with COVID-19 protocols. The Q2 2020 QMR reports that revegetation of disturbed areas remained on hold due to COVID-19 during Q2. It is understood by the IESC that revegetation works for the CONSAR laydown area was conducted in Q3 2020.

Eni Ghana has indicated that it will conduct quarterly monitoring of flora including alien invasive species, to comply with the requirement in the Production Phase Biodiversity Management Plan (BMP) to conduct regular surveys to verify the status and implementation of the vegetation recovery process. The Revegetation and Alien Invasive Species report provides only limited information for the 2019 and Q1 2020 period; instead it focuses upon the Q2 2020 monitoring which was postponed until September 2020 due to the COVID-19 pandemic. The data provided for the reporting period (2019 and up to end 2020) are limited to summary monthly girth and height graphs for ten representative nursery transplants in the ORF revegetation plots. These graphs generally indicate that the transplanted seedlings are establishing well and growing as expected.

10.2.6 The post-construction report conducted by ERC (Section 10.2.3) included sample points at two restoration sites and it is noted that revegetation with keystone indigenous species was underway accompanied by promising colonisation by naturally dispersed species. Marine Monitoring

The 2019 AMR and 2020 QMRs report that no fish catch or plankton surveys were conducted during the reporting periods and no information has been provided on offshore monitoring for marine mammals or sea turtles at sea.

Regarding fish catch surveys, Eni Ghana clarified that the only fish landing survey conducted was undertaken in 2017 as part of the Fisheries Disturbance Allowance Implementation Plan, in order to provide a basis for the disbursement of a Fisheries disturbance allowance to affected fishers during construction of the Gas Export Sealine. Ongoing monitoring is therefore not taking place.

The Fisheries Management and Participatory Monitoring Programme Framework Strategy, which outlined the pre-construction fish catch monitoring approach, indicated that the fish catch monitoring program would 'continue through construction and into operation in order to understand how fish habitats are re-established and whether there are any longer-term impacts' and indicated that further detail would be given in the Fisheries Management Plan (FMP). The Production Phase FMP does not, however, include any monitoring requirements in this regard, which may be appropriate in light of the information in the 2019 AMR on diminishing fish catches that are considered by fishermen to be a result of hydrocarbon activity.

As discussed in Section 7.7, it is understood that Eni Ghana intends to commission a further offshore monitoring campaign during the first half of 2021. The scope of this future campaign is not known at the time of writing and it is therefore recommended that the scope be further considered during the next site visit. any potential fish catch surveys as this may provide useful contextual information.

OFFSHORE CAPE THREE POINTS

The Marine Mammal and Sea Turtle Protection Policy and Plan (MMSTPPP), as referenced in the Production Phase BMP, contains management measures relating to sightings and incident reporting for marine mammals and sea turtles from supply vessels. The 2019 AMR and 2020 QMRs do not currently include reporting against these measures. The IESC appreciates not all information is captured in the template AMRs and Eni Ghana has clarified that incidental sightings were made, and that reporting of sightings and incidents will continue into 2021.

11. PERFORMANCE STANDARD 8: CULTURAL HERITAGE

11.1 Status update for previously identified issues

There are no issues presented in the IESC's May 2019 site visit report.

11.2 New PS8 findings in Q2, 2020

No new findings are reported following review of the AMR and the Q1 and Q2 QMRs 2020.

APPENDIX 1 ENVIRONMENTAL AND SOCIAL ACTION PLAN

Updated ESAP - 01 February 2018 to replace the version updated 16 June 2017.

	Task	Indicator of Completion	Timeframe
1	Eni Ghana with support from Vitol will develop a construction/ development phase Environmental, Social, Health Management Plan (ESHMP) and the relevant management plans and programs in advance of development drilling and construction, followed by a production/operations ESHMP which will be developed before first oil, with gas-related elements integrated as needed before first gas. The ESHMP will be updated as required, such as in the event of any significant changes to the project and its environmental and social risks and impacts occur, following a Management of Change process. The ESHMP will include social management plans and procedures to meet the objectives of the Performance Standards, and those plans and procedures will be incorporated into an integrated Environmental and Social (E&S) Management System for the OCTP project.	Plans and procedures submitted to WBG: a) Development drilling and construction phase: ESHMP, Procurement Plan, Grievance Mechanism, Waste Management Plan, Security Management (Offshore) Strategy by November 15, 2015 b) Recruitment, Employment and Training Plan, Local Content Development Plan, Workers Development Plan, Marine Traffic Management Strategy, Commitment Register by end of November 2015 c) Development drilling and construction phase: all management plans (others than the plans specified in the action items below) approved by end of December 2016 d) Phase-1 commissioning and production operations: by end of August 2017 or one month prior to commissioning / production operations whichever comes first e) Phase-2 commissioning and production operations: by end of July 2018 or one month prior to commissioning / production operations whichever comes first.	a) 11/15/2015 – Complete b) 11/30/2015 - Complete c) 12/31/2016 - Complete d) 08/31/2017 or one month prior to commissioning / production operations whichever comes first - Complete e) 07/31/2018 or one month prior to commissioning / production operations whichever comes first
2	Eni Ghana will require that contractors adopt measures and bridging documents to ensure that their management systems are compatible with HSE Policy, guidelines and procedures and the project ESHMP.	Evidences (i.e., approved bridging documents) collected and submitted to WBG.	12/31/2015 – Complete and ongoing
3	Eni Ghana will implement well integrity and control strategies and develop specific Well Control Emergency Response Plans for each well drilled. All drilling programs will be approved by eni headquarters (that will act as independent, expert third party in charge of verification/review).	a) WCEMP applicable to the first three wells drilled approved by eni headquarters and submitted to WBG by September 2015, and evidences of implementation of the third party verification/review of the drilling programs by October 15, 2015 b) Auditable evidences of implementation provided to WBG in the Annual Monitoring Report.	a) 10/15/2015 – Complete b) 12/31/2017
4	Eni Ghana will develop the specific E&S monitoring plans. A number of pre-construction surveys will be implemented, including: (i) preconstruction fish catch surveys at Sanzule and in the project area of influence, with specific focus on beach seine fishing activities; (ii) phyto- and zooplankton surveys (near the same time as the catch surveys and focusing on fishing grounds); (iii) ambient air quality and noise monitoring in the area of influence of the ORF; (iv) preconstruction survey of sensitive avian species that may be present, particularly during the boreal winter.	a) Terms of reference of the time sensitive surveys (birds and sea turtles) submitted to WBG by end of October 2015 b) Pre-construction surveys and monitoring plans submitted to WBG.	a) 10/31/2015 - Complete b) 06/30/2016 - Complete
5	Eni Ghana will report on their best efforts to engage other developers, local institutions and government, and other stakeholders in designing coherent management strategies to mitigate cumulative impacts.	a) Cumulative impact mitigation strategy submitted to WBG b) Evidences of implementation provided to WBG as part of the Annual Monitoring Report	a) 11/30/2015 - Complete b) 12/31/2016 - Complete

	Task	Indicator of Completion	Timeframe
6	Eni Ghana will update and refine the air emission dispersion and noise propagation modeling during production facility final design to inform the identification and development of a package of air emission reduction measures.	Modeling updated and submitted to WBG during production facility final design and by anticipated completion date.	10/31/2017 – Complete
7	Eni Ghana will develop and enforce a policy and relevant procedures to ensure that operations of drillship, support vessels and helicopters minimize disturbance to marine mammals and turtles.	Policy and procedures submitted to WBG.	12/31/2015 – Complete
8	Eni Ghana will maintain a quantification program for GHG emissions, according to an internationally recognized emissions estimation methodology, and will establish annual review programs to identify areas of improvement and GHG emission reduction. Eni Ghana has committed to implement a Zero-Permanent Flaring policy, and will implement measures for minimization of venting and flaring (consistent with the Global Gas Flaring and Venting Reduction Voluntary Standard) and minimization of fugitive emissions.	a) Quantification and minimization program for GHG emissions submitted to WBG b) First annual report by anticipated completion date.	a) 10/31/2017 – Complete b) 12/31/2017 – presented to WBG (complete)
9	Eni Ghana will include an environmental lead as part of the oil spill response team and will develop a clear mechanism of escalation of response effort based on coastal and biodiversity sensitivity. Mutual aid agreements with other operators in Ghana will be established.	Evidences of implementation (i.e., approved revised OSCP) submitted to WBG.	12/31/2015 - Complete
10	Eni Ghana with the support of Vitol will develop and implement a Livelihood Restoration Plan (LRP) for affected people in the community of Sanzule. Once all mitigation measures have been substantially completed and displaced persons are deemed to have been provided adequate opportunity and assistance to sustainably restore their livelihoods, eni Ghana will undertake a completion audit comparing outcomes against objectives of the plan and current living conditions against living conditions prior to the start of the project. eni Ghana will develop a Land Acquisition and Compensation Framework for any potential additional land acquisitions that may be required for the project or future expansions.	a) LRP workshop held b) Draft final LRP submitted to WBG c) Final LRP submitted to WBG d) Update report by Eni Ghana/Vitol on actions taken (e.g., financial training, food aid, education and health support, stakeholder engagement, feasibility studies by the 4 NGOs). The report will also summarize implementation issues faced in 2016-2017 and lessons learned. e) Evidences of implementation included in the periodic E&S progress reports and Annual Monitoring Report f) Interim Implementation Audit carried out by an external competent resettlement professional and report submitted to WBG g) Finalization report by implementing organization submitted to WBG and Completion Implementation audit carried out by an external competent resettlement professional and report submitted to WBG	a) 10/31/2015 – Complete b) 11/30/2015 - Complete c) 12/31/2015 or six weeks prior to construction early works whichever comes first - Complete d) 02/28/2018 - Complete e) Based on LRP – Ongoing f) 03/31/2019) – Completed (post Q2, 2019) g) Finalization report: at the completion of the LRP Completion audit: One year after the completion of the implementation of the LRP - can only be closed after LRP implementation period has ceased.
11	Eni Ghana with the support of Vitol will develop a Fisheries Management Plan (FMP) to ensure fishermen are compensated appropriately and assistance for improving or at least restoring their living conditions is provided. The FMP will be monitored throughout its implementation to its completion. A participatory monitoring program will be developed with the involvement of local fishermen. The plan	a) FMP strategy submitted to WBG. b) FMP submitted to WBG.	a) 12/31/2016 Complete b) 5/31/2017 or 2 months prior to construction sea pipeline whichever comes first - Complete

	Task	Indicator of Completion	Timeframe
	will also include a compensation framework in line with PS 5 in case fishers are adversely impacted by an oil spill.	c) Evidences of implementation of the FMP and participatory monitoring program included in the Annual Monitoring Report.	c) 12/31/2017
12	Eni Ghana with the support of Vitol will develop a Biodiversity Management Plan (BMP and relevant Biodiversity Action Plans) and will implement it, in collaboration with recognized species specialists. Seasonal constraints, associated with peak turtle nesting season between October and February and with dwelling season of the IBA triggering species, will be incorporated in the construction and operation management plans.	a) BMP submitted to WBG, including identification of opportunities to enhance conservation of priority bird species (including specific focus on the hood vulture) and/or habitat in the project area b) BAPs for sea turtles and for birds submitted to WBG c) Evidences of implementation of the BMP / BAPs included in the Annual Monitoring Report.	a) 07/31/2016 – Complete b) 11/30/2016 - Complete c) 12/31/2017 - Ongoing
13	Eni Ghana will ensure that support helicopters will routinely avoid flying over the sensitive areas of 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.	Evidences of avoidance (i.e., helicopter flight plans and relevant language on flights associated with emergency/oil spill response drills in the revised BMP - see Action Item 12) provided to WBG.	05/31/2016 - Complete
14	Eni Ghana and Vitol Ghana, as partner of the OCTP project, will develop and implement a community investment strategy for the area of influence of the project by identifying areas of potential social investment based on community assets and needs. The community investment strategy will be developed in consultation with local and regional stakeholders.	a) Community investment strategy submitted to WBG b) Final Community Investment Strategy submitted to WBG c) Updates and evidences of implementation of the strategy included in the Monthly E&S Reports and Annual Monitoring Report.	a) 12/31/2015 – Complete b) 10/31/2017 - Complete c) 12/31/2018 – Complete and on going
15	Eni Ghana and Vitol Ghana, as partner of the OCTP project, will hire an independent E&S consultant (IESC) to monitor and report on implementation of this E&S Action Plan and compliance with Performance Standards and E&S commitments. The monitoring visits will be carried out biannually (every six months) during development drilling and annually during production operations. The reports of the IESC will be published.	a) IESC's Terms of Reference submitted and approved by the WBG, and IESC hired b) First monitoring visit and report submitted.	a) 12/31/2016 - Complete b) 03/31/2017 - Complete
16	Vitol Ghana will assign an E&S assurance manager to the OCTP project to oversee environmental, health, safety and social aspects, ensuring compliance with Performance Standards and project E&S commitments.	E&S assurance manager appointed.	10/31/2015 – Complete
17	Vitol Ghana will develop and adopt a Human Resource Policy.	Human Resource Policy submitted to WBG.	12/31/2015 – Complete
18	Vitol Ghana will update its security policy to be aligned with the Voluntary Principles on Security and Human Rights.	Policy submitted to WBG.	12/31/2015 – Complete

APPENDIX 2

STATUS OF 'OPEN' ISSUES (END Q2, 2020)

This Appendix includes two tables. First, Table A1 presents a summary of new issues identified within this report. The second, Table A2 presents issues identified during previous site visits/desk-top reviews. Within the ID column, an issue is identified by a composite reference number combining the issue number and year (for example, '001_5/19' which refers to the first issue in the May 2019 report).

Table A1. Summary of issues identified within this report for the reporting period July 2019 through to June 2020

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/Superseded (IESC Opinion)
001_11/20	Annual reporting/AMR content	Stricter adherence to the AMR/QMR templates is required as well as additional commentary in certain sections.	Production phase	The IESC also recommends a review of the reporting templates content, noting the changed nature of the Project and a shift in priority areas following the full transition away from construction and drilling activities.	Moderate	Open
002_11/20	SEQ/SLC resources	Several positions are vacant within the Safety, Environment and Quality team, including the HSE Operations Coordinator. The vacant HSE Operations Coordinator post is a result of a recent departure and a replacement is expected by earlier 2021.	Production phase	The WBG and the IESC should be informed of any interim measures in place whilst the posts are vacant in addition to actions being undertaken to fill the posts.	Low	Open
003_11/20	Cumulative impacts	Agreement on the certain aspects of the design of a Cumulative Impact Co-management Platform has yet to be reached by third parties on the Steering Committee. This is affecting Eni Ghana's ability to engage with the co management platform and	Production phase	Eni Ghana to remain committed to the management of cumulative impacts in cooperation with public and private entities comprising the platform.	NA	Open

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
		thus contribute to the management of cumulative impacts		IESC recognises Eni Ghana’s reliance on external parties and the need for such parties to reach agreement.		
004_11/20	ESAP deliverables	Certain plans are still to be finalised, including revision/development of the following plans: the updated Avian Biodiversity Action Plan; the updated Sea Turtle Biodiversity Action Plan; and the No Net Loss Strategy. Consequently, the IESC considers item 1e) of the ESAP to remain ‘open’.	Production phase	IESC understands plans are progressing and are close to finalisation. This item is expected to be closed in the near future. No further recommendations necessary.	Low	Open
005_11/20	Surface water quality	Closer attention should be given to the information requested in the AMR reporting template, noting that data provided to the Environmental Protection Agency (EPA) is requested and therefore should be included in future AMRs.	Production phase	Data presented to the EPA should also be provided to the IESC for review.	Low	Open
006_11/20	Community grievances	LRP-related documents embedded in the 2019 AMR and the Q1 and Q2 QMRs 2020 provide information on the grievances managed by Eni Ghana and those managed by TechnoServe (TNS), the LRP Support Services implementing partner. Previously, data on grievances managed by TNS (restricted to LRP-	Production phase	All grievances received by the Project (either by Eni Ghana or any of its contractors) - whether escalated by contractors or not – should be recorded in the same manner as grievances received by Eni Ghana are recorded currently.	Low	Open

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
		related grievances) were not supplied in AMRs/QMRs,				
007_11/20	Community grievances	Four fishery-related grievances appear still to be unresolved and therefore are open (one has been open for a long time – just over 1 year).	Production phase	If an agreement has not been reached on an action to resolve the grievance reached by end 2020, that Eni Ghana proposes to the FMCC that an independent external party be involved to assess the grievance and propose a way forward.	Moderate	Open
008_11/20	Community Investment Strategy: Quick Impact Projects	With respect to the educational project; there have been delays to a) the capacity-building component and b) the infrastructure component has not yet started	Production phase	Recommendations are: a) Lead for Ghana (LfG), the implementing partner for the capacity-building component, updates regularly, its COVID-19 Student Learning Plan in line with new government measures/restrictions to enable the project to minimize adverse educational impacts from COVID-19. Once, all measures/restrictions are removed then Eni Ghana and LfG should evaluate and then agree actions, if necessary, to facilitate a 'catch up' in the shortest possible time period; and b) Eni Ghana work closely with the selected contractor to reduce any delays related to acquiring the requisite permissions for managing	Low	Open

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
				the necessary removal of asbestos during building works.		
009_11/20	Fishery-based incursions into FPSO offshore exclusion Zone	Cumulative totals of incursions for Q3 and Q4 2019 and the totals to date for end June 2020 (with extrapolation for the year 2020) highlight the continuing challenge posed by fishing boat incursions into the FPSO offshore exclusion zone and the need for Eni Ghana to continue its efforts to reduce the number of incursions.	Production phase	Incursion monitoring efforts to be continued and analysis and reporting, in both QMRs and AMRs, to be extended to encompass trends in the number of incursions and seasonal effects as well as presenting cumulative totals for defined time periods. Also, to the extent possible, data on the origin of vessels/ownership entering the FPSO exclusion zone should be analysed and trends reported with the incursion data presented in QMRs and AMRs. In addition, Eni Ghana to continue to seek effective means of reducing incursions and documents their efforts in the QMRs and AMRs.	High	Open
010_11/20	Livelihood Restoration	There are significant challenges facing Eni Ghana's efforts to restore livelihoods, prior to the ending of the LRP Support Services component of LRP implementation, at the end of January 2021.	Production phase	Eni Ghana to reinforce its efforts to assist those PAPs not generating any revenues and, also, consider preparing an LRP Exit Strategy, for ensuring livelihood restoration for PAPs if future monitoring and evaluation results show that the objective of livelihood restoration cannot be achieved by end January 2021	High	Open

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
011_11/20	Air emissions	The IESC has previously reported that emissions are not reported in a manner that allows comparison with WBG emission guidelines. Furthermore, emissions sources reported for the ORF site are the same as for construction and not updated to reflect production phase emissions.	Production phase	Eni Ghana should review major emission sources for the Production Phase, including power generation and compressor system emissions at the ORF, and report these in the format specified in AMR and QMR templates. Eni Ghana should undertake stack emission sampling to confirm limits specified in WBG EHS Guidelines are not exceeded.	Moderate	Open
012_11/20	Frequency of Sea Turtle and Avian Monitoring	AMR and QMR reports have reported the frequency of sea turtle and avifauna monitoring as a single discussion point, leading to ambiguity over the timing of monitoring for each species group.	Production phase	AMR and QMR reports should discuss survey effort for sea turtles and avifauna separately to avoid any confusing relating to which group was the subject of survey in any given period and facilitate the verification that surveys are taking place in accordance with the expected monitoring schedule for each species group	Low	Open
013_11/20	Staff training on biodiversity issues	No documentary evidence on staff training in relation to sea turtles and avifauna for the review period was provided for review	Production phase	Documentation and reporting of biodiversity-related training going forward.	Low	Open

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
014_11/20	Bushmeat survey	Although recording of sea turtle poaching activity is ongoing as part of monitoring, the BAP action to identify active trade routes for bushmeat in the Project area requires progression	Production phase	A bush meat survey to identify any active trade route for sea turtle products should be scheduled going forward	Low	Closed (sea turtle survey undertaken)
015_11/20	Offshore biodiversity monitoring	No information reported on the monitoring of marine mammals, sea turtles at sea and fish to demonstrate compliance with the BMP	Production phase	The scope of the further offshore monitoring campaign planned to commence in first half of 2021 should be confirmed during the next site visit	Low	Open

Table A2. Issues identified prior to the 2019 AMR Q1 and Q2 2020 QMR review

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
001_5/19	Community investment (potable water supply QIP)	Development of more robust management of the potable water supply project	PS1 Construction and Production	Eni Ghana to continue to work closely with the WBC to improve the levy collection/project cash flow and ability of operators to perform their tasks effectively.	Minor	Open (this work is continuing)
002_5/19	TTIP QRA (revised scope)	The potential need to relocate community members living near the Tema RMS cannot be ruled out at this stage. Pending preparation of a new QRA for the revised plant design/operating philosophy.	PS1, PS4 Production	In the event that relocation is required, Eni Ghana's responsibility and ability to influence any future relocation needs to be clarified and agreed between Eni Ghana and the WBG.	Minor (increasing to Moderate if resettlement is required)	Closed (design optimisation and QRA demonstrating a tolerable risk level)
003_5/19	Operational readiness	The ESHMP refers to the Offshore Hydrotest Disposal Plan despite hydrotesting being completed prior to reissue of the ESHMP. Other socio-economic plans referenced in the ESMHP are yet to be updated for the Production phase.	PS1 Production	The Security Management Plan to be agreed with WBG and approved/signed off by Eni Ghana as soon as possible (see also 010_5/19)	Minor	Superseded (see 004_10/20)
004_5/19	T-cards	The T-card system for visitors at the temporary accommodation camp did not accurately reflect visitor presence on site/departure times.	PS1/PS2 Construction and Production	The use of T-cards at the site should be reviewed with consideration of further training for security personnel and provision of additional T-cards to allow for peak visitor numbers.	Minor	Open

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
005_5/19	Environmental monitoring sampling points	In its previous site visit report, the IESC highlighted an ambient air sampling point located upwind of the main emissions sources and therefore likely to be of little use in monitoring any impacts to ambient air quality originating from the Project. The monitoring locations have not been revised/supplemented.	PS1 Production	The location of sampling points for Production phase monitoring should be reviewed and revised as necessary based on operational emission sources, sensitive receptors and zones of maximum impact identified in predictive air quality studies.	Moderate	Closed (a map of sampling locations accompanying the Q2 2020 QMR does indicate a new sampling location)
006_5/19	Monitoring of demobilised workers	Reintegration of workforce	PS2 Production	Eni Ghana to: a) expand the scope of the survey to include livelihood/income status of the demobilised workers and their households as well as their occupations and means of livelihood; and b) re-consider the survey sampling parameters to be used, in the future, in the context of the needs of the potential users of the data	Minor	Open
008_5/19	Waste management	Poor segregation of wastes at source in the PAC construction area	PS3 Construction	Eni Ghana to ensure multiple bins are available for the different types of waste intended for segregation and recycling as per the Waste Management Plan.	Minor	Superseded (IESC unable to revisit site prior to completion of construction at the PAC)
009_5/19	Community water quality	Eni Ghana/ESL has not undertaken water level/drinking	PS3	Eni Ghana should clarify its position with respect to the monitoring of water quality from community water wells and fulfil the	Minor	Open (remains open unless Eni

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
		<p>water quality monitoring from community wells.</p> <p>Eni Ghana indicated that it was not part of ESL's scope to analyse water quality for drinking water parameters, but instead this was the responsibility of the SLC team.</p>	Construction and Production	<p>requirements of the Environmental Monitoring Programme (2018).</p> <p>Eni Ghana have provided contradictory information concerning the use of old drinking water wells. Consequently, it is believed some individuals are still using the old wells.</p>		Ghana can confirm no use of the wells. SLC manages monitoring of water quality for the water supply project)
010_5/19	Project Security SMP	<p>The Project SMP requires substantial revision following the labour unrest in Q1 2018 and, also, in response to the IESC's finding that offshore security provisions have not changed since September 2018.</p> <p>IESC understands that agreement between Eni Ghana and WBG is close with respect to finalising the current draft SMP.</p> <p>Project need for state-sponsored security back-up provision for the operational ORF. Currently, there is only an informal agreement/understanding between Eni Ghana and the local police regarding the role of the police in providing security. Such an agreement/understanding is not sufficient.</p>	PS4 Construction and Production	<p>The Project SMP to be agreed with WBG and approved/signed off as soon as possible.</p> <p>The final SMP needs to include all pertinent international and O&G sector guidance on managing security and be aligned with other Eni Ghana plans that impinge on security-related issues (such as the Production phase Fisheries Management Plan).</p> <p>An MoU to be reached, as soon as possible on the use of State actors (Navy and/or Army) in the protection of offshore and onshore assets and personnel (especially the operational ORF). This MoU should be based, to the extent practical, on international and O&G sector guidance; such as IFC's (2017) Good Practice Handbook entitled '<i>Use of Security Forces: Assessing and Managing Risks and Impacts: Guidance for the Private Sector in Emerging Markets</i>'.</p> <p>An 'agreement' between the Project and the police should be formalized soon, perhaps via an MoU, to remove the uncertainty inherent in an informal 'agreement'.</p>	High	Open (IESC understands the Plan was approved/signed off in mid-November 2020.

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
011_5/19	Project Security Management Plan – fishing vessel incursions	Incursion of fishermen into exclusion zones	PS4 Construction and Production	<p>Efforts to enforce exclusion zones must continue/new initiatives need to be sought. Eni Ghana should continue liaison with other O&G operators in the region (and consider experience from other West African regions and those beyond West Africa to identify effective practices that may be transferable to OCTP).</p> <p>Continue with efforts with Ghanaian authorities, such as GMA and GNPC, to expedite agreement on measures and mechanisms that can improve offshore security in both the short and long-term (recognizing that a sustainable long-term solution/s may not be implemented for several years). These efforts to include concluding an MoU with the Ministry of Defence with respects to the contribution of the Navy to provision of offshore security.</p>	High	Open
012_5/19	Livelihood Restoration (LR) Programme Support Services	At time of food aid termination, about 20% of PAPs had not, "...officially started to generate revenue...".	PS5 Construction and Production	Eni Ghana to maintain a register of each individual PAP, from the estimated 20%, who has generate revenue and record remedial actions taken with date, responsible entity/person, and results, to assist it to track success in restoring livelihood status to these PAPs; with emphasis on vulnerable PAPs.	High	Closed (IESC notes that there is a monitoring and evaluation process in place that gives emphasis to all PAPs - with vulnerable PAPs considered separately)

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
013_5/19	Livelihood Restoration (LR) Programme Support Services	Certain sites selected for LR Programme Support Services options may have caused environmental harm to forested areas/swamps resulting in habitat loss.	PS 5 and PS6 Construction and Production	Eni Ghana (environmental team) and TechnoServe to work together to create a simple E&S screening procedure to guide site selection with allocation of responsibility to senior HSE staff members in terms of making the final decision and then sign off. Supervision of option implementation including a monitoring procedure), for certain cases, up to the point where the option is operational should be part of the appraisal process. The extent of any habitat loss, due to livelihood restoration activities, to be calculated and included in overall Project calculations of net loss of natural habitat.	Moderate	Open (IESC acknowledges that an E&S Appraisal process has been implemented)
014_5/19	Site drainage and erosion control	Eni Ghana, under advice from ESL, has chosen to regenerate swamp (by lowering the ground level) rather than use soft engineering options to reduce erosion and subsequent sedimentation of the swamp.	PS6/PS3 Construction	It is unclear how successful the concept will be. Water levels in swamp areas at the time of the visit were relatively high however were not inundating the area at the point of surface water discharge. This approach needs to be carefully monitored and soft engineering measures implemented if the concept of swamp regeneration fails.	Minor	Open
015_5/19	Reinstatement - Removal of soil	The disposal strategy for the large quantity of waste soil stored behind the Consar laydown is not described in the ORF Reinstatement and Restoration Plan and is therefore unclear.	PS6/PS3 Construction	The quantity of waste soil should be calculated and a clear disposal/reuse strategy prepared. Priority should be given to beneficial reuse.	Minor	Open

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017_5/19	Additional conservation actions	The selection of additional conservation actions has not been made, but is underway, and will be presented in revised Avian and MMST BAPs.	PS6 Operations	The ACAs should complement the requirement for no net loss of wetland habitat and clearly presented in revised versions of the BAPs for WBG review. The original authors of the BAPs should provide input into the revision of BAPs and the ACAs defined therein.	Moderate	Open (IESC aware BAPs have been revised but item remains open until revised BAPs have been reviewed)
018_5/19	Biodiversity: Environmental Monitoring of Wetland Water Levels and Vegetation	The culverts, located close to the GNGC pipeline tie in, that have installed beneath the access road and pipeline to maintain the hydrological connectivity and functioning in the adjacent wetland natural habitats appear to be position above the dry season water level	PS6 Construction and Operation	Water levels in the wetlands <u>either side</u> of the RoW should be monitored over the long-term to check that hydrological connectivity and functionality has been maintained and that changes are not impacting the wetland habitats.	Minor	Open
019_5/19	Biodiversity: No Net Loss of natural habitats	The Identification and Assessment of Potential No Net Loss Options, scheduled to be completed by Q1 2019, has not been initiated	PS6 Construction and Operation	It is recommended that Eni Ghana initiate the prescribed programme as soon as possible and reports the findings of its options study to the WBG.	Moderate	Open (IESC aware that some potential options have now been identified but item remains open until more information is available)
012_09/18	Labour management	Reinforcement of induction training on worker terms and	PS2	Amend the Worker Management Plan to contain a requirement for repeat refresher training on worker terms and conditions of	Minor	Open (The Workers Management

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		conditions of employment and worker rights and responsibilities	Construction and Production	employment and worker rights and responsibilities (as provided to new recruits during induction) and then implement the refresher training according to the schedule set out in the revised Worker Management Plan.		Plan -Production [SUST-Plan-003] includes actions on refresher training. The IESC will seek to close this item after inspection of Eni Ghana’s corrective action log during the next IESC monitoring visit).
025_09/18	Biodiversity: Sea Turtle Biodiversity Action Plan	Security personnel are not completing patrols of the beach in the concession at night during peak nesting period (June–August) as part of their regular circuit.	PS6 Construction and Operation	Eni Ghana to ensure that the all security personnel are trained and motivated to perform these patrols. It would be appropriate for GWS to provide this training. As the security contract for the operational phase is being handed to a new provider (G4S), additional training and motivation is required to implement the security patrols.	Minor	Open (IESC understands that this activity now forms part of ESL’s beach monitoring survey activity and that no enforcement action is possible and this is expected to be clarified in the revised Sea Turtle BAP)

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026_ 09/18	Biodiversity: Sea Turtle Biodiversity Action Plan	It is understood that GWS has submitted a proposal to Eni Ghana for the completion of a community conservation programme and that this is being currently under consideration in Eni Ghana's procurement process	PS6 Construction and Operation	IESC recommends that the GWS proposal is shared with the IESC and Lenders for review and that a timetable for implementation of a community conservation programme is confirmed.	Moderate	Open (consultation re: a potential community conservation programme remains ongoing but will presumably now involve ESL- may be clarified in the finalised Sea Turtle BAP)
027_ 09/18	Biodiversity: Avian Biodiversity Action Plan	The Avian BAP includes the action " <i>Engage and contribute to existing community-based Vulture conservation programme.</i> " It is understood that some engagement sessions were completed in 2017, but that Eni Ghana has no existing plans to progress this action.	PS6 Construction and Operation	It is recommended that Eni Ghana progresses a long-term programme of community-engagement focussing on vulture conservation, possibly targeted to the nearby villages known to hunt vultures.	Moderate	Open (IESC understands Avian BAP has been revised and potentially addresses this issue. IESC will review the revised BAP during the next review phase and update the status accordingly)
033_ 09/18	Biodiversity: No Net Loss of natural habitats	Identification and Assessment of Potential No Net Loss Options is	PS6	It is recommended that Eni Ghana initiate the prescribed programme as soon as possible. This would also potentially reduce the level of	Moderate (becoming High if not	Open (IESC understands

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		scheduled to be completed by Q1 2019.	Construction and Operation	compensation required to offset for the time-lag between habitat losses and the delivery of the offset.	completed according to schedule set out in the management plan.)	that progress is now being made in this regard and expects review the Wetland NNL Strategy during the next review phase)
006_03/18	FPSO walkover	Large quantities of fuel/other hydrocarbon-based products were stored without localised secondary containment.	PS1 Operations	Project should consider localised secondary containment around the stockpile and reducing the number of drums stockpiled on board the FPSO.	Minor	Open (IESC will seek to close this item following review Eni Ghana’s corrective action log during the next site visit).
007_03/18	FPSO walkover	A 200-litre drum containing unknown contents was present. The IESC understands the drum has been on board since the FPSO left Singapore.	PS1 Operations	Efforts are required to identify the contents of the drum. The drum and its contents should be safely disposed in accordance with the approved waste management plan.	Minor	Open (IESC will seek to close this item following review Eni Ghana’s corrective action log during the next site visit).
008 9/17	Human Resources Policy	Eni Ghana does not have a Human Resources Policy that is	Construction and Operations	Prepare, approve, disseminate and implement an Eni Ghana – specific Human Resources Policy. This policy to include explicit	Minor	Open (A policy is still required. It is

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		tailored to its operations in Ghana.	PS2	statements that child and forced labour will not be employed and trafficked persons will not be hired.		recognized that the Recruitment, Employment and Training Plan and Worker Management Plan both cover the issues, mentioned in the column opposite, to varying extents).
009 9/17	Forced labour	The Recruitment, Employment and Training Plan does not contain a clear commitment that forced labour will not be employed.	Construction and Operations PS2	The Recruitment, Employment and Training Plan to be amended to contain a clear commitment that forced labour will not be employed.	Minor	Open (No revised Recruitment, Employment and Training Plan incorporating the required commitment has been prepared).
010 9/17	Accommodation Provision	No Eni Ghana accommodation policy exists.	Construction and Operations PS2	Prepare, approve, disseminate and implement an Accommodation Policy or incorporate it into a (combined) Human Resources and Workers' Accommodation Policy.	Minor	Open

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						(No Accommodation Policy of Human Resources Policy has been prepared. A stand-alone policy or one combined with a Human Resources Policy is still required).
019 9/17	Contractor Management - security	Appendix Q is not always issued to all contractors.	Construction and Operation PS4	Appendix Q to be updated to reflect the approved and 'signed off' Security Management Plan requirements (approval and 'sign off' has not yet occurred) regarding application of the Voluntary Principles for Security and Human Rights to procurement and management of security providers. Once updated and revised Appendix Q to be issued with all ITTs/model contracts to prospective contractors (with a proviso that a contractor can seek Eni Ghana approval that security requirements are not applicable to its operations).	Moderate	Open (As the current draft of the Project Security Management Plan is undergoing Lender review, Appendix Q will need to be updated accordingly when it is finalized).
022 9/17	Influx Management	The potential effectiveness of the Influx Management Plan is threatened by the limited progress to date in establishing the collaborative Multi-	Construction and Operations	Eni Ghana must continue to support WBG efforts to establish a collaborative Multi-Stakeholder Forum.	Moderate	Open

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		Stakeholder Forum for managing cumulative impacts, including coordinated actions to manage influx.	PS5	Establish whether the 'influx management approach' prepared by WRCF, is an appropriate basis for revising the Influx Management Plan by end of Q4 2017.		(The Multi-Stakeholder Forum is not yet established and functioning (See comment for item ID 027_2/17). This element remains OPEN. The recommendation about the influx management approach' is closed.
021 2/17	Contractor Management - security	The extent of the involvement of the Security Manager in the procurement of contractors is limited.	PS 4 Construction and Operation	Ensure that the Security Management Plan will contain minimum requirements to be met by contractors and that these requirements will be factored into procurement processes (and subsequent contractor management) with regards to security provision.	Moderate	Open (Prior to the labour unrest of March 2018, an approved Project Security Management Plan was in place. This approved SMP included the 'minimum requirements'. However, following the labour unrest of

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						<p>March 2018 the SMP requires further updating, revision and approval). Currently, as of end June 2019, this remains an OPEN action.</p> <p>Appendix Q needs to be revised to reflect the final version of this Plan and then the revised Appendix Q needs to be incorporated into all documentation provided to potential contractors.</p>