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OFFSHORE CAPE THREE POINTS ENVIRONMENTAL AND SOCIAL MONITORING REPORT (SEPTEMBER 2022)

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Date **14 February 2023**
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CONTENTS

ACRONYMS AND ABBREVIATIONS

EXECUTIVE SUMMARY

1.	INTRODUCTION	4
2.	SCOPE AND STRUCTURE OF THE REPORT	6
2.1	Scope of the virtual site visit	6
2.2	Project Standards	7
2.3	Structure of the Report	7
2.4	Limitations	8
3.	PROJECT DESCRIPTION	9
3.1	Project description	9
4.	SIGNIFICANCE ASSESSMENT	13
4.1	Review Findings	13
4.2	Assessment of Significance	13
5.	LEGISLATIVE FRAMEWORK AND OTHER PROJECT STANDARDS	15
5.1	Summary of legislative framework	15
5.2	Permitting	15
6.	PERFORMANCE STANDARD 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS	16
6.1	Requirements specified in the ESAP	16
6.2	HSE and SLC responsibilities and resources	16
6.3	Audit programme	16
6.4	Local Development Project - Community Investment Strategy	17
6.5	Cumulative impacts	23
6.6	Influx in the DAoI	24
6.7	Stakeholder engagement	26
6.8	Community grievance mechanism	27
6.9	Emergency Response Planning	29
6.10	Closure of earlier IESC findings	29
7.	PERFORMANCE STANDARD 2: LABOR AND WORKING CONDITIONS	32
7.1	Introduction	32
7.2	Demobilised DAoI workers and re-integration into the local economy	32
7.3	Equal opportunity for women workers and potential for workplace harassment	33
7.4	Contractor management of worker welfare	34
7.5	Worker accommodation	35
7.6	Mental health support	36
7.7	Worker grievance mechanism	37
7.8	Occupational health and safety	37
8.	PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION	44
8.1	Oil sheen	44
8.2	Offshore monitoring campaign	45
8.3	Onshore Monitoring	46
8.4	Air quality	47
8.5	Noise	48
8.6	Greenhouse gas emissions (GHG)	49
9.	PERFORMANCE STANDARD 4: COMMUNITY HEALTH, SAFETY, AND SECURITY	54

9.1	Introduction	54
9.2	Security provision at the ORF and FPSO	54
9.3	Electricity connections to LRP options	55
10.	PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT	58
10.1	Introduction	58
10.2	Site visit to LRP recipients	58
10.3	Meeting with LRP Working Group	59
10.4	Metrics to monitor and evaluate the status of livelihood restoration	59
10.5	Completion audit	61
10.6	Fisheries management	61
11.	PERFORMANCE STANDARD 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES	64
11.1	Introduction	64
11.2	Sea Turtle BAP	65
11.3	Avian BAP	67
11.4	Staff Training	69
11.5	Natural Habitat No Net Loss Implementation Plan (NNLIP)	69
11.6	Vegetation Reinstatement and Alien Invasive Species	70
11.7	Site Drainage and Erosion Control	71
11.8	Marine Monitoring	72
12.	PERFORMANCE STANDARD 8: CULTURAL HERITAGE	76

APPENDICES

Appendix 1

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Appendix 2

PROJECT DOCUMENTATION PROVIDED FOR REVIEW

Appendix 3

MONITORING VISIT ITINERARY

Appendix 4

STATUS OF ISSUES IDENTIFIED IN PREVIOUS MONITORING VISITS

Appendix 5

PHOTOLOG

ACRONYMS AND ABBREVIATIONS

ACA	Additional Conservation Actions
AIS	Alien Invasive Species
AMR	Annual Monitoring Report
ATDU	Anaerobic Thermal Desorption Unit
BAP	Biodiversity Action Plan
BMP	Biodiversity Management Plan
CEMS	Continuous Emissions Monitoring System
CHMP	Cultural Heritage Management Plan
CIS	Community Investment Strategy
CLO	Community Liaison Officer
DAoI	Direct Area of Influence
EC	Energy Commission
E&S	Environmental and Social
E-PTW	Electronic Permit to Work
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESL	ESL Consulting
EHS	Environmental, Health and Safety
EPA	Environmental Protection Agency
ERP	Emergency Response Plan
FFI	Flora and Fauna International
FLO	Fisheries Liaison Officer
FMCC	Fisheries Management Coordination Committee
FPSO	Floating Production Storage and Offloading
GEA	Ghana Enterprise Agency
GES	Gas Export Sealine
GMA	Ghana Maritime Authority
GNGC	Ghana National Gas Company
GNPC	Ghana National Petroleum Corporation
HSE	Health, Safety and Environment
HSE and S	Health, Safety, Environment and Sustainability
IBA	Important Bird and Biodiversity Area
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
IOCs	International Oil Companies
kboe	Kilo barrels of oil equivalent
KPI	Key Performance Indicator
LDPj-CIS	Local Development Project-CIS
LTE	Landfall Terminal End
LRP	Livelihood Restoration Plan
MIGA	Multilateral Investment Guarantee Agency
MMO	Marine Mammal Observer
MoC	Management of Change
MoU	Memorandum of Understanding
MPG	Main Power Generator
MS	Management System
NAG	Non-associated Gas
NNL	No net loss
NNLIP	No Net Loss Implementation Plan
NO ₂	Nitrogen Dioxide

O&G	Oil and Gas
OCTP	Offshore Cape Three Points
ORF	Onshore Receiving Facility
OHS	Occupational Health and Safety
PAC	Project-Affected Community
PAP	Project-Affected Person
PAC	Permanent Accommodation Camp
PC	Petroleum Commission
PHC	Population and Housing Census
PM ₁₀	Particulate matter <10 microns in diameter
PPE	Personal Protective Equipment
PS	Performance Standard
PTW	Permit to Work
QMR	Quarterly Monitoring Report
RoW	Right of way
SEP	Stakeholder Engagement Plan
SHERPA	Safety Health Environment Radiological Protection Data Acquisition
SLC	Sustainability & Local Content
SMP	Security Management Plan
SO ₂	Sulphur Dioxide
TTIP	Takoradi to Tema Interconnector Project
Vitol	Vitol Exploration and Production Limited
Voluntary Principles	Voluntary Principles on Security and Human Rights
VUGL	Vitol Upstream Ghana Limited
VSV	Virtual Site Visit
WB	World Bank
WBC	Water Board Committee (of the potable water supply project)
WBG	World Bank Group
WMP	Waste Management Plan
WRCF	Western Region Coastal Foundation

EXECUTIVE SUMMARY

In September 2022, Ramboll UK Limited, acting in the role of Independent Environmental and Social Consultant (IESC), undertook the seventh in a series of 6-monthly/annual site visits to monitor the environmental and social (E&S) performance of the Offshore Cape Three Points (OCTP) Project, Republic of Ghana (the 'Project'). The Project is operated by Eni Ghana Exploration and Production Ltd (Eni Ghana). Vitol Upstream Ghana Limited (VUGL), an affiliate of Vitol Exploration and Production Limited (Vitol), and Ghana National Petroleum Corporation (GNPC) are JV non-operating partners. The previous site visit had been conducted virtually due to the COVID-19 pandemic, however on this occasion an in-country site visit was possible on the proviso that strict COVID-19 precautions were taken.

The overall role of the IESC is to monitor the Project's management of E&S matters, including the implementation of the Project Environmental and Social Action Plan (ESAP); the adequacy of Health, Safety, Environment and Sustainability Management Systems; and the implementation of a suite of E&S management plans intended to address applicable Project standards, notably the World Bank Group (WBG) Performance Standards¹.

A two-person team from Ramboll participated in the site visit. Representatives from IFC and VUGL also joined the site visit as observers. The Ramboll team was supported by a biodiversity specialist based in the UK who joined meetings remotely. Topic specific meetings were conducted with the Eni Ghana HSE and the Sustainability and Local Content (SLC) teams and their supporting consultants throughout the site visit (see site visit itinerary, Appendix 3). Given the follow-up nature of the site visit, and the first on site visit in almost 3 years because of Covid travel restrictions, the primary objectives were to:

1. Confirm closure of the issues identified during previous visits/desk-top reviews;
2. Address any issues identified following review of the Project's 2021 Annual Monitoring Report and Quarterly Monitoring Report prepared at the time of the visit (Q1 and Q2 of 2022);
3. Conduct a physical walkover of the Onshore Receiving Facility (ORF) including the Gas Export Sealine (GES) shore crossing;
4. Interview Eni Ghana's environmental/biodiversity monitoring consultants;
5. Monitor the ongoing implementation of Eni Ghana's E&S management plans including biodiversity plans, such as its Turtle and Avian Biodiversity Action Plans (BAPs);
6. Confirm adequacy of accommodation facilities (under contraction when the IESC was last in-country);
7. Confirm status of Security Management Plan and its implementation;
8. Discuss recent progress, status and future work with respect to:
 - a. The water supply and education projects implemented under the 'Quick Impact Projects' (QIP) component of the (then) Community Investment Strategy; and
 - b. Other projects recently initiated/about to be initiated under the LDPj-CIS initiative²;
9. Discuss recent progress, status and future work with respect to:
 - a. The Livelihood Restoration 'Support Services';
 - b. Livelihood Restoration: monitoring and evaluation; and
 - c. Fisheries management.

¹ WBG Performance Standards refer to IFC (January 2012), WB (July 2012) and MIGA (October 2013) Performance Standards

² In October 2019, Eni Ghana issued a Management of Change Notification concerning a decision to extend the life of the Community Investment Strategy (CIS) by 1 year. In this Notification the CIS is referred to as the Local Development Project-CIS (LDPj-CIS). The term 'LDPj-CIS' is used in this report to refer to the extended CIS.

10. Discuss implementation of the Stakeholder Engagement Plan and the current situation regarding both community and workers' grievances;
11. Gather feedback on labour and working conditions through two group interviews with workers from two contractors working at the ORF;
12. Discuss the ongoing influx monitoring;
13. Assess status of efforts to manage cumulative impacts;
14. Revisit compliance with the ESAP (version updated February 2018); and
15. Identify any upcoming activities for further attention in future monitoring efforts.

Regarding the first and second objectives, the IESC found that Eni Ghana had made good progress with the closure of the actions reported following the previous IESC monitoring trips. The IESC found that the Project to be compliant with the requirements of the ESAP, and that HSE and social matters are well managed. Nevertheless, 32 findings were identified during the site visit. Of these, zero findings are of 'High' significance and 8 are of 'Moderate' significance with the remainder being of 'Minor' significance. Below, the findings of 'Moderate' significance are presented along with recommendations.

The findings categorised as 'moderate' relate to:

1. *Cumulative impacts.* Following inauguration of the multi stakeholder cumulative impacts co-management platform, priority actions appear to focus solely on fisheries management. Furthermore, disagreements over funding mechanisms persist. Eni Ghana should use its best efforts to influence the Terms of Reference for the Technical Committee such that it includes consideration of biodiversity issues that align with commitments (ACAs) in the Avian and Sea Turtle BAPs. To the extent feasible, Eni Ghana should also seek to resolve the disagreement over funding mechanisms.
2. *Worker grievance mechanism.* IESC notes that with COVID-19 restrictions at the ORF and with the offshore nature of the FPSO, there may be no or limited opportunity for local contractor workers to have in-person contact with the CLOs while working at these sites on rotation. Given the length of rotations (i.e. 28 days) this leaves a long period of time in which local contractor workers may not have an opportunity to raise grievances in-person to a CLO. Eni Ghana should review the methods through which local contractor workers can raise grievances directly to Eni Ghana, and specifically if they are not achieving resolution through their employer or if they have concern about confidentiality and retribution. This review should ensure that there are methods available for contractor workers at the ORF, FPSO and other work sites to raise grievances in writing and verbally, including with options to do so anonymously.
3. *Contractor management of worker welfare.* The IESC undertook two group interviews with workers from two contractors working at the ORF and some issues of labour and working conditions were raised. The issues raised by the workers may be indicative of a grievance mechanism that is not adequately capturing and remedying grievances from contractor workers and may also be indicative of gaps in the monitoring of contractor worker welfare issues by Eni Ghana. Eni Ghana to conduct a review of the reported issues amongst contractor workers and define corrective actions as required. The identification of corrective actions should consider the potential need for changes in worker welfare monitoring, potentially to include increased discussions with contractor workers by Eni Ghana on a regular basis in addition to audits conducted on contractor performance.
4. *Contractor audits.* IESC was provided with a copy of a contractor audit performed by Eni Ghana in 2021. This audit report showed that labour and working conditions are included within the scope of the audit, but the approach is limited to interviews with contractor representatives and does not involve direct discussions with workers to identify any

issues of concern. Such worker discussions may have been limited since 2020 due to COVID-19 control protocols. Changes in these protocols would allow such discussions to take place as part of future contractor audits. Confidential discussions with a sample of contractor workers should be used as part of contractor audits to check for non-compliances with labour and working condition requirements.

5. *Oil sheen.* A number of oil sheen events originating from leaks at the OP7 Xmas tree have been detected since mid-2021. Temporary corrective actions have been used to stop ongoing leaks but a longer-term permanent solution, likely involving the replacement of the OP7 Xmas tree, is required. The following actions should be taken by Eni Ghana:
 - continue to closely monitor for oil releases.
 - develop a road map/action plan for the permanent solution and report progress against the action plan to WBG and the IESC via existing communication mechanisms e.g. monthly operations reports and QMRs.
 - Criteria for shutting down the well should be predetermined to avoid a prolonged decision-making process in the event of future release/increased severity.
6. *Onshore security management at ORF – military police.* An informal arrangement exists with respect to the mobilisation of the detachment of military police based in the vicinity of the ORF. Eni Ghana should continue to implement its best endeavours to reach a formal agreement with the military police outlining rules of engagement, roles and responsibilities in case of mobilisation. The MoU agreed with the Navy serves as a precedent and could be used as a template for any further MoU with the military police.
7. *Analysis of livelihood restoration status.* IESC has identified potential issues with the analysis used to incorporate proxy metrics in the determination of whether livelihoods have been adequately restored. Eni should consider the issues raised by IESC on the use of proxy metric data, weighting and thresholds, in determining whether livelihoods have been restored. Where necessary, revise the method and develop a short report that describes the method that is applied and clarifies how this data and analysis will be used in any future endline reporting and the completion audit. This will need to be fully resolved in time for further endline reporting and the completion audit.
8. *Communication between biodiversity and social teams and impact assessment of the beach road upgrade on sea turtle nesting habitat.* Hard core has been applied to upgrade the beach road at Bakanta. It is understood from ESL's turtle expert that this area was potential nesting habitat for turtles and that the biodiversity team was not made aware of plans to upgrade the road. Better communication between the biodiversity and social teams is therefore required, for example through regular meetings between the functions so that each is aware of the other's planned activities. This communication would flag any potential conflicts and mutually beneficial activities at an early stage without undermining the independent efforts of each function. It is also recommended because community engagement activities are a significant aspect of the Biodiversity Action Plans and No Net Loss Implementation Plan. Related to this, Eni Ghana should undertake an impact assessment to confirm the magnitude of any incremental impacts on nesting sea turtles following the road upgrade. Should likely significant impacts be identified, there will also be a need to provide suitable mitigation/ compensation.

The findings presented in this report should be incorporated within Eni Ghana's audit findings and action tracking/closure process, with evidence of corrective actions provided via the Lenders' quarterly reporting process.

Offshore Cape Three Points

1. INTRODUCTION

Ramboll UK Limited (Ramboll) was commissioned in January 2017 by Vitol Upstream Ghana Limited ("VUGL" or "Vitol") to undertake environmental and social monitoring (E&S) 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, 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 Corporation³ (IFC), World Bank⁴ (International Development Association) and the Multilateral Investment Guarantee Agency⁵ (MIGA) which are all members of the World Bank Group (WBG).

This report provides the findings following the seventh of a series of independent monitoring visits in which the Project is assessed against agreed E&S management plans which in turn were developed to meet the applicable Project Standards, including the WBG Performance Standards and applicable WBG Environmental, Health and Safety (EHS) guidelines.

A two-person team from Ramboll participated in the site visit. Representatives from IFC and VUGL also joined the site visit as observers. The in-country Ramboll team was supported by a biodiversity specialist based on the UK who joined meetings remotely. Topic specific meetings were conducted with the Eni Ghana HSE team, the Sustainability and Local Content (SLC) team and supporting consultants throughout the site visit (see site visit itinerary, Appendix 3). Given the follow-up nature of the site visit, and that it was the first on site visit in almost 3 years due to Covid travel restrictions, the primary objectives were to:

1. Confirm closure of the issues identified during previous visits/desk-top reviews;
2. Address any issues identified following review of the Project's 2021 Annual Monitoring Report and Quarterly Monitoring Report prepared at the time of the visit (Q1 and Q2, 2022);
3. Conduct a physical walkover of the Onshore Receiving Facility (ORF) including the Gas Export Sealine (GES) shore crossing;
4. Interview Eni Ghana's environmental/biodiversity monitoring consultants;
5. Monitor the ongoing implementation of Eni Ghana's E&S management plans including biodiversity plans, such as its Turtle and Avian Biodiversity Action Plans (BAPs);
6. Confirm adequacy of accommodation facilities (under contraction when the IESC was last in-country);
7. Confirm status of Security Management Plan and its implementation;
8. Discuss recent progress, status and future work with respect to:
 - a. The water supply and education projects implemented under the 'Quick Impact Projects' (QIP) component of the (then) Community Investment Strategy; and
 - b. Other projects recently initiated/about to be initiated under the LDPj-CIS initiative⁶;

³ Lender to VUGL debt financing package

⁴ Guarantor to support the gas development

⁵ Insurer for the lenders to VUGL, including Equator Principles Banks and Export Credit Agencies.

⁶ In October 2019, Eni Ghana issued a Management of Change Notification concerning a decision to extend the life of the Community Investment Strategy (CIS) by 1 year. In this Notification the CIS is referred to as the Local Development Project-CIS (LDPj-CIS). The term 'LDPj-CIS' is used in this report to refer to the extended CIS.

Offshore Cape Three Points

9. Discuss recent progress, status and future work with respect to:
 - a. The Livelihood Restoration 'Support Services';
 - b. Livelihood Restoration: monitoring and evaluation; and
 - c. Fisheries management.
10. Discuss implementation of the Stakeholder Engagement Plan and the current situation regarding both community and workers' grievances;
11. Gather feedback on labour and working conditions through two group interviews with workers from two contractors working at the ORF
12. Discuss the ongoing influx monitoring;
13. Assess status of efforts to manage cumulative impacts;
14. Revisit compliance with the ESAP (version updated February 2018); and
15. Identify any upcoming activities for further attention in future monitoring effort.

Face-to-face interviews were held primarily with Eni Ghana's:

- Health, Safety and Environment (HSE) Team;
- Sustainability and Local Content (SLC) Team;
- Community and fisheries liaison officers
- Security Manager; and
- Biodiversity experts from Eni HQ, Milan

Further face-to-face interviews/meetings were held with representatives of the following Eni Ghana consultants, including:

- ESL Consulting; and
- TechnoServe.

VUGL's Asset Manager was present during the site visit and available to answer any questions raised by the IESC. Also, representatives from the World Bank Group (IFC) joined the monitoring visit as observers. Eni Ghana and Vitol made available all personnel requested by the IESC and fully cooperated with all requests made by the IESC throughout the visit.

2. SCOPE AND STRUCTURE OF THE REPORT

2.1 Scope of the virtual site visit

As a condition of the Project ESAP (Appendix 1), Eni Ghana and VUGL are required to appoint an IESC to monitor and report on the implementation of the ESAP and compliance with WBG Performance Standards and Project E&S commitments.

This E&S Monitoring Report details the Project's compliance with the applicable Project Standards listed in Section 2.2, and in doing so, presents the E&S risks associated with the Project. It has been prepared for the attention of VUGL, the IFC and other entities defined as relying parties⁷. It addresses the various components of the Project (as defined briefly in Section 3, Project Description).

The report presents the findings of the September 2022 site visit based on information gained following: interviews with Eni Ghana personnel and consultants supporting with Eni Ghana's management of E&S issues and review of documentation made available prior to and during the site visit. A full list of Project documentation reviewed during preparation of this E&S Monitoring Report is provided in Appendix 2.

The site was undertaken during the period 16th September to 22nd September 2022. The team spent 2 days at the ORF following confirmation that they were COVID free prior to going on site⁸. The tasks performed are summarised below and detailed in the site visit itinerary (Appendix 3): Meetings and interviews, primarily concerned the management and monitoring of the following Project Health, Safety, Environment (HSE) and Sustainability and Local Content (SLC) aspects, were held:

- Project status (closure of all construction-related issues);
- HSE and SLC resourcing;
- Audit and inspection programmes (HSE and SLC);
- Permitting;
- COVID-19 protocols;
- Management of change (MoC);
- Environmental monitoring (onshore and offshore);
- Greenhouse gas emissions monitoring and reporting;
- Waste management;
- Emergency response;
- Extension of the 'Support Services' component of LRP implementation;
- Monitoring and evaluation work to determine livelihood restoration status of 205 households;
- Influx management;
- Management of cumulative impacts;
- Community Investment Strategy implementation (including status and progress for the water supply and education improvement projects);
- Stakeholder engagement/Grievance Mechanism;
- Occupational Health and Safety (OHS) plans and procedures;
- Security management (offshore – FPSO, and onshore - ORF); and

⁷ Relying parties include Eni Ghana and the World Bank, MIGA, and other lenders.

⁸ Team was required to take a PCR test and then isolate whilst awaiting the result before entering the ORF.

Offshore Cape Three Points

- Status of ESAP requirements.

Open findings from site visits/desk top studies were also revisited and closed where possible.

2.2 Project Standards

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

Applicable laws and regulations of Ghana;

WBG Performance Standards (2012):

1. PS1: Assessment and Management of Environmental and Social Risks and Impacts;
2. PS2: Labour and Working Conditions;
3. PS3: Resource Efficiency and Pollution Prevention;
4. PS4: Community Health, Safety, and Security;
5. PS5: Land Acquisition and Involuntary Resettlement; and
6. PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;

WBG Environmental Health & Safety (EHS) Guidelines applicable to the Project including:

1. EHS General Guidelines (2007);
2. EHS Guidelines for Offshore Oil and Gas Development (2015); and
3. EHS Guidelines for Onshore Oil and Gas Development (2007).

PS7 (Indigenous Peoples) was excluded from the scope of the independent monitoring on the basis that the E&S Due Diligence⁹ 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 some text is included in IESC monitoring reports as appropriate, and specifically within this monitoring report an update on protection of the Royal Cemetery is provided.

2.3 Structure of the Report

Section 3 below describes the status of production activities at the time of the visit. Section 4 describes how different levels of significance are attributed to issues highlighted in the report, and Section 5 outlines the Ghanaian legislative framework and other applicable Project Standards. The report is then structured around the seven IFC Performance Standards that are applicable to the Project. The key issues identified during the monitoring visit are summarised in 'significance tables' for each Performance Standard. The status of residual open issues from previous monitoring reports is provided in Appendix 4; these are closed where possible based on discussion and findings made during the site visit.

The report has endeavoured to provide a balanced opinion, providing examples of good practice. However, being a compliance report covering a broad range of aspects, it does focus mostly on observations and non-compliances.

The IESC has not duplicated all information provided in previous reports. Thus, to obtain background information/context in relation to this report, it should be read in conjunction with previous IESC reports listed in the Table 2-1.

⁹ 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 formed the basis of the final agreed ESAP included in Appendix 1 of this report.

Offshore Cape Three Points**Table 2-1: 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 (May 2021) – 2021 AMR, Q1 and Q2 2020 QMR	Desk-top virtual site visit (due to COVID)	July 2020 to May 2021	August 2021
Offshore Cape Three Points Environmental and Social Monitoring Report – 2019 AMR, Q1 2020 QMR and Q2 2020 QMR	Desk-top virtual site visit (due to COVID)	1 st July 2019 to 30 th June 2020	December 2020
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

2.4 Limitations

None.

Offshore Cape Three Points

3. PROJECT DESCRIPTION

This section is intended to provide a brief description of the Project and the status of construction/production activities at the time of the site visit. It also highlights any material design changes that might result in HSE and S impacts.

3.1 Project description

The Project, as described in the Phase 1 and Phase 2 ESIA Reports, involved 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 3-1). Eni Ghana has developed these fields as an integrated oil and gas development Project utilising a newly converted double-hulled FPSO facility. 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 63km subsea gas pipeline from the FPSO to shore;
- A 1.5 km onshore gas pipeline from the shore to the ORF;
- The ORF (Figure 3-2), 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 a FPSO unit that would be 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 unit, a 63km subsea gas pipeline (known as the gas export sealine or GES), the ORF, and tie-in with the GNGC sales gas pipeline.

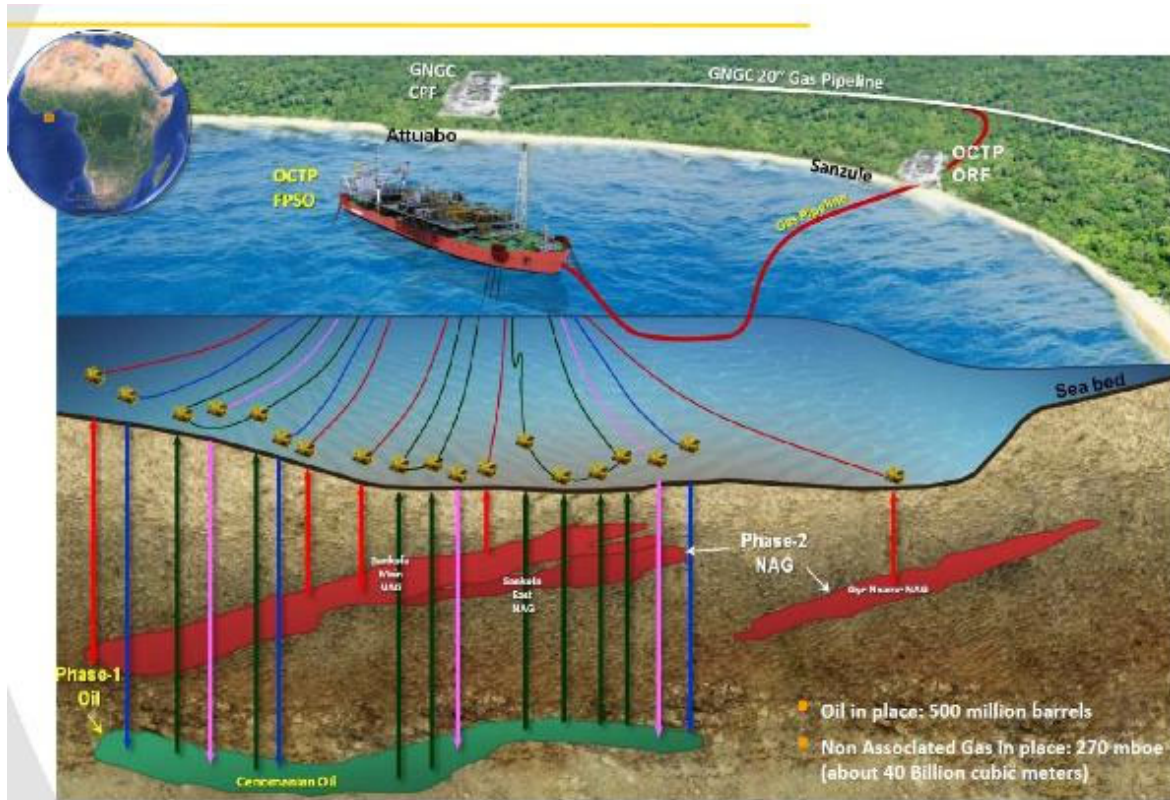
Offshore Cape Three Points

Figure 3-1: Schematic of the OCTP Project (pre infill wells)

Material Project design/scope changes since the ESIA Report was prepared included 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 the nearshore pipeline installation/beach crossing. The changes and execution of associated works have been completed and are described in previous reports rather than be duplicated here.

3.1.1 Status of the Project at time of the monitoring visit

The Project is well into its Production phase with first oil achieved in Q2, 2017 and first gas in Q3, 2018. At the time of the September 2022 site visit:

- The FPSO had been in position and producing oil since mid-2017;
- Drilling and completion of the original 20 subsea wells accomplished (10 oil producing; 5 gas producing, 3 gas injection; 2 water injection);
- Construction of the ORF tie-in to the GNGC gas pipeline completed;
- The GES was installed with gas exported to the ORF since 4th August 2018; post lay trenching (to lower the GES at the beach landfall) was completed in November/December 2018;
- All three compressors were operational and gas was being supplied to the GNGC gas sales pipeline for onward distribution;
- Fencing, including additional fencing needed for security purposes, was erected;
- Reinstatement of disturbed land progressing was ongoing;
- Three infill wells had been completed;
- The upgrade of regulating and metering stations was completed and handed over to the respective operators (see below); and

Offshore Cape Three Points

- The Permanent Accommodation Camp (PAC) was constructed (in Q3, 2019).

The construction of the PAC was the one outstanding construction activity remaining at the time of the IESC last in-country site visit in May 2019.

In addition to the original Project described in the ESIA Report, Eni Ghana took on responsibility for the design and construction of the Takoradi to Tema Interconnector Project (TTIP). Construction works at each of three hubs in Takoradi (GNGC and WAPCo) and Tema (WAPCo) were completed and returned to their respective operators in 2019 and February 2020 respectively. Project Close Out for the TTIP was achieved in July 2020, thus, Eni Ghana does not have ongoing responsibility for these sites and the operation of these sites is not part of the IESC's review scope.



Figure 3-2: Onshore facilities (drone photo in late 2019)



Figure 3-3: Permanent Accommodation Plant (with pilot camp in the background)

Offshore Cape Three Points

In its previous monitoring report the IESC identified a number of activities that were planned for 2021. These activities and their current status are shown in the table below.

Planned Activity	Status (Sept 2022)
Conversion of a gas injection well (GI-3) to an oil producer, anticipated to occur in Q3, 2021	Conversion to oil producer is on hold. No drilling as of September 2022
Load Bank installation on ORF MPGs for generators output optimization	Contract has been awarded and kick off meeting was held on Friday, 8th July 2022. Activities are ongoing.
Non-associated gas (NAG) system debottlenecking to boost the NAG system capacity to 260MMScfd	Internal preparation/readiness ongoing to meet an available shutdown window. In parallel, approval is being sought from Petroleum Commission to undertake the activity.
3rd HP Flash Compression System – installation of 3rd compression train to boost gas injection on FPSO	Feasibility studies ongoing with Yinson, to determine suitable compressor size and module.

In addition, the 2021 AMR reports that a feasibility study will be performed for an Oil Inlet Manifold extension at the FPSO. Eni Ghana intends to develop additional wells for oil production in the future and will carry out a study to check the possibility of:

- Extending the oil production and oil well test manifolds at the port side of the FPSO
- Developing and Tie-in of future wells to the existing network.

Offshore Cape Three Points

4. SIGNIFICANCE ASSESSMENT

4.1 Review Findings

A summary of the review findings is presented in a significance table at the end of each section (see Table 4-1 for an example of the summary table format). For each item, the following is presented:

- The aspect;
- A description of the issue, for example deficiencies or omissions;
- Identification of the standard(s) against which the deficiency or omission has been identified;
- The 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).

4.2 Assessment of Significance

A ranking system has been used to indicate the relative significance of an issue identified during the monitoring visit. As well as highlighting the most important areas requiring attention, it can also be used to aid the tracking and rectification of specific items 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 Applicable Issue is noteworthy, but it is not a matter of non-compliance.

Where time-critical recommendations are made (for example, for specific actions), a timeframe linked to Construction/Production phase milestones is indicated in the IESC Recommendations' column. Time-critical issues can lead to a higher classification of significance. Similarly, findings made in earlier reports that have not been addressed may be given an elevated significance categorisation in this report. Where possible an indicative date for completion is provided in parentheses under the Significance rating.

Table 4-1: Example of the summary table format

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
00	Storm water run-off – monitoring	The ESAP requires <i>Company X</i> monitors the quality of surface water run-off from facilities.	WBG EHS Guidelines	<i>Company X shall expedite procurement of monitoring equipment with the</i>	Moderate (within 3 months of

Offshore Cape Three Points

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
		To date the Company has been unable to procure monitoring equipment – no monitoring has been undertaken.		<i>support of senior management.</i>	issue of this report)

5. LEGISLATIVE FRAMEWORK AND OTHER PROJECT STANDARDS

5.1 Summary of legislative framework

The undertaking of projects such as oil and gas developments requires registration and authorisation by the Ghana Environmental Protection Agency (EPA). The EPA was established under the Environmental Protection Agency Act (Act No. 490 of 1994) as the leading public body responsible for the protection and improvement of the environment in Ghana. The EPA has the authority to require an EIA Report and is responsible for issuing and enforcing requirements specified in environmental permits. Permits are also required from other regulatory bodies including the Petroleum Commission (PC), Energy Commission (EC) and, for projects with coastal/offshore facilities and/or activities, the Ghana Maritime Authority (GMA).

5.2 Permitting

The status of the Project's permits has been discussed in preceding IESC monitoring reports. Following the gradual transition from the Construction to the Production Phase the nature of the Permits has changed, with only a limited number of Production Phase permits required. Key permits and their validity status at the time of the site visit are presented in the table below:

Table 5-1. Status of key permits

Issuing authority	Permit details	Validity (renewal/expiry date)
Ghana Environmental Protection Agency (EPA)	OCTP Block Phase 1_Oil Production Operations Permit	23 March 2023
Ghana Environmental Protection Agency (EPA)	OCTP Block Phase 2_ Gas Production Operations Permit	17 th December 2022
Ghana Maritime Authority (GMA)	Permit to Operate FPSO and Subsea Facilities in Ghana waters.	14 th November 2022
Ghana Maritime Authority (GMA)	Establishment of exclusion safety zones around field and vessels	14 th November 2022
Ghana Maritime Authority (GMA)	Permit to Operate FPSO and Subsea Facilities in Ghana waters.	15 th November 2022
Petroleum Commission (PC)	Production Permit (oil and gas phase)	Renewal process ongoing - application submitted on time

The Project has all the key permits with the exception of the production permit from the Petroleum Commission. Currently Eni Ghana is disputing a request from the Petroleum Commission for production fees on the basis that retrospective imposition of fees would be contrary to the 2006 Petroleum Agreement. The dispute is ongoing but is not impacting on operations.

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

6.1 Requirements specified in the ESAP

The IESC previously reported that all management plans, required under ESAP action 1, had been agreed with WBG/finalised with the exception of the Security Management Plan which although finalised had not been signed. At the time of reporting the IESC is able to confirm receipt of the signed version of the plan, dated November 2020 (see Section 9.2).

6.2 HSE and SLC responsibilities and resources

Organigrammes for the Safety Environment and Quality (SEQ) and SLC team were presented during the site visit. There are no significant changes to the structure and level of resourcing since the previous IESC Monitoring report and therefore they have not been duplicated again in this report. In the previous monitoring report, the IESC highlighted the anticipated planned appointment of an HSE Operations Manager who would report to the HSEQ Manager. The IESC is able to confirm the post was filled shortly after the previous (virtual) site visit and the post remains filled. In addition, Eni Ghana continues to receive specialist support on biodiversity matters from ESL¹⁰, Eni HQ in Milan and Flora and Fauna International¹¹ (FFI). The overall number of staff remains comparable to before and the IESC has no concerns regarding the level of resourcing within the SEQ and SLC teams.

6.3 Audit programme

The IESC reviewed the 2022 audit programme (Ref. prog ms hse 010 eni ghana r10– 2022 HSE Audit Program). The programme provides a detailed schedule for 2022 and a high-level schedule of audits planned from 2023 through to 2025.

Seven key internal/external audits were planned for 2022, including the Ramboll audit (as the Lenders IESC). Audits were targeted at

- ISO 14001 and 45001 compliance (external audit by RINA);
- Contractors HSE compliance;
- Process safety; and
- Legal compliance.

6.3.1 Action tracking register

Eni Ghana continues to maintain an audit findings 'Action Tracker', including responsible parties, timeframes and agreed actions and evidence of closure. The tracker was reviewed during the site visit and is considered to be a maintained tool. High risk HSE or SLC issues are elevated to Senior Management level via periodic meetings where necessary.

6.3.2 HSE Contractors Compliance Audit for 2022

The IESC checked the contractor audit report for Baj Freight and Logistics Limited (effective 11th May 2022). A total of 15 findings (all categorised as Observations¹²) were recorded mainly related to paperwork and evidence of training records. Closure dates for the findings were not specified in the audit report, however the IESC was able to identify the audit actions within the consolidated audit findings action tracker register; 4 audit findings/corrective actions remained

¹⁰ ESL is a specialist environmental consultancy based in Ghana

¹¹ FFI is a specialist biodiversity consultancy based in the UK.

¹² Observations are relatively minor in nature ranking below major and minor non compliances

Offshore Cape Three Points

open. Target dates for the closure of these items should be specified and actions closed in a timely manner noting 4 months have elapsed since the audit.

6.3.3 ISO Recertification Audit

Certificates for ISO 14001 (environment) and ISO 45001 (Occupational Health and Safety) were again provided during the SV with both due to expire in December 2022.

Eni Ghana is also seeking compliance with ISO50001 and conducted an Energy Gap Analysis to inform changes necessary to incorporate energy management within the current management systems.

6.4 Local Development Project - Community Investment Strategy

Since late 2019, Eni Ghana refers to the Community Investment Strategy (CIS) as the Local Development Project-CIS (LDPj-CIS). Its fundamental aim is to promote inclusive economic growth and well-being for 10 coastal communities in the Ellembelle District (which includes the four communities in the Direct Area of Influence, DAoI) over the period 2019 to 2022. The original duration (2019 to 2021) was extended by one year primarily due to delays in completing the CIS Implementation Plan which resulted in postponement of certain planned actions in 2019. There are four main components of the LDPj-CIS:

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

The status of these components and the key actions undertaken during the reporting period are summarised in the sections below.

6.4.1 Water Supply Project

In 2020, a decision was made to extend the Water Supply Project to bring water closer to more potential customers and thus generate additional revenue. This included the construction of three new fetching points (one in Anwolakrom and two in Sanzule) making a total of six fetching points, and refurbishment at the Water Treatment Facility with the installation of a water tank.

The extended project has made potable water more easily available to approximately 5,000 residents of Sanzule (including Anwolakrom), Krisan and Bakanta. Eni Ghana undertook monitoring of usage and availability in October and December 2021¹³, which found that 78% of the 356 surveyed households (based on a 12% sample of households in target communities) used the Water Supply Project as a source of water.

During 2021, Eni Ghana conducted engagement with the Water Board Committee¹⁴ to support the handover of the Water Supply Project to the Committee. A Handover Certificate was signed in June 2021 between the contractors (Stepp Pryme Engineering Ltd or SPEL) and the Water Board Committee. Following the handover, Eni Ghana have continued to conduct engagements with the Water Board Committee, including meetings in August and October 2021. During these meetings the Water Board Committee have reported on minor faults and suspected system leakages. During the August 2021 meeting Eni Ghana provided recommendations for the Water Board Committee to conduct water quality tests at least twice a year, at their own cost.

During the site visit, IESC went to the treatment plant location (Figure 6-1) and spoke with a representative of the Water Board Committee. IESC understands that a facility is being built next

¹³ Eni Ghana, December 2021. Access and Usage of the Eni Ghana Water Project: Monitoring and Evaluation Exercise

¹⁴ A community-based committee that was established to manage the Project's delivery of water on an ongoing basis.

Offshore Cape Three Points

to the treatment plant to allow for the filling of water sachets that can then be sold, and that this initiative is designed to help increase revenues.

As stated in the May 2021 Environmental and Social Monitoring Report, IESC had previously noted that water quality testing at the Water Supply Project indicated past exceedances in water quality against the applicable standards, particularly with respect to phosphate in a May 2021 sample. Within the May 2021 monitoring report, IESC included a recommended action that water quality testing should be conducted until water quality is shown to consistently meet drinking water quality standards. Since May 2021, additional testing has been undertaken by SPEL and was reviewed by Eni Ghana in September 2021¹⁵. This Eni Ghana review found that testing in August 2021 by the Water Board indicated no exceedances except for total coliforms and E.coli counts. As there was concern that contamination had occurred during the sampling process; training was provided to the operations manager on sampling protocols, and a new sample was taken in September 2021. The results of the September 2021 sampling, as reported by Eni Ghana, were that all parameters were within guideline values of drinking water. IESC understands that the Water Board Committee conducts water quality monitoring, and the feedback is that the Committee is satisfied that results indicate that the water is potable¹⁶. Nevertheless, regular water quality monitoring should continue in accordance with applicable national legislation; it is understood that this is the intention.

¹⁵ Eni Ghana, September 2021. Report on Community Water Extension Project: Water Quality Test September 2021.

¹⁶ As any testing is conducted by the Water Board Committee rather than Eni Ghana, IESC has not reviewed water quality testing data.

Offshore Cape Three Points

Figure 6-1: Community Water System treatment plant, with adjacent facility in construction to allow for filling of water sachets.

6.4.2 Education project

The education project consists of two components:

- Capacity-building for school staff (the 'soft' component); and
- Improvements to schools and related infrastructure.

The project covered four basic schools (Sanzule/Krisan, Eikwe and Bakanta) and 400 students for the pilot phase (now completed), and eight basic schools in all 10 communities for the main LDPj-CIS phase, with the aim to reach over 3000 students and over 100 teachers. Progress under these two components is considered below.

Capacity-building Component

The 'soft', capacity building component of the education project includes provision of teacher training in competency-based approach, human rights approach, organic agriculture, sports and COVID-19 prevention methods for all 10 communities in Eni Ghana's Area of Influence. The training is provided to existing teachers¹⁷ and is designed to enhance their competency. At the time of the site visit this component was 73% completed, with a timescale for completion running to December 2022. The Italian NGO, *Volontariato Internazionale per lo Sviluppo*, has been contracted by Eni Ghana to continue to provide this capacity-building support for education.

¹⁷ All of the teachers required for the schools are from the existing schools, and so the Project has provided training to existing teachers in the local schools rather than seeking to increase the number of teachers

Offshore Cape Three Points*Infrastructure Component*

The infrastructure component of the education project involves the refurbishment of existing school buildings, the installation of solar panels, the construction of new facilities (staff rooms, libraries, canteens, toilet facilities, and sports facilities), and the supply of school furniture and sports equipment. Works have been undertaken at the following schools: Asemda primary, Ngalekyi/Baku primary and Junior High School (JHS), Atuabo primary and JHS, Anokyi primary, Anokyi JHS, Eikwe primary, Eikwe JHS, Sanzule-Krisan primary, Sanzule - Krisan JHS, Old Bakanta primary, and New Bakanta primary and JHS. Works have been undertaken by Stepp Pryme Engineering Ltd. and MacWest Limited.

IESC visited a sample of the schools during the site visit. At the time of the visit, physical works at the schools were close to completion, with final landscaping and other minor completion activities being undertaken. The schools are due to be handed over for use from October 2022.

IESC did not observe any environmental or social issues of concern while visiting the sample of schools during the site visit. The works that were observed appear to be highly meaningful improvements to the school facilities, with significant expansions and improvements having been made to the school buildings.



Figure 6-2: Example of a school included in the infrastructure component of the education project.

Offshore Cape Three Points

Figure 6-3: Example of a library developed and furnished as part of the education project.



Figure 6-4: Example of a canteen developed and furnished as part of the education project.

6.4.3 Access to Energy: Rural Clean Cooking Project

This project is a joint multi-phase project with the World Bank and is implemented by Ghana Alliance for Clean Cookstoves and Fuels (GHACCO). The expected benefits of the project are:

- Improved indoor and outdoor air quality with community health benefits;
- Reduced fuelwood use; and
- Quicker cooking times.

Phase One consisted of a Pilot Project over the period November 2020 to March 2021 with 615 wood-fuelled cookstoves, consisting of three different models, distributed to households in the 10 communities.

Following the Phase Two evaluation of the pilot, a Cooperation Agreement was signed with GHACCO on 14th December 2021 for Phase Three. By the end of December 2021, 442 improved cookstoves and LPG cylinders were distributed to individuals in the 10 communities from 29 to 31 December 2021. At the time of the site visit, Eni Ghana reported that 2,654 cookstoves had been distributed to households across 10 communities, and engagement activities had included 12 demonstration sessions and sensitisation sections with 10 social organizations (churches and mosques).

The Project is ongoing until end December 2022 with further distribution of cookstoves, sensitisation activities and monitoring. The end objective of the project is to have distributed 3,000 improved domestic biomass and LPG cookstoves.

6.4.4 Economic Diversification: Building Businesses

The aim of this initiative is to encourage and support residents in the 10 communities in the establishment of small businesses. The project aimed for participation of 800 individuals, with an

Offshore Cape Three Points

emphasis on women and youth. The main support will take the form of a variety of capacity-building activities; however, material support will be provided as necessary on a case-by-case basis. The implementing partner is NBSSI/GEA and a kick-off meeting was held in February 2021, followed by an introduction of NBSSI/GEA to the communities during the period 15 to 17 April 2021 and to the Paramountcy in May 2021.

In February 2022, the project completed the Entrepreneurship and Small Business Management training with 947 individuals in attendance from the 10 communities. A needs assessment for the technical skills training was also completed in the first quarter of 2022. Within the second quarter of 2022, compliance and regulatory training was conducted for registered participants.

At the time of the site visit, Eni Ghana stated that the project is 43% complete and that there had been 1,098 needs assessments completed and 948 people had been trained, of which 645 were female and 303 male. The key planned activities are technical skills training and branding and packaging training. The Building Business project is due to complete by end December 2022.

6.4.5 Economic Diversification: Livelihoods

The 'Livelihoods' component of the Economic Diversification part of LDPj-CIS is well underway. Eni Ghana and TechnoServe Ghana established a Cooperation Agreement in February 2022 to deliver this Livelihoods component through a project referred to as 'Economic Diversification for Ghanaians Living in Embelle', or EDGE. The project aims to improve household food security and economic opportunities by adopting a value chain approach through improved agricultural production and livestock rearing. It seeks to create benefits to the communities within the Project's Area of Influence defined for the LDPj-CIS, specifically Atuabo, Bakanta (Old and New), Ngalekyi, Sanzule (including Anwolakrom), Krisan, Eikwe, Anokyi, Ngalekpole, Asemde, and Baku. This project targets 600 beneficiaries (based on 300 households and 300 market-oriented producers) in these communities.

The EDGE project started in February 2022, with a series of engagement activities undertaken in March 2022 with community leaders, youth representatives and assembly members from the 10 communities. The engagements were used to introduce TechnoServe as the implementing partner and to give details on what the EDGE project entails. A further round of community engagement was conducted in May 2022.

The EDGE project includes the operation of three demonstration sites that are used for training of project beneficiaries. Two sites are for crop farming and one is for poultry rearing. As part of the site visit, IESC visited one of the crop farming sites and the poultry site. TechnoServe representatives described an approach of using expert crop and poultry advisors to provide ongoing training to beneficiaries, with the demonstration sites being used to demonstrate approaches and technologies. For example, the crop farming site included a nursery in which beneficiaries were trained on the importance of and methods for establishing seedlings ([Figure 6-5](#)). The project is engaging with vegetable marketers with the aim to establish bulk offtake agreements for the output, thereby supporting beneficiaries in securing long-term customers for their produce. The project is also working with suppliers of irrigation technologies and seeds to arrange appropriate supplies for the beneficiary farmers. As well as training, beneficiaries are provided with starter packs, which may include seeds and tools for crops or veterinary services and feed for poultry.

The crop-farming demonstration sites have been established with irrigation systems so that the beneficiaries can be informed about irrigation methods. This also allows for year-round irrigation and supports production to be maintained through the year.

At the time of the site visit, the project had received 950 applications, and 290 had been verified and approved, with those participants currently being involved in the project. Applications are

Offshore Cape Three Points

assessed to check that the applicant has adequate land and assets available to support their ability to benefit from the training and support provided under the EDGE project. For crop farming, the application is checked to verify that the applicant has land rights over the land and that there is available water. For applicants who are classed as commercial crop or poultry farmers, the criteria include the requirement for the applicant to contribute to the required investment, meaning that they have to demonstrate financial commitment to the process. There are also eligibility criteria set to allow for the inclusion of youth and women entrepreneurs. A general theme of the project is for the beneficiaries to create sustainable businesses and for them to support themselves rather than requiring ongoing inputs from the project.

IESC understands that the EDGE project will continue into 2023, and that monitoring will be undertaken with a final evaluation report produced at the end of the project. At the time of the site visit, the project was stated as being 19.4% complete.



Figure 6-5: Nursery area of crop farming demonstration site.



Figure 6-6: Part of the poultry demonstration site.

6.5 Cumulative impacts

The ESAP includes a commitment for Eni Ghana to report on its “*best efforts to engage other developers, local institutions and government, and other stakeholders in designing coherent management strategies to mitigate cumulative impacts.*”

Previous IESC monitoring reports have presented Eni Ghana’s progress in this regard though to May 2021 when the previous IESC report was written. In summary this involved:

- Establishing a multi stakeholder co-management platform to manage cumulative impacts with support from the IFC.
- Developing a Terms of Reference for the platform by appointing Oxford Policy Management (OPM) to undertake the study (concluding in June 2020).
- Reconvening the platform members in March 2021 following a change in government.

Offshore Cape Three Points

Key disagreements within the platform were previously reported to include: i) disagreement over the entities which should be party to the platform; and ii) funding of the platform/measures identified by Working Groups.

During this current site visit the IESC was informed that Eni Ghana's efforts to progress the multi stakeholder platform continue with the successful inauguration of a Technical Committee in February 2022. The Technical Committee will direct a number of topic specific Working Groups. A Terms of Reference with priority actions relating to fishing livelihoods and fishing regulations has been developed and shared for review. However, at this stage it is understood that the Terms of Reference has not been agreed and the Working Groups are not yet functioning. Whereas progress has been slow it does allow Eni Ghana ongoing opportunity to influence the Terms of Reference and the priority actions for the Technical Committee/Working Groups. Eni Ghana should therefore use its best efforts to influence the Technical Committee/Working Groups such that objectives outlined in its E&S management plans are reflected in the Working Groups efforts. These should include the actions highlighted in the biodiversity management plans, including:

- Cumulative pressures on sea turtles (increased human disturbance, lighting, poaching), Biodiversity Management Plan, Appendix B, Sea Turtles Biodiversity Action Plan, Table 7.3.
- Cumulative impacts on birds. Biodiversity Management Plan, Appendix A, Avian Biodiversity Action Plan, Table 6.3.

Additionally, IESC recommends the inclusion of population change as a topic for assessment, as outlined in Section 6.6 below.

The IESC has been informed that disagreement over funding for the platform (and therefore any resulting mitigation measures) remains unresolved. The IESC also recognises the limitations facing Eni Ghana as a single operator in the region, but reaffirms the recommendation that Eni Ghana continues to use best efforts to highlight management of biodiversity issues within the Technical Committee, as well as promoting the inclusion of population change as a topic for assessment.

6.6 Influx in the DAoI

The Project has continued to conduct influx monitoring in the closest communities to the ORF (Sanzule and Anwolakrom, Krisan, Bakanta, and Eikwe), and has now completed the following household surveys subsequent to the 2016 baseline:

- First Household Survey in February 2019.
- Second Household Survey in April to May 2021
- Third Household Survey in April 2022.

Estimates of community level populations have been performed using two approaches in 2019 and 2021:

- Using a combination of satellite images and fieldwork, the total number of houses are counted and a multiplier of 4.2¹⁸ is applied to the number of houses to give an 'estimated' population; and
- An interview is held with one member of each household and the respondent is asked to provide the number of household members. This is akin to a census and provides the 'actual' population.

¹⁸ 4.2 is considered by Eni Ghana to be the average size of a household in the DAoI as given by the Ghana Statistical Service in the 2010 Population and Housing Census

Offshore Cape Three Points

These 2019 and 2021 surveys have provided actual and estimated data against which to compare the 2016 baseline data. Eni Ghana have now also incorporated into the analysis the community-level population data from the 2021 Population and Housing Census (PHC), which was conducted by Ghana Statistical Service. This addresses IESC's previous recommendation to use this PHC data as another reference point for analysing population change.

Figure 6-7 presents a summary chart of the actual populations estimated through the 2019 and 2021 surveys, compared against the 2016 baseline and the PHC estimates for 2021. IESC previously commented on these data in the May 2021 monitoring report, except in relation to the new PHC data that have been incorporated into the analysis. The PHC data indicate a higher population than the estimates derived from the 2021 household survey for Bakanta and Eikwe, though lower populations for Sanzule and Anwolakrom and Krisan, with the overall estimate for the populations being 8% higher in the PHC data. These differences may be accounted for by differences in method, rather than in actual differences in population at the times of the surveys.

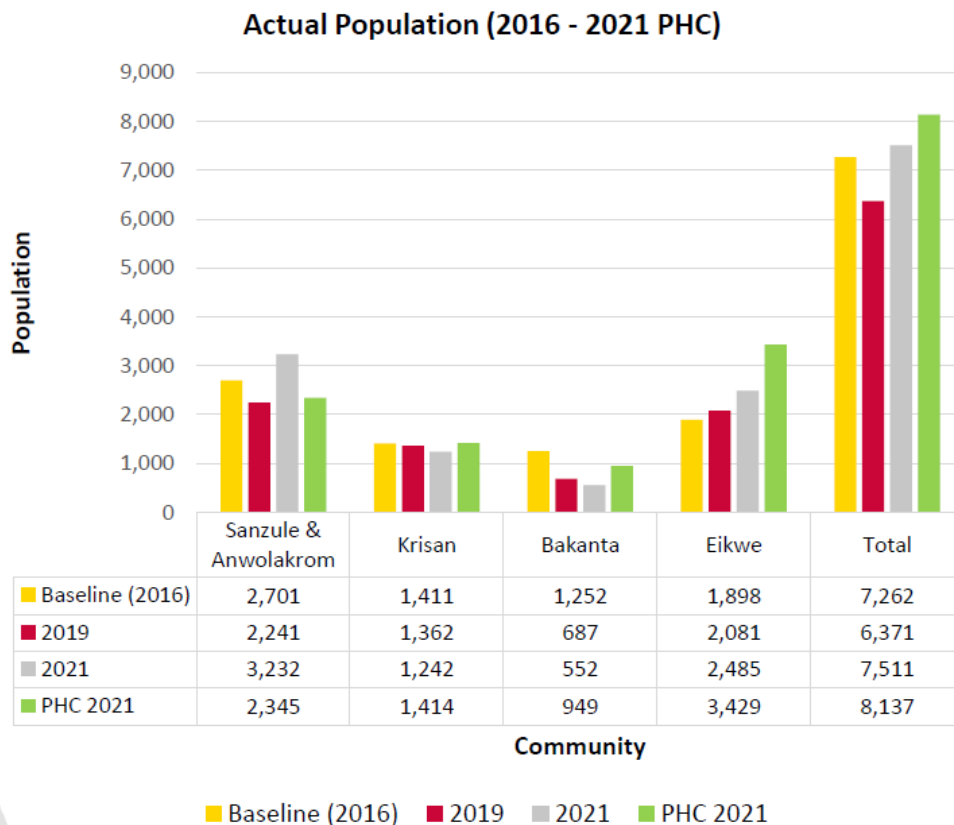


Figure 6-7: Comparison of community-level population estimates for 2016, 2019 and 2021

The Third Household Survey that was conducted in April 2022 was a survey on migration, and was conducted in response to IESC's previous recommendation for the household survey to be adapted to include questions about the origin of the respondent and his/her family members. Questionnaires were administered to 300 randomly selected households in the four communities. Respondents were asked if they were migrants to the area, and if they were, which region they came from. Approximately half of the surveyed households in Sanzule, Krisan and Eikwe stated that they were migrants, while none of the Bakanta surveyed households stated that they were migrants. The origins of the migrant households were principally other regions of Ghana, with few households indicating that they had moved between villages that are within the DAoI. The survey results provided by Eni Ghana do not indicate when the household migrated to the area (which would have been useful to establish links to the project development timeline), but the survey

Offshore Cape Three Points

did include a question about the reason for migrating to the community. Only 5% of the migrant households stated that they migrated for the purpose of Eni or OCTP employment, though 20% reported migrating due to job opportunities from other companies and 26% reported migrating to search for a job.

Consistent with the assessment given by IESC in the May 2021 monitoring report, there remains no conclusive evidence of influx created by the Project, and as the Project has now moved well into the production phase the employment and economic opportunities afforded by the Project/construction workforce have significantly reduced, thus making influx less likely compared to the situation in 2019.

IESC understands that Eni Ghana will continue to do influx monitoring, as stated in the 'Way Forward' section of the influx monitoring report for the April 2022 survey. IESC notes that the future reporting of influx monitoring would benefit from the inclusion of data to reflect population trends in the broader region, i.e. in areas with no impact from the Project. This will help to show if the modest changes in population levels in DAoI communities are similar or different to broader population trends. IESC recommends that the next set of reporting includes the analysis of published data for neighbouring areas as a 'control group' to demonstrate broader population trends that are occurring in the region. This does not need to involve further data collection as IESC anticipates that such time series population data will be available from the PHC or other Ghana Statistical Service datasets.

IESC considers that if the population estimates from the next round of monitoring do not indicate any notable increase in in-migration then that next round of influx monitoring could be the final one. If that is the case then the next set of monitoring should include feedback elicited from local community representatives to verify that the community do not consider influx as an ongoing issue that needs to be monitored.

IESC notes that cumulative impacts on population within the broader region may continue, even if direct Project impacts on DAoI communities are not material. IESC recommends that population change is considered as a topic for inclusion as part of the Cumulative Impacts Management Platform (see Section 6.5) so that such cumulative impacts can be monitored.

6.7 Stakeholder engagement

The OCTP Operations SEP was finalized in June 2019 and is still being implemented. The Project updates the engagement action plan each year for the year ahead, based on the principles and approaches defined in the SEP. The 2021 AMR and the QMRs provide embedded copies of documents pertaining to stakeholder engagement events within their respective time periods. These documents and other information provided by Eni Ghana demonstrate a meaningful level of ongoing engagement with stakeholders on key topics. The SLC team continues to be appropriately resourced with stakeholder engagement officers and community liaison personnel to deliver the stakeholder engagement requirements. The Eni Ghana SLC team reported that from June 2021 to August 2022 there had been 150 engagements with 51 stakeholders.

Eni Ghana is engaging with a variety of groups on an ongoing basis, including:

- Livelihood Restoration Programme Steering Committee and Working Group;
- Local Development Projects Steering Committee;
- Community Water Management Board;
- Grievance Management Committee;
- School Management Committee; and
- Cumulative Impacts Co-Management Platform Technical and Steering Committees.

There are also meetings held with Ellembele District Assembly, community chiefs, community elders, community representatives for women and youth, and the Paramount Chief.

The SLC team use a Stakeholder Management System to record and track engagement activities and actions arising from the engagement. There is a weekly report on engagement activity and a regular management meeting where information on engagement activities is shared.

As part of the engagement activities, Eni Ghana receive a number of requests for support to the community, including extensions to existing community support or new development projects. IESC notes the positive community relationships and engagement that exist to allow such requests to be made, but notes that there is a challenge in sensitively responding to these requests while avoiding long-term dependency on the Company to provide infrastructure and other support to local communities.

During the site visit, IESC observed a number of signs in local communities that had been established by the Project and describe the community grievance mechanism in English and the Nzema local language. The signs describe the process for receiving and investigating grievances and gives the phone number and email address for the CLO to receive grievances (see Figure 6-9 and Figure 66-10). The signs also state the availability of grievance boxes in the local community. Eni Ghana stated that the boxes are located in community centres in each of the communities, though the presence of these were not verified by IESC during the site visit.



Offshore Cape Three Points

Four grievances were received in 2021, of which one was managed by Eni Ghana and three by the contractors for the School Infrastructural Project (SIP). The complaint addressed by Eni Ghana involved damage to a canoe fisherman's fishing nets, which was reportedly caused by the movement of a contractor's vessel. After an investigation, the fisherman received compensation, and the complaint was closed. Two grievances were raised in relation to the infrastructure component of the education project, with one related to accidental damage to a wall in a neighbouring property and one related to the deterioration of a road used by contractors. Both were investigated, resolved and closed. The fourth grievance was raised by the worker of a contractor and was a complaint that they were being spoken to unpleasantly by their supervisor. The grievance was resolved through meetings with the relevant parties and was closed. The timelines for investigation and resolution of the 2021 grievances were appropriate, with three being closed in under 21 working days and the fishing net damage grievance requiring a longer timeline of 86 days due to the complexity of the investigation involving multiple parties.

In the period January to September 2022, five community grievances were received by Eni Ghana, eight community grievances were received by contractors for the school infrastructure project, and two community grievances were received by contractors for the Building Business component of the LDPj-CIS.

The community grievances raised to Eni Ghana related to:

- Irregular pickup of collected plastic waste caused by waste contractor needing to fix their truck, resolved through the contractor fixing the truck and picking up waste, including accumulated waste;
- A perception that the vegetated areas around the ORF was encouraging the movement of reptiles into surrounding residences, resolved through clearing of certain areas of weeds;
- Night-time noise from the ORF being experienced at Anwonlakrom, resolved through replacement of malfunctioning silencers on the air hydration system at the ORF;
- Restrictions imposed on farmers from burning weeds in proximity to the ORF's Tie in area, resolved through provision of compensation to the affected farmers; and
- A complaint that there should have been additional engagement with the community leaders in relation to the school infrastructure project, resolved through a meeting with the community leaders to explain the project's scope and the engagement that had been undertaken.

Community grievances were investigated and resolved within reasonable timescales.

The community grievances received by contractors for the school infrastructure project were site-specific issues related to requests for design changes or to fix issues arising from construction. The grievances were addressed within appropriate timescales of up to 25 working days.

The two grievances related to the Building Business project were a minor issue of a missing record of registration for one applicant, and a minor issue related to the serving of lunch. Both were closed within one working day.

Offshore Cape Three Points**6.9 Emergency Response Planning**

The IESC previously identified a misalignment between the frequency of oil spill response drills specified as mandatory in the AMR template and the actual number of drills performed each year. This issue was raised again during the site visit when the IESC was informed that multiple oil spill drills occur throughout the year and that the table extracted from the AMR and shown below had been completed incorrectly. Following a discussion between the IESC, Eni Ghana and IFC it was agreed that the definition of 'drill' was unclear and therefore the expectations placed on Eni Ghana were also unclear. The IESC believe the intention is for scenario-based oil spill 'exercises' to be conducted periodically and therefore recommends discussion between IFC and Eni Ghana to clarify the expectations and definition of drill. Regardless of the outcome of the discussions, the IESC recommends a full-scale oil spill exercise including the deployment of equipment is conducted in 2023.

Oil Spill Response training for this reporting period				
Activities	Mandatory Frequency	Date(s) Performed	Observed Deficiencies ¹⁷	Corrective Actions and Schedule For Implementation ¹⁸
Drills without equipment deployment	Minimum: three (3)/year	18th November 2021	None	None
Equipment deployment drills.	Minimum: one (1)/year	None	None	None

Figure 6-8. Extract from the 2021 AMR indicating spill exercise frequency

The report associated with the tabletop exercise, dated 18th November 2021 as referenced in the table above, was reviewed by the IESC. The scenario involved a release of oil from an oil transfer hose connecting the FPSO to an export tanker. Deployment of a helicopter and oil spill recovery was also included in the scenario. Given the desktop nature of the exercise the focus was on communications and access to personnel and necessary documentation.

A number of findings were identified along with corrective actions relating to need to add a contact to an emergency Teams channel, a faulty satellite phone, improved communications matrix and additional training needs. There was also a recommendation to carry out a future exercise during a weekend. The desktop exercise was well executed and valuable in that it identified a number of corrective actions.

6.10 Closure of earlier IESC findings

The IESC's May 2021 virtual site visit identified 25 findings, many of which had recommended corrective actions. Where possible the IESC has revisited these findings within this report and described progress made towards the closure of earlier findings. Of the 25 findings made, 7 out of 25 remain open/in progress with the others having either been closed, superseded or on hold.

The 'open' issues identified in the previous monitoring visits are tabulated in Appendix 4 with an indication of the current status of each issue provided by the IESC following this September 2022 site visit. Previously 'closed' items have been removed from Appendix 4.

Offshore Cape Three Points

Table 6-1: Summary of Findings, PS1

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
001_9/22	Audit action tracking	Closure dates for the findings were not specified in a Contractor audit report (Baj Freight) nor in the consolidated audit findings action register; 4 audit findings/corrective actions remained open four months after the audit.	PS1	Target dates and individuals responsible for the closure of these items should be specified and actions closed in a timely manner.	Minor (Q4, 2022)
002_9/22	Cumulative Impacts	Following inauguration of the multi stakeholder cumulative impacts co-management platform, priority actions appear to focus solely on fisheries management. Disagreements over funding mechanisms persist.	PS1	Eni Ghana should use its best efforts to influence the Terms of Reference for the Technical Committee such that it includes consideration of biodiversity issues that align with commitments (ACAs) in the Avian and Sea Turtle BAPs (the IESC acknowledges that fisheries management can make a significant contribution to reducing sea turtle by catch) To the extent feasible, Eni Ghana should also seek to resolve the disagreement over funding mechanisms.	Moderate (not specified)
003_9/22	Emergency Response Planning	There continues to be a discrepancy between the wording of the AMR template and Eni Ghana's schedule for oil spill response drills	PS1	The discrepancy should be resolved with the WBG. The meaning /intent behind the term 'drill' should be clarified such that IFC intent is made clear i.e. simple drill versus larger scale scenario based exercise. Eni Ghana should also conduct an oil spill exercise that includes deployment of oil recovery equipment.	Minor (Q1, 2023)
004_9/22	Permits	Eni Ghana is missing one key permit – the Production Permit issued by the Petroleum Commission. The	PS1	Eni Ghana should keep WBG informed of its efforts to resolve the dispute and to acquire the Production Permit.	Minor (ongoing)

Offshore Cape Three Points

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
		permit is held up due to a dispute around Production fees payable to the Petroleum Commission.			
005_9/22	Influx monitoring	The reporting of influx monitoring would benefit from the inclusion of data to reflect population trends in the broader region, i.e. in areas with no impact from the Project. This will help to show if the modest changes in population levels in DAoI communities are similar or different to broader population trends.	PS1	The next set of influx monitoring reporting should include the analysis of published data for neighbouring areas as a 'control group' to demonstrate broader population trends that are occurring in the region. This does not need to involve further data collection as relevant time series population data may be available from the PHC or other Ghana Statistical Service datasets.	Minor (next round of influx monitoring reporting, or end 2023 whichever is earliest)
006_9/22	Influx monitoring	If the population estimates from the next round of influx monitoring do not indicate any notable increase in in-migration then that next round of influx monitoring could be the final one. If that is the case then the next set of monitoring should include feedback elicited from local community representatives to verify that the community do not consider influx as an ongoing issue that needs to be monitored.	PS1	The next influx monitoring report should include feedback elicited from local community representatives to verify whether the community consider influx as an ongoing issue that needs to be monitored. If the results of the next round of monitoring and the feedback elicited from local community representatives indicate that there is no measurable influx attributable to the Project then the Project-level influx monitoring activity can be ended.	Minor (next round of influx monitoring reporting, or end 2023 whichever is earliest)
007_9/22	Population change as part of cumulative impacts	IESC notes that cumulative impacts on the population within the broader region may continue, even if direct Project impacts on DAoI communities are not material.	PS1	As part of Eni Ghana's engagement with the steering and technical committees of the Cumulative Impact Co-Management Platform, recommend that population change is considered as a topic for inclusion in the work of the platform.	Minor (end Q2 2023)

Offshore Cape Three Points

7. PERFORMANCE STANDARD 2: LABOR AND WORKING CONDITIONS

7.1 Introduction

This section covers the following topics:

- Demobilisation of workers;
- Equal opportunity for women workers and potential for workplace harassment;
- Contractor management of worker welfare;
- Worker accommodation;
- Mental health support; and
- Occupational Health and Safety.

As context, **Error! Reference source not found.** presents the employment breakdown for the main operational facilities: the ORF and the FPSO. The total workforce at each site is provided for both direct workers (that is employed by Eni Ghana) and for contracted workers; however, the breakdown of the employment data into worker categories (such as females or workers from the DAoI¹⁹) applies to the total number of workers only. With no significant changes in operations since May 2021, the Project has not had notable demobilisations of workers, with relative stability in the numbers and composition of the workforce.

Table 7-1: 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
	12/2020	43 (35:8)	0	39	0	4
	04/2021	114 (32:82)	18	108	48	6
	06/2022	132 (35: 97)	17	108	27	23
FPSO	12/2019	209 (15:194)	1	130	0	79
	12/2020	199 (16:183)	1	129	0	70
	04/2021	201 (16:185)	1	135	0	66
	06/2022	212 (15: 197)	1	151	0	61

Source: Data for 06/2022 from Quarter 2 2022 QMR. Data for previous periods as reported in IESC monitoring report for May 2021.

7.2 Demobilised DAoI workers and re-integration into the local economy

Following the construction phase peak in May 2018 of almost 1600 workers, demobilisation of workers from the ORF at the end of construction commenced in 2018, and since 2019 Eni Ghana have conducted demobilisation surveys to assess the reintegration of local workers into the local communities. The first survey was conducted in 2019 (see IESC Monitoring Report from May 2021). A repeat of the demobilisation survey was conducted in April 2022 and involved interviews of 250 previously demobilised workers in the communities of Sanzule, Bakanta, Krisan and

¹⁹ DAoI is the Direct Area of Influence (of the OCTP Project), consisting of four nearby villages.

Offshore Cape Three Points

Eikwe. Most of the respondents were helpers during the construction phase, though there were also semi-skilled and skilled construction workers included in the sample.

The key findings of the April 2022 demobilisation survey included²⁰:

- 29% of those surveyed stated that they were unemployed before employment at the ORF, compared to 24% who stated that they were unemployed at the time of the survey.
- 141 of the 250 respondents (56%) stated that they had formal employment at the time of the survey, and of these 66 were employed at the ORF, 65 on the School Infrastructure Project, 2 on the Community Water Project, and 8 on other construction projects in the community.
- Although fishing was a common livelihood activity prior to employment during the construction phase, relatively few people (5%) have continued fishing in 2022. Eni Ghana's report on the survey notes that this is due to challenges in the fishing sector with low catch levels and due to the availability of work on the school infrastructure project for those who preferred to continue with formal employment.

These findings indicate that the demobilisation from the Project construction phase has not created high levels of unemployment in local communities, and that actually many of the demobilised workers have found ongoing employment in Project-related activities.

IESC notes the value of conducting the demobilisation surveys, and that the surveys have not indicated adverse impacts from demobilisation in terms of employment levels within the local communities.

In relation to the completion of the School Improvement Project, Eni Ghana described appropriate approaches for checking that workers were being demobilised in an appropriate manner. Contractors provide Eni Ghana with a monthly report on demobilisation, and there are then checks that demobilised individuals have been paid and workers are provided with certification to indicate that they have worked on the project and to state the training that they have received.

7.3 Equal opportunity for women workers and potential for workplace harassment

IESC notes that the numbers of female employees at the ORF and FPSO are low, with 17 at the ORF (out of 132 people in total) and 1 at the FPSO (out of 212 people in total), as of Quarter 2 of 2022 (Table 7-1). The proportion of female workers in Accra is substantially higher, with approximately one-third of Eni Ghana and one-half of contractor workers in Accra being female. The low levels of participation by females in the ORF and FPSO workforce may arise from a variety of factors, and there may be limits to the availability of skilled female workers available to work the required shift and rotation patterns at the remote sites for a variety of cultural, economic and historic reasons. Although Eni Ghana apply approaches for a gender-friendly workplace, including smart working and gender-neutral job postings, they have not conducted a systematic review of the potential barriers to higher participation by women in the ORF and FPSO workforce. IESC recommends that such a review is done to firstly identify whether there are any work practices or issues (e.g. sexual harassment) that are directly or indirectly limiting participation by women, and secondly to identify measures to revise these practices and help ensure equal opportunity and a supportive work environment for women at the ORF and FPSO. IESC recommends that this review would include requests for feedback from past and present Eni Ghana and contractor women workers to understand potential barriers that they faced in relation to employment at the ORF and FPSO.

²⁰ Eni Ghana, April 2022. Demobilised Community Workers' Survey Report.

Offshore Cape Three Points

IESC also notes that the low number of women workers at the ORF and FPSO has the *potential* to heighten risks of gender-based violence and harassment (GBVH) for these women, particularly given the remote nature of the sites²¹. IESC emphasises that no evidence was found during the site visit that this potential risk was occurring, and the women interviewed as part of the worker interviews reported no such issues. However, IESC considers that it is a potential risk in the work environment at the ORF and FPSO and the risk requires robust safeguards given the potential severity for women workers if the risk were to materialise.

Eni Ghana reported the steps to address this risk include the Code of Ethics which is trained each year, and a harassment policy that is being rolled out across the Project. The harassment policy is an Eni Management System Guideline 'Eni against violence and harassment in the workplace' (dated December 2021) that applies to subsidiaries and has the objective to state the principles and the prohibited conduct to ensure a working environment free from any form or type of violence and harassment. This Guideline is a clear and robust basis for setting policy and expectations on violence and harassment. There is also reference to prohibition of violence and harassment in the ORF accommodation camp rules, though these do not describe the types of harassment that are within the scope of the prohibition and do not refer to gender-based violence. IESC recommends the following additional safeguards:

- The inductions provided for all workers on arrival at the ORF and FPSO to include training on GBVH, using the 'Eni against violence and harassment in the workplace' Guideline as the basis for training.
- Ongoing awareness campaign on the strict prohibition of GBVH, including clear descriptions on what is considered unacceptable behaviours, also to be based on the Eni guideline.
- Workers to be made aware of gender-sensitive ways of reporting GBVH concerns, such as a through a woman Eni Ghana point of contact.

7.4 Contractor management of worker welfare

IESC undertook two group interviews with workers from two contractors working at the ORF. The workers provided feedback on a number of positive aspects related to their working conditions, with workers reporting that they have contracts of employment, are generally paid on time, are satisfied with the occupational health and safety provisions, have no issues of concern related to accommodation, and reported that they have access to the clinic if they need medical care. However, the workers also reported some issues of concern that:

- Overtime is paid at rates lower than their standard wages.
- There were some poor supervisory practices, with one case reported of verbal abuse of workers, and some workers have concern of retribution when raising grievances due to these supervisory practices.
- Management sought to influence workers over workers' decisions on unionisation.
- Workers did not receive pay increments when renewing contracts.

Within the scope of the site visit the IESC has not been able to verify the accuracy of the reported issues or to further investigate the prevalence of the issues stated above. Accordingly, IESC cannot confirm the extent to which the reported concerns represent non-compliances with the applicable standards. IESC does, however, note that these issues raised by the workers may be indicative of a grievance mechanism that is not adequately capturing and remedying grievances (see Section 6.8) and may be indicative of gaps in the monitoring of contractor worker welfare issues by Eni Ghana. IESC recommends that Eni Ghana conduct a review of the issues as stated above amongst Contractor workers and define corrective actions as required. The identification of corrective actions should consider the potential need for changes in worker

²¹ As a proxy indicator of the contextual GBVH risk for women in Ghana, the Institute of Development Studies and Ghana Statistical Services report *Domestic Violence in Ghana: Incidence, Attitudes, Determinants and Consequences* (2016) found that 30 per cent of surveyed women experienced domestic or non-domestic sexual violence at least once over their lifetime.

Offshore Cape Three Points

welfare monitoring, potentially to include increased discussions with contractor workers by Eni Ghana on a regular basis as well as part of audits conducted on contractor performance.

IESC was provided with a copy of a contractor audit performed by Eni Ghana in 2021, as an example of the scope of contractor audit undertaken by the Project. This audit report showed that labour and working conditions are included within the scope of the audit, but the approach is limited to interviews with contractor representatives and does not involve direct discussions with workers to identify any issues of concern. Such worker discussions may have been limited since 2020 due to COVID-19 control protocols. Changes in these protocols would allow such discussions to take place as part of future contractor audits, and IESC recommends that confidential discussions with a sample of contractor workers are used to check for non-compliances with labour and working condition requirements.

7.5 Worker accommodation

The IESC undertook a walk-through of the Pilot and Permanent accommodation blocks at the ORF. The accommodation provided to workers is low occupancy, typically with one person per room. At times of higher occupancy at the ORF some of the larger Executive rooms are reconfigured for three-person occupancy. All rooms visited provided adequate facilities (en-suite bathroom, air conditioning, smoke detectors, lockable cupboards) and no issues were identified in relation to cleanliness and housekeeping (see Figure 7-1 and Figure 7-2). The ORF accommodation includes recreation facilities, with an outdoor sports facility, indoor table games, and TV in rooms.

Offshore Cape Three Points

Figure 7-1: Example of a single-person room in the Permanent Accommodation block



Figure 7-2: Example of a single-person room in the Pilot Accommodation block

The existing COVID-19 restrictions in place by Eni Ghana require that contractors have their workers accommodated at the ORF (within a COVID-free bubble²²) during their rotation. IESC notes that once the COVID-19 restrictions are relaxed, there is the potential for contractors to establish accommodation units for their workers in local communities. IESC recommends that Eni Ghana monitor the establishment of any contractor accommodation and if such accommodation is established that Eni Ghana conduct monitoring to verify that the accommodation addresses the applicable standards for worker welfare and safety, and that it does not present a risk to community health, safety and wellbeing.

7.6 Mental health support

The ORF clinic provides health support for all workers at the ORF, including chronic disease management and emergency medical response. Some dietary and lifestyle awareness campaigns are provided at the ORF, and Eni Ghana provide stress awareness training annually. The Eni Ghana Health Team is available to support workers presenting with mental health issues, including diagnosis and referral to mental health support services. However, while support services are available to respond to workers raising mental health concerns, there appears to be limited support to workers at the ORF and FPSO to create awareness of mental health issues, to reduce stigma, and to proactively encourage workers to seek support for mental health issues. These provisions are important given the work practice of 28-day rotations at remote sites, which have the potential to limit the support networks (family, friends, medical care) that are available to workers.

²² All workers entering the ORF facilities must take a PCR test to demonstrate they are COVID free prior to entering the ORF.

Offshore Cape Three Points

IESC recommends that a mental health awareness campaign is run periodically at the ORF and FPSO to support awareness of mental health issues and to signpost to available support resources, including those provided by Eni Ghana.

7.7 Worker grievance mechanism

In the period January to September 2022, two worker grievances were received by contractors. The two contractor worker grievances related to the non-payment of quarantine and other allowances and also for delay in wage payments for one of the contractors. The grievances were resolved within 11 working days with the payment of the allowances / delayed wage being made.

Eni Ghana demonstrated good awareness of the resolution of grievances received by contractors, indicating that they retain oversight of contractors during this process. Eni Ghana have also provided evidence that they have communicated the grievance mechanism to their contractors, with an example provided of the training given to the contractors for the infrastructure and 'soft' training component of the education project.

IESC understands that the worker grievance mechanism is well established for Eni Ghana workers, with grievances raised through the union as per the Collective Bargaining Agreement and with the additional option to raise grievances through the Eni Ghana intranet or through grievance boxes. Eni Ghana representatives described that contractor workers can also submit grievances through the grievance box and local contractor workers can raise grievances to the Community Liaison Officers (CLO). IESC notes that with COVID-19 restrictions at the ORF and with the offshore nature of the FPSO, there may be no or limited opportunity to have in-person contact with the CLOs while working at these sites on rotation. Given the length of rotations (i.e. 28 days) this leaves a long period of time in which local contractor workers may not have an opportunity to raise grievances in-person to a CLO, although it is understood that grievance boxes are available. IESC notes that during the interviews with contractor workers some issues were raised that indicated that grievances may not be being adequately identified through the grievance mechanism. IESC therefore recommends that Eni Ghana review the methods through which local contractor workers can raise grievances directly to Eni Ghana, and specifically if they are not achieving resolution through their employer or if they have concern about confidentiality and retribution. This review should ensure that there are clearly communicated methods available for contractor workers at the ORF, FPSO and other work sites to raise grievances in writing or verbally, including with options to do so anonymously.

7.8 Occupational health and safety**7.8.1 H&S Performance**

Eni Ghana continues to implement robust HSE and SLC Management Systems and demonstrate a strong H&S culture which is reflected in positive Project H&S metrics. The strong performance is clearly demonstrated by Figure 7.3 which shows one incident in the Total Recordable Incidents category (Fatalities, Lost Time Incidents, Restricted Workday and Medical Treatment cases) in 2021 and zero for 2022 through (January through to August 2022, which compares favourably with industry standards²³.

The Lost Time Incident indicated for 2021 in the figure below is not recorded in the Project's 2021 Annual Monitoring Report (AMR). It is understood this relates to an incident occurred in a different concession block during the drilling activities of Eban 1X and therefore outside the scope of the OCTP Project and not reported in the AMR annual reporting.

²³ IOGP safety performance indicators for reporting companies in 2018 indicate 1 TRIR/one million hours worked. Ref. IOGP Safety Performance Indicators - 2018 data.

Offshore Cape Three Points

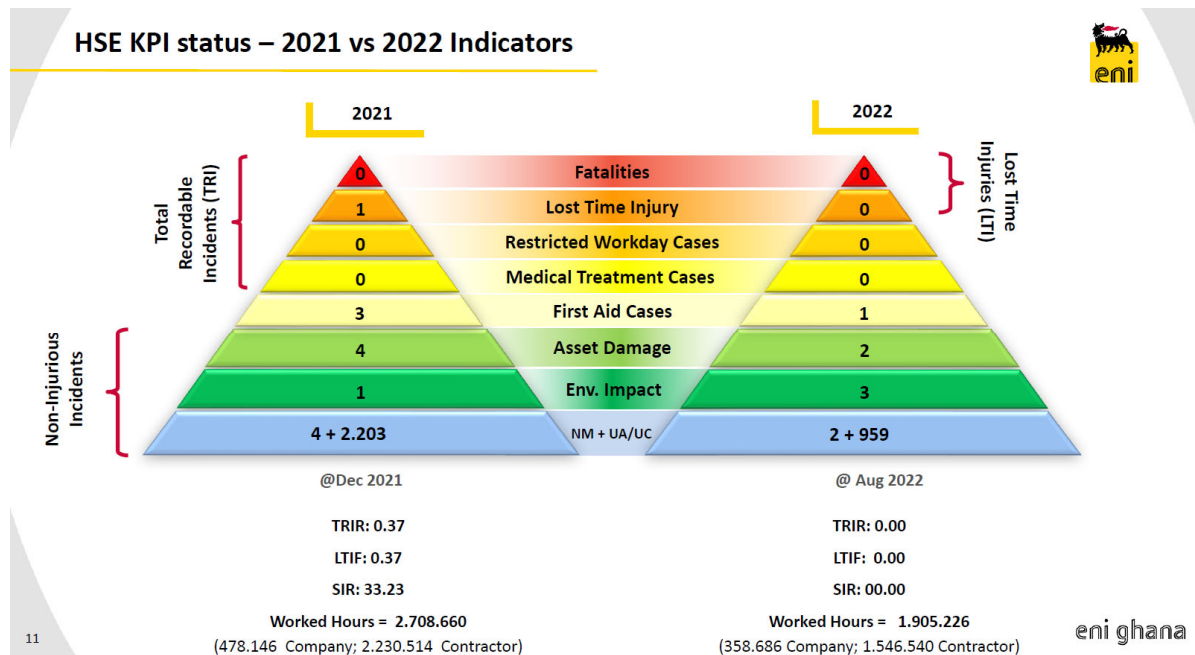


Figure 7-3: Key HSE Key Performance Indicators for 2021 and 2022²⁴

The walkover inspection of the ORF facility did not result in any observations of poor HSE practice. The IESC was shown evidence of the electronic Permit to Work system (ePTW) and was pleased to observe that work permit requests had been rejected pending further information requested by the 'approver'. The ePTW is reportedly extended to the Takoradi logistics base²⁵.

The IESC did observe a number of workers at a construction site associated with a community project (football ground). Whereas the IESC did not undertake a full inspection, brief observation seemed to indicate workers that were not in full PPE. Although not a major issue, the IESC takes this opportunity to remind Eni Ghana that strict H&S requirements must be applied consistently during construction activities under which Eni Ghana maintains institutional control, including both the permanent facilities and smaller scale community investment projects.

7.8.2 HSE training and initiatives

Multiple training programmes and ways of working continue to be ingrained in Eni Ghana's operations (induction and refresher training, toolbox talks, job safety analyses and permits to work etc.). The IESC has reviewed the 2021 HSE training programme and views it to be appropriate in terms of scope and coverage, noting it applies to Eni Ghana employees and contractors. In 2021, training sessions, often utilising external trainers, included but was not limited to the following: incident investigation, HSE supervision, awareness of IFC requirements, oil spill, auditor training, functional safety and SILs, NEBOSH and process safety. The training programme for 2022 was not provided for review. See earlier reports for more details on training programme development/Need analysis approach.

The IESC's view regarding safety within the Project is unchanged with a strong safety culture continuing to be in place.

²⁴ NM + UA/UC refers to Near Misses plus Unsafe Acts/unsafe conditions. Relevant refers to those deemed to present an actual potential risk of incident.

²⁵ A similar ePTW system is used by Yinson on the FPSO.

Offshore Cape Three Points**7.8.3 COVID-19 protocols**

At the time of the visit, national restrictions had been largely lifted. Eni Ghana had relaxed the measures described in the previous virtual site visit report but maintained social distancing and use of face masks in the Accra offices building and all workers/visitors to the ORF/FPSO are still required to test negative with a PCR test before entering ORF buildings/interacting with ORF workers. The Eni Ghana workforce is encouraged to accept vaccinations.

Offshore Cape Three Points

Table 7-2: Summary of Findings, PS2

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
008_9/22	Worker grievance mechanism	IESC notes that with COVID-19 restrictions at the ORF and with the offshore nature of the FPSO, there may be no or limited opportunity for local contractor workers to have in-person contact with the CLOs while working at these sites on rotation. Given the length of rotations (i.e. 28 days) this leaves a long period of time in which local contractor workers may not have an opportunity to raise grievances in-person to a CLO.	PS1 and PS2	Eni Ghana review the methods through which local contractor workers can raise grievances directly to Eni Ghana, and specifically if they are not achieving resolution through their employer or if they have concern about confidentiality and retribution. This review should ensure that there are methods available for contractor workers at the ORF, FPSO and other work sites to raise grievances in writing or verbally, including with options to do so anonymously.	Moderate (end Q1 2023)
009_9/22	Health and safety performance	The Lost Time Incident indicated for 2021 in the HSE presentation is not recorded in the 2021 Annual Monitoring Report. The nature of the incident is therefore unclear to the IESC.	PS2	Eni Ghana to confirm whether there was an LTI in 2021. If an incident occurred, the incident report should be provided to the IESC and Lenders.	Minor (Q4 2022)
010_9/22	Participation of women in the workforce	The low levels of participation by women in the ORF and FPSO workforce may arise from a variety of factors, and there may be limits to the availability of skilled woman workers available to work the required shift and rotation patterns at the remote sites for a variety of cultural, economic and historic reasons. Although Eni Ghana apply has approaches for a gender-friendly workplace, including smart working and gender-neutral job postings, they have not conducted a systematic review of the potential barriers to higher participation by women in the ORF and FPSO workforce.	PS2	Undertake a review to firstly identify whether there are any work practices that are directly or indirectly limiting participation by women at the ORF and FPSO, and secondly to identify measures to revise these practices and help ensure equal opportunity and a supportive work environment for women at the ORF and FPSO. The IESC recommends that this review would include requests for feedback from past and present Eni Ghana and contractor women workers to understand potential barriers that they faced in relation to employment at the ORF and FPSO.	Minor (by end Q1 2023)

Offshore Cape Three Points

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
011_9/22	Potential for gender-based violence and harassment at the ORF and FPSO	IESC also notes that the low number of women workers at the ORF and FPSO has the potential to heighten risks of gender-based violence and harassment (GBVH) for these women, particularly given the remote nature of the sites.	PS2	<p>IESC recommends the following additional safeguards are implemented to support the existing safeguards for this risk:</p> <ul style="list-style-type: none"> The inductions provided for all workers on arrival at the ORF and FPSO to include training on GBVH, using the 'Eni against violence and harassment in the workplace' Guideline as the basis for training. Ongoing awareness campaign on the strict prohibition of GBVH, including clear descriptions on what is considered unacceptable behaviours, also to be based on the Eni guideline. Workers to be made aware of gender-sensitive ways of reporting GBVH concerns, such as through a woman Eni Ghana point of contact. 	<p>Minor</p> <p>(by end Q1 2023 demonstrate that these measures have been implemented, and then apply on an ongoing basis)</p>
012_9/22	Contractor management of worker welfare	IESC undertook two group interviews with workers from two contractors working at the ORF and some issues of labour and working conditions were raised. The issues raised by the workers may be indicative of a grievance mechanism that is not adequately capturing and remedying grievances from contractor workers and may be indicative of gaps in the monitoring of contractor worker welfare issues by Eni Ghana.	PS2	Eni Ghana to conduct a review of the reported issues amongst contractor workers and define corrective actions as required. The identification of corrective actions should consider the potential need for changes in worker welfare monitoring, potentially to include increased discussions with contractor workers by Eni Ghana on a regular basis as well as part of audits conducted on contractor performance.	<p>Moderate</p> <p>(by end Q1 2023)</p>

Offshore Cape Three Points

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
013_9/22	Contractor management of worker welfare	The existing COVID-19 restrictions in place by Eni Ghana require that contractors have their workers accommodated at the ORF during their rotation. IESC notes that once the COVID-19 restrictions are relaxed, there is the potential for contractors to establish accommodation units for their workers in local communities, and there is a potential risk that any such accommodation does not address the applicable standards for worker welfare and safety or presents a risk to community health, safety and wellbeing.	PS2	Following changes to the requirements for contractor workers to be accommodated at the ORF, Eni Ghana to monitor the establishment of any contractor accommodation in local communities. If such accommodation is established Eni Ghana should conduct monitoring to verify that the accommodation addresses the applicable standards for worker welfare and safety, and that it does not present a risk to community health, safety and wellbeing.	Minor (report updates as part of each QMR during 2022)
014_9/22	Mental health support for workers	While support services are available to respond to workers raising mental health concerns, there appears to be limited support to workers at the ORF and FPSO to create awareness of mental health issues, to reduce stigma, and to proactively encourage workers to seek support for mental health issues. These provisions are important given the work practice of 28-day rotations at remote sites, which have the potential to limit the support networks (family, friends, medical care) that are available to workers. While IFC PS2 is not specific on requirements for mental health support, IESC considers that with the length of rotation at remote sites, such support is an applicable requirement to address employer responsibilities for occupational health and safety as per IFC PS2 paragraph	PS2	A mental health awareness campaign should be run periodically at the ORF and FPSO to support awareness of mental health issues and to signpost to available support resources, including those provided by Eni Ghana.	Minor (first awareness campaign to be completed by end Q1 2023)

Offshore Cape Three Points

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
015_9/22	Contractor audits	IESC was provided with a copy of a contractor audit performed by Eni Ghana in 2021, as an example of the scope of contractor audit undertaken by the Project. This audit report showed that labour and working conditions are included within the scope of the audit, but the approach is limited to interviews with contractor representatives and does not involve direct discussions with workers to identify any issues of concern. Such worker discussions may have been limited since 2020 due to COVID-19 control protocols. Changes in these protocols would allow such discussions to take place as part of future contractor audits.	PS2	Confidential discussions with a sample of contractor workers should be used as part of contractor audits to check for non-compliances with labour and working condition requirements.	Moderate (show example of implementation in a contractor audit by end Q1 2023)

8. PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION

This section considers the management and monitoring of key environmental impacts associated with the Project and the Project's commitments to the prevention of pollution and promotion of resource efficiency. Key aspects relevant to the Project include:

- Offshore environmental monitoring (water, sediments, fauna and air quality)
- Surface water;
- Wastewater effluent;
- Groundwater;
- Air quality (including stack emissions);
- Noise; and
- Greenhouse gas emissions.

8.1 Oil sheen

Eni Ghana reported an oil sheen in proximity of the FPSO in its 2021 AMR (and via notifications to IFC). The sheen was detected close to OP-7 well in May 2021²⁶ and identified to be a leak from the Xmas tree which was subsequently controlled by injection of methanol. Ongoing monitoring resulted in further sheens being detected in January 2022 and intermittently in May, June, July and August 2022. On each occasion interventions (use of sealing chemical and methanol injection) have taken place to halt the leak. At the time of the site visit there had been no evidence of a sheen for the preceding 4 weeks and the temporary fix appeared to be working. However, Eni Ghana recognises that a permanent fix, involving the replacement of the Xmas tree, will be required in the longer term.

The IESC was informed that the matter is being dealt with at the highest Eni Ghana management level and within Eni HQ. Discussions are currently ongoing with the manufacturer of the Xmas tree, however replacement of the Xmas tree will be a complex task and the IESC was informed that it is unlikely to happen before 2024. In the interim the following measures have been put in place:

- constant monitoring via satellite images (archived in GIS);
- water sampling and analysis;
- an assessment of the environmental impacts resulting from the oil sheens and loss of methanol; and
- Local Authorities (EPA, PC) regularly updated.

Eni Ghana has the ability to shut down OP7 at any time and thereby stop any further oil release although the criteria for shutting down is unclear. Moving forward, Eni Ghana should continue to closely monitor for oil releases and inform relevant stakeholders as appropriate, including fishermen, should they use the affected area. It should also develop a road map/action plan for the permanent solution and report progress against the action plan to the WBG and the IESC via existing communication mechanisms e.g. monthly operations reports and QMRs. Finally, criteria for shutting down the well should be predetermined to avoid a prolonged decision-making process in the event of future releases/increased severity of the release.

²⁶ Sheens extending over an area of 11km² have been detected using satellite radar. This volume of oil associated with a sheen over this area has been estimated to equate to a release of between 0.44 and 3.3 m³. The total estimate of uncontained release amounts to tens of barrels over an extended time period.

Offshore Cape Three Points**8.2 Offshore monitoring campaign**

Eni Ghana has performed a series of biennial offshore monitoring campaigns with previous campaigns undertaken in 2017 and late 2018. Both these campaigns were led by the specialist oceanographic survey company, Tecnoambiente based in Spain, with support from ESL. A further campaign was scheduled for mid-2021 but was delayed until April 2022 because of COVID-19 travel restrictions. At the time of the recent site visit the campaign report had not been finalised, however the IESC met virtually with a new survey team from Freddie Jordan Oil Company Limited, the Company commissioned to undertake the 2022 monitoring campaign.

The offshore sampling programme was intended to duplicate earlier campaigns with the following objectives:

- Determine water column characteristics in the study area;
- Assess planktonic communities;
- Determine characteristics of the seabed sediment, with specific reference to various biological, physical, and chemical sampling parameters;
- Document the existing state of the marine environment;
- Carry out air monitoring to evaluate impacts to air quality from offshore activities

The scope of the survey was comprehensive and broadly in line with the programme detailed in Eni Ghana's Environmental Monitoring Programme. However, it is noted that some of the sampling coordinates provided by Eni Ghana had not been previously sampled in 2017 and/or 2018. Also of note, the survey was conducted in April and May whereas the preceded campaign in 2018 was conducted in November and December.

Key findings from the survey campaign are as follows:

- Certain nearshore arsenic and barium concentrations in sediments were elevated compared to 2017/2018.
- Metal concentrations in offshore sediment were generally lower in 2022, except for arsenic and barium in isolated cases.
- Total petroleum hydrocarbons were elevated in 4 sampling locations (up to 3,400 mg/kg) although below Dutch intervention values of 5000 mg/kg set for impacts to infauna.
- Air quality measurements, intended to assess the impact of the flare on the FPSO, were below international threshold limits with the exception of
 - one station, 2 km SW of the FPSO for SO₂ and
 - a second station 6km NE of the FPSO where PM₁₀ measurements were elevated.

The survey team believe these were anomalous results, on the basis that the wind direction was not from the FPSO/distance from the flare.

It is understood that sampling points on the vessel were positioned to avoid influence from the vessel's exhaust. Nevertheless, it is highly likely that the elevated SO₂ and PM₁₀ measurements will be a result of vessel emissions rather than the FPSO. The IESC questions the value of air quality sampling around the FPSO given the lack of receptors 60km offshore and was informed at the time of the site visit that it might be driven by Ghana EPA requirements. Eni Ghana has subsequently confirmed it is not a requirement of the Ghana EPA to undertake offshore ambient air quality measurements.

Offshore Cape Three Points

Noting that the survey report is currently in preparation the IESC will await its completion before reviewing in detail. In the interim, the IESC makes the following comments:

- The influence of seasonality on survey results, if any, should be described in the report.
- Sample results from the recent survey should be compared with both 2017 and 2018 results and any baseline survey results where possible.
- Careful interpretation of the elevated As and Ba results in sediments, including toxicity on benthos and commentary on whether the same locations had been previously sampled in 2017/18.
- Lesson learned should be clearly described, for example, problems associated with laboratory analysis timeframes that may have invalidated total coliform results.

8.3 Onshore Monitoring**8.3.1 Surface water**

Since June 2020, ESL has been undertaking a quarterly monitoring programme, sampling from the same locations used during the construction phase. The sampling programme meets with the requirements specified in the Onshore Environmental Monitoring Programme for Production Phase of OCTP Phase 2 (prg ms hse 011 eni ghana r00).

The two key concerns previously reported by the IESC that relate to surface water include: i) Project induced deterioration in water quality; and ii) potential changes to hydraulic connectivity (with secondary impacts to swamp areas) caused by the positioning of some culvert piping above the water level outside of the wet season. ESL's monitoring continues to show water quality was generally within surface water parameters and comparable with baseline values. ESL concluded that exceedances were attributed to natural variations (heavy rainfall events) and community interactions. Water level measurements indicate fluctuations in line with rainfall, with gauges in proximity of the Project behaving similarly to an upstream control gauge. Importantly, water level measurements within the concession have not shown any changes in swamp level (flooding or drying out) due to the Projects construction i.e. there is hydraulic connectivity across the site with road culverts performing well (Appendix 5, see Photo 5).

From the IESC's own observations, there has been successful reinstatement of disturbed land since the cessation of construction which significantly reduces the potential for erosion and sedimentation of surface waters. Oil interceptors appear to be properly constructed and well maintained.

8.3.2 Waste-water effluent

The IESC previously reported exceedances (total Coliforms and E Coli levels) in effluents discharged from the PAC and Pilot Camp sewage treatment plants. The exceedances were attributed to faulty sewage treatment plants (both at the pilot camp and PAC) and following the detection of non-compliant discharges, Eni Ghana halted the discharge of treated wastewater to a soakaway and instead the effluent was collected by Eni Ghana's Waste Contractor for treatment in a municipal treatment works.

The IESC was informed that the malfunctioning STWs had been repaired and results for Q1 2022 indicate zero coliforms in the discharge. Measurements of total suspended solids, nitrogen, phosphorus and chemical oxygen demand remained slightly higher than the applicable project standards despite the repairs. Results for Q2 2022 were not available at the time of the site visit; once available the parameters exceeding project limits in Q1 2022 should be revisited and further investigations conducted if effluents from the PAC continue to exceed the applicable project standards and those of the Pilot Camp STP.

Offshore Cape Three Points**8.3.3 Groundwater monitoring**

The Project is abstracting groundwater via dedicated wells located north of the Pilot camp. Groundwater levels had been slightly depleting since the start of monitoring in 2017, however recent heavy rainfall appears to have recharged groundwater levels to earlier levels. Otherwise, the status of groundwater quality is unchanged since previous IESC monitoring reports and the IESC has not identified any project induced impacts/areas for concern.

8.4 Air quality**8.4.1 Ambient air quality**

The IESC has reviewed ambient air quality results since Q3 2021 through to Q2 2022 for the purposes of this reporting period. Samples analysed for NO₂, SO₂, PM₁₀ and total particulates were below Project standards on all occasions. Of note, SO₂ limits in neighbouring villages have frequently been exceeded in earlier monitoring reports with exceedances attributed to in-village combustion such as village fires for cooking and local vehicle movements. The reason for the apparent decrease in ambient SO₂ levels is not known²⁷.

8.4.2 Flaring

See GHG emissions, Section 8.6.

8.4.3 Stack Emissions

The IESC previously reported that stack emissions monitoring for the Main Power Generating (MPG) Units was not possible due to safety concerns and instead a Continuous Emission Monitoring System (CEMS) would be commissioned. Commissioning of the CEMS was scheduled to coincide with a shutdown at the ORF at the end of 2021. At the time of the recent site visit the IESC was informed that the CEMS had not yet been commissioned but some stack emission monitoring had taken place.

The IESC welcomes the stack monitoring campaigns and intention to commission a CEMS. The QMR and AMR template should be revised to accommodate reporting of stack emissions. Importantly, stack emission should be assessed against national and/or IFC stack emission standards for Thermal Power Plants²⁸. The actual limits depend on the thermal input, fuel type and design of the power units. For example, a gas-powered reciprocating engine should meet a 200mg/Nm³ limit for NO_x but other parameters such as SO₂ and particulates do not need to be monitored under IFC guidelines²⁹. This appears to be consistent with the monitoring results

²⁷ The increased use of more efficient cooking stoves may be contributing to the improved air quality.

²⁸ IFC EHS Guidelines for Thermal Power Plants, 2017.

²⁹ Emissions of SO₂ and particulates are low risk for combustion of low sulphur gas. The Project gas has a low sulphur content, thus unlikely to result in a deterioration of ambient air quality due to emission of particulates and SO₂.

Offshore Cape Three Points

summarised in the table below which show emissions are aligned with IFC guideline standards for NO_x (201mg/Nm³).

Parameter	Location	GS 1236:2018	IFC/WBG 2007
	Main Power Generator (MP3)		
SO ₂ (mg/Nm ³)	2.71	100	NG
NO _x (mg/Nm ³)	200.88	320	200
CO (mg/Nm ³)	960.96	100	NG
Temperature of flue gas (°C)	466	NG	NG

Figure 8.1. Main Power Generating units stack emission results, April 2022 (extract from Eni Presentation)

The CEMS is now due to be commissioned in early 2023. A second stack emissions monitoring campaign will be conducted in the period prior to commissioning of the CEMS. ESL has suggested that the high carbon monoxide levels (indicated in table above) are due to incomplete combustion of gas; this should be investigated and rectified such that emissions comply with national standards.

8.5 Noise

Noise measurements presented in the AMRs and QMRs for the accommodation camps have repeatedly been compared to industrial limits of 70dB(A) and it has therefore been concluded that measured noise levels that have exceeded 60dB(A) in Q1 2021 are therefore below applicable limits. The IESC has taken a different view and previously stated that residential limits of 55 dB(A) and 45dB(A) for day and night time respectively, or 3dB above background at the nearest receptor, would be more appropriate given the residential nature of the accommodation camps regardless of their location in an industrial setting. During the site visit, the IESC took the opportunity to stay in the PAC and can confirm there are no obvious noise sources (other than air conditioning units). Furthermore, the rooms are well insulated and external noise was not audible. The low noise levels in rooms is supported by an indoor noise survey³⁰ conducted by Eni Ghana in response to earlier IESC recommendations. The IESC further notes that noise levels recorded at the PAC during the night-time in Q1, 2022 where 40.9 dB(A), thus below IFC and Ghana limits for residential areas. It is not clear why there has been a significant decrease in the noise levels measured.

Noise levels measured at the Sanzule cemetery and the village of Anwolakrom exceed WBG/IFC night time limits. The noise is attributed to the noise from waves and vehicular movements. Having visited the sites, the IESC was unable to detect noise from the ORF/Eni Ghana activities during normal operations and therefore agrees with Eni Ghana's explanation for the apparent exceedances. The IESC also notes that noise levels are comparable with baseline noise levels and therefore considers the noise levels conform with IFC limits³¹.

There was however a noise related grievance raised in late May 2022 by the Chief of Anwolakrom. The Chief complained about sleep disrupting noise between the hours of 20.00 and 0300 hours. Eni Ghana attributed the high noise levels to malfunctioning silencers at the ORF. The silencers have been replaced and further silencers will be procured for back up purposes in the event of a subsequent silencer failure. Eni Ghana has reported that noise levels have

³⁰ The indoor noise monitored for Q1 2022 for the PAC were 35.3 and 33.7 dB(A) for day and night time respectively

³¹ IFC limits allow for up to 3dB incremental increase above background levels.

Offshore Cape Three Points

returned to those prior to the malfunction and the IESC can confirm there was no audible noise originating from the ORF in the proximity of Anwolakrom at the time of the visit (see also Section 6.8, Community and Worker Grievance Mechanisms).

8.5.1 Waste management

Eni Ghana retains the two waste management contractors³² (Zoil for most onshore wastes and ZEAL for waste generated on the FPSO) discussed in previous reports. Given the steady state nature of the Project, and the ongoing use of professional waste contractors, the IESC has no further findings relating to waste management.

The IESC did however make two visual observations during a walkover of the PAC as follows:

- An instance of poor segregation of waste at the ORF. Efforts should be made to ensure simply segregation of waste is adhered to and recommends refresher training where necessary. *Post visit note: Eni Ghana provide evidence of practical and classroom-based refresher training for contractors at the ORF prior to finalisation of this report.*
- Inappropriate storage of several litres of oil in an open bucket that was exposed to rainfall and located outside of any hazardous waste storage area. *Post visit note: Eni Ghana provided photographic evidence that the area has been cleared prior to finalisation of this report.*

An update on the status of earlier waste related findings is provided in Appendix 4.

8.6 Greenhouse gas emissions (GHG)

The IESC has previously described the two opportunities for Eni Ghana to significantly control and reduce GHG emissions: i) flaring and ii) fugitive emissions.

8.6.1 Flaring

The reporting of GHG emissions and the identification of areas for improvement and GHG emission reduction, is a requirement of the ESAP (Item 8). Eni Ghana has also 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.

In 2020, emissions were lower than in 2019, falling to 13.09 tCO₂/kboe (exceeding the target reduction). This was in part due to the COVID-19 related postponement of certain maintenance activities that would have resulted in shut down/flaring. However, in 2021 GHG emissions were expected to increase as these postponed activities were rescheduled. Such activities included, inter alia: acid stimulation of wells; FPSO shut down and replacement of compressor valves. In 2022, following the catch-up programme of maintenance activities, GHG emissions were expected to fall to a value more in line with pre COVID-19 levels.

The current forecast for 2022 GHG emission is significantly higher than previous years at 27.3 tCO₂eq/kboe (compared to 14.0 tCO₂eq/kboe in 2021). The increased forecast is a result of routine (planned) and non-routine (safety) flaring caused primarily by a change in reservoir behaviour that resulted in an unexpectedly high gas to oil ratio (GOR) such that there wasn't the capacity to reinject the associated oil; instead it had to be flared at the FPSO. A breakdown of activities resulting in the flaring is provided below. Two short/medium terms actions have been taken involving an increased gas reinjection capacity (May 2022) and sale of excess associated gas. Nevertheless, the excess flaring to date will impact total GHG emissions for the year.

³² IESC confirms both waste contractors have valid operating permits in place.

Offshore Cape Three Points

Reason for flaring	Description of events
Q1 2022 On the FPSO, flaring was from Associated Gas. Flaring was because of process upsets (increased GOR), and HP Compressor Train A restoration issues.	798.8 MMSCF of associated gas production (maintenance) 28.9 MMSCF was flared as a result of emergencies (safety); and 925.9 MMSCF as process flare. A total of 1753.6 MMSCF of gas was flared from 1st January to 31st March
Q2 2022 On the FPSO, flaring was from Associated Gas. Flaring was because of process upsets (increased GOR), GI Compressor strainer cleaning, GI Line leak repair and HP Gas Compressor issues.	90.35 MMSCF was flared as a result of maintenance activities 138.20 MMSCF was flared as a result of emergencies 368.76 MMSCF as process flare (increased GOR). A total of 597.31MMSCF of gas was flared from 1st April to 30th June

8.6.2 GHG reporting

Reporting of GHG emissions is performed in accordance with the Eni Ghana GHG accounting and Reduction Program (plan ms hse 021, October 2017). Eni Ghana collects data on scope 1, 2 and 3 emissions (although it generates its own power and therefore does not have scope 2 emissions). All GHG emissions are collated and calculated using an Eni bespoke software tool, SHERPA, as described in earlier IESC monitoring reports.

In accordance with WBG policy, all projects exceeded the 25,000t/a CO₂ eq, threshold should report scope 1 and 2 emissions on an annual basis³³. Eni Ghana's scope 1 (and 2) emissions are presented in its Annual Monitoring Report, however based on discussion during the site visit it is understood that emissions from support/supply vessels are not categorised as Scope 1 emissions and therefore are not captured in the annual reporting totals presented to the WBG.

The IESC is of the opinion that, where Eni Ghana has control over chartered vessels³⁴ involved in the transportation of goods and equipment to the FPSO, or providing other support/on standby at the Project site, should be categorised as scope 1 emissions. On the understanding that these emissions sources are already captured within SHERPA as scope 3 emissions, Eni Ghana should revisit its categorisation for vessel emissions (and other sources) and include them in the Scope 1 and 2 annual emissions reporting as appropriate.

8.6.3 Initiatives to reduce GHG

Notwithstanding the increased flaring reported above, Eni Ghana continues with a number of initiatives to reduce its GHG emissions.

³³ Eni Ghana reported 400,955 tCO₂ eq in 2021

³⁴ Eni Ghana would have 'control' where it has a vessel on a Time Charter agreement and is purchasing the vessel's fuel.

Offshore Cape Three Points

The IESC previously reported Eni Ghana undertook a survey of the ORF to identify gas leaks using an OGI (Optical Gas Imaging) thermal imaging camera in late 2020 which found no leaks allowing revision of the conservative leak estimates used for GHG emission calculations. A second sampling campaign was planned for Q3, 2021 to look at remaining potential emissions sources before extending to survey to include the FPSO. This campaign has now been completed with one leak being identified on the FPSO (based on 5208 potential FPSO emission sources) and no leaks identified during the finalisation of the ORF survey. The single leak was repaired on the day it was discovered.

An energy efficiency audit³⁵ was undertaken in Q3 2021. The audit concluded there were few areas for energy savings because the facilities are recently designed and built. However, two priority areas for improvement were identified, especially regarding offshore power generator optimization, and water injection optimization. Overall, the report shows a reasonable potential for reducing the Scope 1 CO₂ emissions by up to approximately 9% compared to current levels, subject to further technical and economic feasibility studies. It is currently unclear whether Eni Ghana has plans to undertake feasibility studies with the objective of reducing CO₂ emissions based on the opportunities identified in the energy audit.

Other initiatives recently implemented by Eni Ghana include:

- Use of bicycles at the ORF;
- Installation of photo-voltaic panels at the Bradley Tower, to power the building - completed;
- Elimination of diesel fuel for power generation at the ORF Pilot camp (ongoing), substituted with gas; and
- Replacement of light bulbs with energy efficient bulbs on the FPSO (ongoing).

³⁵ Energy Assessment - Eni Upstream OCTP/ORF Ghana, dated 16/09/2021.

Offshore Cape Three Points

Table 8-1: Summary of Findings, PS3

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
016_9/22	Oil sheen	A number of oil sheens originating from leaks at the OP7 Xmas tree have been detected since mid-2021. Temporary corrective actions have been used to stop ongoing leaks but a longer-term permanent solution, likely involving the replacement of the OP7 Xmas tree, is required.	PS3	The following actions should be taken by Eni Ghana: <ul style="list-style-type: none"> continue to closely monitor for oil releases. develop a road map/action plan for the permanent solution and report progress against the action plan to WBG and the IESC via existing communication mechanisms e.g. monthly operations reports and QMRs. Criteria for shutting down the well should be predetermined to avoid a prolonged decision-making process in the event of future release/increased severity. 	Potentially Moderate (depending on success of the temporary interventions) (Q1, 2023)
017_9/22	Offshore monitoring campaign	The survey report is currently in preparation the IESC will await its completion before reviewing in detail. In the interim a number of observations are made for consideration when finalising the report.	PS3	In the interim, the IESC makes the following comments: <ul style="list-style-type: none"> The influence of seasonality on survey results should be described in the report. Sample results from the recent survey should be compared with both 2017 and 2018 results and any baseline survey results were possible. Careful interpretation of the elevated As and Ba results in sediments, including toxicity on benthos and commentary on whether the same locations had been previously sampled in 2017/18. Lesson learned should be clearly described, for example, problems associated with laboratory analysis timescales that may have invalidated total coliform results. 	Low (during finalisation of survey report)
018_9/22	Effluent discharges	PAC – results for TSS, nitrogen, phosphorus and COD in Q1 2022 were above the applicable Project standards.	PS3	The effluent results in Q2 2022 should be carefully scrutinised and further investigations conducted if effluents from the PAC continue to exceed the applicable Project standards.	Minor (Jan 2023)

Offshore Cape Three Points

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
019_9/22	Stack emissions monitoring	ESL has suggested that the high carbon monoxide levels are due to incomplete combustion of gas.	PS3	High CO levels in the MPG stack emissions should be investigated and rectified such that emissions comply with national standards.	Minor (Q1 2023)
020_9/22	GHG emissions reporting	Eni Ghana does not categorise emissions from support and supply vessels associated with its offshore operations that are owned or controlled by Eni Ghana as Scope 1 emissions. Consequently, these emissions are not included in annual GHG emissions reporting to the WBG.	PS3	On the understanding that vessel emissions sources are already captured within SHERPA as scope 3 emissions, Eni Ghana should review its categorisation for Project vessel emissions and include them in the Scope 1 and 2 annual emissions reporting to the WBG as appropriate. Any change to the methodology used to report scope 1 and 2 emissions should be applied retrospectively to previous years to ensure like-for-like comparison with preceding years.	Minor (end Q1, 2023 to align with AMR)
021_9/22	Energy efficiency	An energy efficiency audit identified two priority areas of improvement related to i) offshore power generator optimization, and ii) water injection optimization. It is currently unclear whether Eni Ghana has plans to further explore the viability of these opportunities.	PS3	Eni Ghana to clarify its position with respect to the opportunities for GHG emissions reductions identified in the energy efficiency audit.	Minor (Q1 2023)

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

9.1 Introduction

In this section the IESC's analysis focuses on Security. Community Health and Safety will be a focus for the next IESC site visit. Topics presented in this section are:

- Security provision at the ORF and FPSO;
- Fishery-based incursions into the FPSO exclusion zone;
- Security related grievances; and
- Electricity connections to LRP options.

9.2 Security provision at the ORF and FPSO

The Security Management Plan (SMP) was finalised in November 2020 although was being implemented prior to this date. The SMP is reportedly updated periodically, as necessary, based on a quarterly Security Risk Assessment performed by Eni Ghana. It is also informed by National Security Risks Assessments undertaken periodically, and notably in November 2020, which are essential to Eni Ghana's understanding of the broader security context.

Security at all onshore Eni Ghana Project-related sites is provided by a single provider, G7, which has replaced the previous security provider, G4S. The IESC was informed that many of the security guards employed via G4S have transferred over to G7. G7 is subject to the same requirements as the previous security provider with respect to training and vetting of security personnel. Evidence of: i) Rules of engagement and use of force in the Security Providers Terms of Reference; and ii) training on the Voluntary Principles provided to G7 guards, has been provided and reviewed by the IESC.

The IESC does however note that G4S had a working agreement with the Police and the IESC had previously recommended the details of this agreement be made clear to Eni Ghana. Eni Ghana has since informed that a similar arrangement is in place insofar as the Ministry of Interior has put in place measures to ensure private security firms, such as G7, can call upon the Ghana Police if necessary. The arrangement is between the security provider and the Police, and Eni Ghana is not directly involved.

Whereas Eni Ghana does not have a direct agreement with the police, it should nevertheless work with the G7 to understand the circumstances under which Police support would be sought and the working arrangements between G7 and the police in the event of security threat. It is recommended that working arrangements should be tested via a security-based emergency exercise.

In addition to the security provider contracted by Eni Ghana, a permanent armed police presence was established by the Government at the ORF with 2 police personnel being present per 12-hour shift (4 per 24-hour period)³⁶. The police have signed-up to the Voluntary Principles on Security and Human Rights (VPs) and receive quarterly training (see previous IESC monitoring report) and it is understood that police join the G7 security team during morning briefings. The previously reported detachment of the military police based in the vicinity of the ORF remains in place along with the informal arrangement between Eni Ghana that enables the detachment to be called upon to assist security provision, as necessary.

³⁶ The permanent presence of armed police was prompted by a national security risk assessment which identified an enhanced threat from groups in the volta regions and Ivory Coast.

Offshore Cape Three Points

The IESC is aware of previous efforts made by Eni Ghana to formalise agreements with the military police/Ministry of Defence. It is recommended that Eni Ghana continues to use its best endeavours to reach a formal agreement; this might now be facilitated by reference to the MoU signed with the Navy which serves as a precedent. The MoU could be used to formalise command structures/interactions between Eni Ghana and the military police and rules of engagement, lead negotiating party etc. and must be compliant with PS4 requirements regarding deployment of government security personnel.

The latest version of the SMP available to the IESC is dated November 2020. In line with the SMP, which states revision and update at least annually and the IESC discussion with the Security Manager, the plan should be updated to reflect significant changes, including:

- change in the onshore security provider;
- status of MoUs with MoU appended to the SMP (see below); and
- the now redundant reference to security provision at the Tema/Takoradi metering stations.

9.2.1 Fishery-based incursions into the FPSO exclusion zone

The IESC has previously reported on the multiple incursions by fishing vessels into the Project's offshore safety exclusion zone and the risks posed both to Project assets and the fishermen from such incursions. Several initiatives to prevent incursions have also been reported, although with limited success (see successive previous reports).

It has always been Eni Ghana's intention to procure the services of the Ghana Navy to patrol the exclusion zone. In November 2021, Navy personnel were deployed to patrol the FPSO safety exclusion zone following agreement on a MoU between Eni Ghana and the Navy. The Navy has been patrolling in the GNS Blika and no incursions were reported in November 2021; this compares with 500 incursions in October prior to the Navy's presence. Incursions for 2022 year to date are zero. Two Eni Ghana representatives on board vessels provide reporting assurance and are able to report any incidents.

The IESC has expressed concern over the significant risks posed by fishing vessel incursions, both in terms of risks to fishermen and Eni Ghana assets, in preceding monitoring reports. The signing of an MoU and effectiveness of the permanent Naval presence in preventing incursions is a major success.

9.2.2 Security related grievances

During the site visit the IESC was informed by an Eni Ghana FLO (based on his discussions with fisherfolk) of a potential incident involving the Navy concerning the confiscation of a fishing net. Following further discussion with the Security Manager, details of the incident were unclear and it was suggested that the net was either recovered because of its drifting towards the FPSO, or that it might have been linked to another operator's offshore assets. In the absence of any evidence to link Eni Ghana to the incident, and on the basis that a report would have been produced in the event of an incident involving Eni Ghana's assets, no action is required. However, this does serve as a reminder that any incidents involving the Navy's interaction with fisherfolk or their nets should be clearly documented and investigated.

Reportedly there are no current (open) security related grievances. This was supported by IESC review of the grievance register.

9.3 Electricity connections to LRP options

In the May 2021 monitoring report, IESC noted concerns about the electrical connections installed as part of the LRP implementation, noting that the connections are installed on external

Offshore Cape Three Points

walls with minimal protective enclosures and exposed wires that are within easy reach community members including children. In response to this observation, Eni Ghana have provided records showing that they engaged with Electricity Company of Ghana (ECG) in November 2021, and undertook a field inspection with ECG and an electrical contractor. Based on this inspection, ECG confirmed that there were anomalies in the installations and provided recommendations for remedying them. A safety risk assessment conducted by ECG contractor with the support of Eni Ghana identified 35 structures for further corrective actions.

The ECG contractor then implemented corrective measures to all the 35 structures and a letter of completion was sent to Eni Ghana in May 2022. An Eni Ghana in-house engineer then inspected the corrective measures implemented by the ECG contractor as part of a two-day inspection exercise and confirmed that the inspecting and the corrective measures had successfully reduced the risk posed to the community.

IESC has not conducted any inspections or testing of the installations but is satisfied that the information provided from Eni Ghana indicate that the issue raised by IESC has been investigated and addressed by Eni Ghana in collaboration with ECG.

Offshore Cape Three Points**Table 9-1: Summary of Findings, PS4**

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
022_09/22	Onshore security management at ORF – military police	An informal arrangement exists between Eni Ghana with respect to the detachment of military police based in the vicinity of the ORF.	PS4	Eni Ghana should continue to implement its best endeavours to reach a formal agreement with the military police. The MoU with the Navy serves as a precedent and could be used as a template for any MoU with the military police.	Moderate (continuing)
023_09/22	Onshore security management at ORF	The new security provider (G7) can call upon the Ghana Police if necessary. The arrangement is between the security provider and the Police, and Eni Ghana is not directly involved.	PS4	Eni Ghana should work with the G7 to understand the circumstances under which Police support would be sought and the working arrangements between G7 and the police in the event of security threat. It is recommended that working arrangements should be tested via a security-based emergency exercise.	Minor (Q1, 2023)
024_29/22	Security Management Plan	The latest version of the SMP available to the IESC dated November 2020 includes content, in particular relating to the onshore security provider and status of MoUs, that has been superseded.	PS4	The SMP should be revise and reissued to reflect current security arrangements.	Minor (Q4, 2022)

10. PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

10.1 Introduction

The Project is currently working towards the completion of the support provided under the Livelihood Restoration Plan (LRP) for the land-based economic displacement. The Asset Compensation, Financial Management Training and Transitional Support Full Food Aid components of the LRP have been completed, with the Support Service component currently ongoing. Originally, the Support Services component had a duration of three years (February 2018 to January 2021) with the work being undertaken by TechnoServe as the delivery contractor. The main component of the 'Support Services' component is the selection, by eligible Project-Affected Persons (PAPs), of up to two income-generating options and the provision of facilities and starter packs of materials to enable the PAPs to generate revenue from their options.

The completion of the LRP has been delayed by the Project in order to provide additional support to those PAPs who had not been able to re-establish their livelihoods within the original planned timescales. The Project has communicated with WB and IFC on the delay in LRP completion through the Management of Change (MoC) process. The last MoC notification was provided to WB and IFC on 13 December 2021 and stated the requirement to delay completion to September 2022 due to "a delay in finalizing procurement processes for the extra support for targeted PAPs".

The PAPs that require additional support were identified by the LRP team together with TechnoServe and comprise 132 PAPs made up of "98 struggling beneficiaries who generated low revenues and 34 vulnerable PAPs who despite their best efforts in sustaining their livelihood options, were also impacted by the negative impact of COVID-19"³⁷.

The current implementation timeline for the additional support and completion of the LRP are stated by Eni Ghana as³⁸:

- June to September 2022: Due diligence on all selected participants, validation of proposed support, and procurement and distribution of additional support items.
- July to December 2022: Monitoring performance of participants after extra support distribution and mentoring and coaching of all project participants.
- November 2022 to June 2023: Project endline survey by TechnoServe, completion audit, project exit and close out.

10.2 Site visit to LRP recipients

During the site visit, IESC visited seven businesses run by PAPs who were recipients of support under the LRP. These businesses were a welder shop, a dressmaker, a milling and bakery operation, a cold storage operator, two poultry (egg) farms, and a combined pig and fish farm. The businesses that were visited were all operational and had generally been successful in establishing new sources of livelihood as a result of the LRP support. While the businesses that were visited are not a random or representative sample of LRP support recipients, they do demonstrate that the LRP support measures have been successfully applied by some of the PAPs. The LRP recipients that were visited described positively the support that they had received during the LRP implementation process, and there is evidence that long-term sustainability in these businesses has been achieved. For example, the poultry farmers described reinvestment

³⁷ Eni Ghana, July 2021. Livelihood Restoration Plan (LRP): Metric For Evaluating Restoration Of Livelihood For Project Affected Households.

³⁸ Presentation provided by SLC team as part of site visit, 22 September 2022.

Offshore Cape Three Points

and expansion of the flock size over time, and the dress-making business has a number of apprentices to help scale the business. Some of the businesses are affected by the current challenges in the broader economy and particularly by inflation in input costs (e.g. price of feed for the poultry farms). However, there was no indication from the businesses visited that the LRP support provided by the Project did not provide a reasonable foundation for them to develop a sustainable livelihood. IESC notes that the site visit included a limited number of PAPs, and the planned endline survey and completion audit will need to verify that the original and additional support measures have been adequate to support all PAPs to re-establish livelihoods, including those 132 PAPs that were identified for additional support (see also comments in Sections 10.4 and 10.5 below).

10.3 Meeting with LRP Working Group

During the site visit, IESC along with Eni Ghana representatives conducted a meeting with community members of the LRP Working Group. The meeting was used by the IESC to gather information about the role of the LRP Working Group and feedback on the LRP implementation process.

The community members of the LRP Working Group help to represent the PAPs living within the local communities, including youth and elders. They help with the 'on-the-ground' resolution of issues arising during LRP implementation, including helping to ensure that the right people get the right types of support and to identify and address any conflict or grievances. They serve a valuable role in helping to communicate to PAPs why some PAPs receive different types or level of support. They also encourage PAPs to make sustainable choices, with an example given of encouraging a PAP not to sell a solar panel for short-term gain as it was essential to their long-term livelihood. They meet regularly with Eni Ghana to provide feedback on LRP implementation.

The working group members provided the opinion that those who managed the LRP support packages well had seen good improvements to the livelihood activities, while those who had mismanaged the support provided to them now had challenges with income levels.

The working group members described how they support TechnoServe in helping to identify and resolve mismanagement of LRP support, and demonstrated a clear understanding of how community members can raise grievances if they have them. The working group members also described the context of current economic challenges that exist at the national level, including those related to COVID-19 and that these challenges had impacted the re-establishment of livelihoods.

IESC notes the valuable role that the LRP Working Group appears to have in supporting PAPs and in providing feedback to the LRP implementation process.

10.4 Metrics to monitor and evaluate the status of livelihood restoration

In the May 2021 monitoring report, IESC provided the following recommendations for refining the monitoring of the status of livelihood restoration:

- Expanding the metrics used to monitor and evaluate the status of livelihood restoration; ideally adding metrics that provide an indication that livelihood restoration, including aspects such as 'standard of living', is likely to be sustainable over time;
- Ensuring that comparisons of incomes pre- and post-LRP take account of inflation before reaching a conclusion that livelihoods have been restored/improved;
- Future Eni Ghana and TechnoServe reports to contain text that provides a justification for the approach of comparing revenues to incomes; and
- Average values should only be used when complemented by provision of more fine-grained information on specific groups.

Offshore Cape Three Points

In response to the first of these recommendations, the Project prepared a report titled '*Metric for Evaluating Restoration of Livelihood for Project Affected Households*' in July 2021. This defined a series of non-revenue 'proxy' metrics for which it was proposed that data would be collected from PAPs as a means of providing richer data on their financial and economic wellbeing. The five proxy measures proposed in this report are:

- Additional investments that PAPs have undertaken, for example building of houses (or buying of new property like cars), or business expansions (or setting up of new businesses, buying new equipment):
- Number of members in the household engaged in further education
- Number of employees in the household.
- Capacity building – determination of whether trainings were beneficial in their LRP operations and future activities.
- Health care proxies, whether the first point of call during ill health is either herbalist, drug store or clinic.

This report also defined a method for combining the data on the proxy metrics with the revenue data through a system of weighting, with 60% weighting assigned to revenue and 40% to the proxy metrics. The report does not describe how the raw data for revenue and proxy metrics would be standardised so that it could then be weighted, i.e. it is not clear how the mixed data for the metrics will be converted to a common scale against which the 60%:40% weighting scheme can be applied.

Eni Ghana produced a Proxies Survey Report in April 2022 that describes findings from a survey conducted to collect data from PAPs on the proxy metrics that are stated above. Surveys were administered for 200 of the 205 PAPs. The survey report describes its use as a "preliminary outlook on the livelihood restoration status of all the 205 HHs/ PAPs" and IESC assumes that updated data for the proxy metrics will be collected as part of endline surveys and / or the completion audit.

The Proxies Surveys Report categorises PAPs as having 'livelihood restored' if their weighted score is more than 70%. IESC notes that this is an arbitrary threshold, and there needs to be more transparency as to how revenue and proxy data have been standardised and weighted in order to support this choice of threshold.

IESC reviewed the spreadsheet used to derive the weighted scores and noted an issue that needs to be reviewed/resolved in order for this approach to be robust and transparent in determining if livelihoods have been restored. The assignment of the 60% weighting for revenues appears to be based on 60 points being assigned if revenues increased substantially, 55 points for a small revenue increase, and 40 points if the revenue decreased or had a small increase. IESC notes that a PAP with a substantial decrease in revenue would be assigned 40 points and that if combined with at least 30 points under the proxy metric rating they would pass the threshold of 70% and be categorised as "livelihood restored". IESC is concerned with this approach and recommends a review of the method.

Additionally, IESC reviewed the questionnaire used to collect data on the proxy metrics and notes that the questions on education and healthcare did not ask the respondent to attribute the education status and use of health care providers to the process or outcomes of the LRP. Despite this, the analysis and reporting on the proxy metrics implies that the provision of education and use of health care services is attributed to the LRP. Without being able to refer back to baseline data for these metrics or ask the respondent to state that they are directly attributable to the LRP, the analysis of proxy metric data needs to avoid attribution that may not be valid.

Offshore Cape Three Points**10.5 Completion audit**

A Livelihood Restoration Completion Audit was referenced in the presentation provided to IESC during the site visit as being scheduled prior to June 2023, but was also described by Project representatives as potentially being scheduled for the third quarter of 2023. Given that additional support measures are still being implemented for 132 PAPs, IESC considers that the third quarter of 2023 may be preferable in order to help capture the impacts of the additional support. IESC recommends that the schedule for the Completion Audit is clarified in a MoC notification.

IESC notes that the Completion Audit will need to consider the significant economic impacts to PAPs that have been caused by COVID-19 and the current high levels of inflation. These impacts will have negatively affected PAPs livelihoods, entirely outside of the impact created by the economic displacement caused by the Project. These economic challenges will have made it harder for the Project to restore livelihoods to baseline levels, particularly when inflation is taken into account. IESC recommends that the Completion Audit acknowledge the impact that these economic challenges will have had on livelihoods, and if livelihoods have not been restored due to these external factors that recommendations for any further support measures are made based on the Project's responsibilities in line with PS5.

10.6 Fisheries management

IESC met with community members who sit on the Fisheries Management Coordination Committee, with the meeting used to get feedback on issues of concern for the local fishing communities. The committee members described a positive working relationship with the Project, with good levels of engagement. If people from the local fishing communities have any issues then they raise them to the FMCC and the FMCC then raise them to Eni Ghana. The FMCC members reported positive support from the Project in relation to the school improvement project, the water supply system, and cooking stoves. They noted, however, a perception that the Project undertakes community support measures that they want to pursue rather than always directly addressing the community's requests for community improvements. They noted suggestions for the Project to provide credit facilities to provide equipment for fish smoking and fridges to allow the fishmongers from local communities to buy and store fish from other communities. They also noted the request for a road to be developed to the Bakanta community.

The FMCC do not represent the fisher-folk who fish in deeper water close to the FPSO and so were not aware of any issues associated with the exclusion zone around the FPSO or the activities of the Navy patrol in this area (see also Section 9.2.11).

The FMCC representatives referred to concerns about decreased fish catch, which is having an impact on livelihoods for the fishing community. They expressed an opinion that an increased growth of seaweeds may be caused by the Project, and suggested that local youth could be employed to clear and bury the weeds. They also referred to a concern that a rocky outcrop approximately 100m from the shore had appeared as a result of the Project's pipeline development and that the fisher-folk now had to avoid this area. IESC understands from Eni Ghana that this was investigated and found to be a rocky outcrop that was not caused by or related to the Project, and that the findings of this investigation were communicated to the FMCC.

IESC notes that the impact management related to fisheries is generally completed, with the original disturbance allowances fully paid, incursions into the FPSO area now dropped to zero (see Section 9.2.11), and there being no requirement for ongoing monitoring of fish catch or fishery-related activities. Ongoing engagement with the FMCC will remain valuable to hear issues of concern and to provide information. IESC understands that the Cumulative Impact Co-Management Platform may include fishing as one of its focus areas, and IESC is of the opinion that this would be appropriate given that while ongoing Project-related impacts may be limited

Offshore Cape Three Points

there is a requirement for any cumulative impacts from the oil and gas sector to be managed, particularly given pressures on the fishing industry from reported declining catch and potential impacts of climate change.

IESC understands that a further social support project is being planned in relation to fisheries. IESC notes the need for this to have clear objectives, to align with the needs of the local fishing communities, and for there to be a clear 'exit' strategy that allows the support project to be sustainable without ongoing Project support.

Offshore Cape Three Points

Table 10-1: Summary of Findings, PS5

ID	Aspect	Issue Description	Standard	IESC Recommendation	Significance (indicative date for completion)
025_09/22	Analysis of livelihood restoration status	IESC has identified potential issues with the analysis used to incorporate proxy metrics in the determination of whether livelihoods have been adequately restored.	PS5	Review the issues raised by IESC on the use of proxy metric data, weighting and thresholds, in determining whether livelihoods have been restored. Where necessary, revise the method and develop a short report that describes the method that is applied, and clarifies how this data and analysis will be used in any future endline reporting and the completion audit. This will need to be fully resolved in time for further endline reporting and the completion audit.	Moderate (completed prior to subsequent endline surveys and reporting)
026_09/22	LRP Completion Audit	IESC notes that the LRP Completion Audit will need to consider the significant economic impacts to PAPs that have been caused by COVID-19 and the current high levels of inflation. These impacts will have negatively affected PAPs livelihoods, entirely outside of the impact created by the economic displacement caused by the Project. These economic challenges will have made it harder for the Project to restore livelihoods to baseline levels, particularly when inflation is taken into account.	PS5	The Completion Audit should acknowledge the impact that these economic challenges will have had on livelihoods, and if livelihoods have not been restored due to these external factors, that recommendations for any further support measures are made based on the Project's responsibilities in line with PS5. IESC considers that a delay for the Completion Audit from the second quarter of 2023 may be preferable in order to help capture the impacts of the additional support measures. IESC recommends that the schedule for the Completion Audit is clarified in a MoC notification	Minor (in line with timing of Completion Audit)

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

11.1 Introduction

The IESC chaired a number of meetings relating to the management of biodiversity aspects in the reporting period (June 2021 to September 2022, unless otherwise indicated in the sections below) and involving the following parties in addition to Eni Ghana: ESL Consulting (ESL), Eni HQ³⁹. In addition, the site walkover included inspection of the ORF, the turtle hatcheries on the beach, plant nursery, reinstatement areas and areas previously noted to be at risk from erosion and drainage issues during the previous site walkovers to gauge progress.

This chapter presents the findings of the IESC monitoring in relation to biodiversity elements, including revisiting findings of the previous site visit and desk-based audit, with updates provided as appropriate. The chapter focuses on:

- Sea Turtle Biodiversity Action Plan (BAP);
- Avian BAP;
- Natural Habitat No Net Loss Implementation Plan (NNLIP);
- Vegetation reinstatement and recovery;
- Site drainage and erosion control; and
- Marine monitoring.

The status of previously identified issues is also reviewed in Appendix 4 and summarised below:

- 1) Verification of staff training including attendance lists and staff training records are not being provided in the QMR and AMR reporting, making it difficult to track training-related targets as stated in the Biodiversity Action Plans (BAPs) and material provided following an information request by the IESC appears to be outdated. Consequently, it has not been possible to verify if staff training material has been updated, as previously requested, to include specific information on key bird species of interest and Eni Ghana commitments relating to them in the Project Area of Influence.
- 2) The IESC previously questioned the timing/period covered in end of season monitoring reports. End of Season reporting for the 2021/22 period for sea turtles, shorebirds, vultures and forest birds has been made available for IESC review and is now more appropriately timed to facilitate reporting against BAP thresholds.
- 3) The IESC previously recommended a mechanism be put in place to prevent accidental introduction of AIS. No further importing of topsoil is planned therefore this is no longer a potential mechanism of Alien Invasive Species (AIS) introduction to the Project site. This issue is therefore closed (acknowledging that there are ongoing concerns relating to eradicating/controlling the spread of invasive species which have already established on site (see Section 11.6)).
- 4) The need to keep records relating to the scheduling of noisy works such as drilling to avoid sensitive periods for marine mammals remains ongoing, as does the need to conduct dedicated watches prior to noisy works.
- 5) An appropriate No Net Loss Implementation Plan for Natural Habitat, which was previously outstanding, is now in place.

³⁹ Eni HQ is supported by Flora and Fauna International

Offshore Cape Three Points**11.2 Sea Turtle BAP**

The Sea Turtle BAP has continued to be implemented throughout the reporting period, with details on specific aspects provided below. The full season of sea turtle observations for the reporting period is based on the BAP survey schedule and encompasses the period from August 2021 to February 2022.

11.2.1 Monitoring

Sea Turtle surveys were conducted by ESL's subcontractor Wildlife and Human Resources Organisation (WHRO) in accordance with the BAP schedule. Nesting activity by Olive Ridley and Green turtle was recorded, though with only Olive Ridley nesting in appreciable numbers. An increase in nesting activity was noted compared to previous periods, even accounting for differences in survey effort.

There continues to be no nesting activity in the high impact zone⁴⁰, though further assessment of this zone is planned to provide further detail on the reason for this. Broken Rank 3 lighting, which is considered the most harmful for turtles, has not been replaced, which is positive news.

As reported in the 2021 AMR report and End of Season Sea Turtle Report produced in April 2022, and as relayed in the sea turtle monitoring presentation to the IESC during the site visit, threats observed throughout the 2021/2022 monitoring period included poaching of turtles by community members, egg collection, light pollution, beach sand mining and fishery by-catch. A habitat assessment was also conducted along the nesting beach in November 2021, including an assessment of erosion, disturbance and pollution. The results of the assessment reported that plastic pollution remains a threat. Changes in beach slope remained constant, with periods of accretion and erosion, though increasing beach sand mining has the potential to result in the worsening of erosion.

The AMR and QMR reports state that no warning thresholds, as defined in the BAP⁴¹, were exceeded during the reporting period, which is supported by the evidence presented to the IESC for review during the site visit and by the results presented in the End of Season Sea Turtle Report.

11.2.2 Hatcheries and Back Beach Habitat

The three hatcheries remain in place in Eikwe, Krisan and Bakanta. The hatcheries have been successfully used during the reporting period and the IESC noted these to be in good condition during the monitoring visit (examples in Figure 11-1), following maintenance activity which occurred during the reporting period, photographs of which were provided during the presentation to the IESC. When asked by the IESC how many poaching attempts had been intercepted during the reporting period, ESL reported that four nests had been translocated to the hatchery due to poaching activity and one had been moved due to proximity to a road. Average hatching success and emergence success for the hatchery were good, if a little lower than the *in-situ* nests.

The nest which was translocated was moved due to its proximity to a road, which was upgraded by Eni Ghana (through the application of hard core to strengthen an existing vehicle route) to facilitate construction works for the community. The presence of this hard core when compared with natural sand along the back of the beach has effectively caused a reduction in back beach width. The existing sand compaction due to the repeated passing of vehicles is likely to have already been limiting its suitability for use by nesting turtles; though it is unclear the extent to which any increase in use, and by heavier vehicles, which has now been facilitated by the hard

⁴⁰ The area of beach 300m either side of the GES landfill

⁴¹ For example, if one of more turtle species is absent for 2 consecutive years, >20% poaching rate, <50% nesting success etc.

Offshore Cape Three Points

core application, is likely to affect nesting turtles. No consultation with the biodiversity team appears to have taken place prior to the application of the hard core and it is understood that there are no plans to remove it (though as acknowledged, vehicles were already using this area, as confirmed based on previous observations by the field survey team). The IESC recommends that a retrospective assessment of the likely effect of the road upgrade on the beach habitat and nesting turtles is undertaken, with additional mitigation identified and implemented if necessary. Elsewhere however there has been an increase in back beach width due to accretion and communities are planting coconut trees in this area, which is considered a benefit as turtles do prefer to nest near coconut trees.



Figure 11-1: Latest photographs of sea turtle hatcheries

11.2.3 Plastic Waste Recycling Initiative

The 2021 AMR reported that the plastic waste recycling initiative is ongoing, with over 2 tonnes of plastic waste now collected. The 2021 AMR reports that a sanitation awareness event took place as part of Eni Ghana's plastic waste management programme in August 2021, engaging 561 individuals across five communities. This event was aimed at improving sanitation within the communities and along nesting beaches. The plastic waste recycling initiative continued during 2022, as reported to the IESC during the site visit. The Q1 2022 QMR reported a complaint of irregular pickup of collected waste, resulting in a 'pile-up' in Sanzule, Bakanta, Eikwe and Krisan. This issue resulted from a reported fault with the dump truck (assumed to be a breakdown) which was not properly communicated by the contractor to Eni's Community Liaison Officers (CLOs); though this was resolved, with advice provided to the contractor to make any future delays known to the CLOs as promptly as possible.

11.2.4 Community Education and Awareness: Sea Turtles

ESL Consulting reported on the turtle related community awareness activities that they performed during the reporting period (June 2021 to September 2022), which engaged a total of 561 participants from five communities, which is well above the BAP target of 95 people per year. The effectiveness of the awareness programme is apparent, with improved community support for sea turtle conservation through community members reporting turtle poaching, some fishermen releasing captured turtles when they are accidentally caught and a reduction in refuse dumping along the beach. Although bycatch and poaching remain an ongoing issue, the incidence of poaching appears to be reducing, though this is also attributed to the increased coverage of the beach patrols, now utilising two teams per night.

Offshore Cape Three Points**11.3 Avian BAP**

The Avian BAP has continued to be implemented throughout the reporting period, with details on specific aspects provided below.

11.3.1 Shorebird Monitoring

Monthly shorebird monitoring continues to be implemented in accordance with the BAP schedule (peak season September to April; low season May to August) both at the beach transect at Sanzule and at the Amansuri Estuary, as outlined during the avifauna monitoring presentation to the IESC during the site visit, when graphs summarising the results for the reporting period were presented. An End of Season Shorebird Report was also submitted to the IESC for review and provides a suitable level detail and analysis of the results for the reporting period. The main threats to shorebirds in the area continue to be disturbance from fishermen, fishing and fishing-related activities, as outlined during the presentation to the IESC and reported in the 2021 AMR and End of Season report.

Counts were consistent with previous monitoring results with sanderling counts being the most numerous and peaking around October. Very few royal tern observations were made along the Sanzule transect in the Project AoI which was expected as the species has been noted to use this beach / transect area rarely. Royal tern was better represented at the Amansuri Estuary, though sanderling were also more abundant here, which is consistent with the results of previous surveys.

Counts at the Sanzule transect remain low compared to the 2015/16 baseline, though as previously acknowledged, the original baseline count could have been anomalous since it was a single data collection event. The BAP target for sanderling density has therefore been set as maintaining a higher average peak count density than the pre-landfall construction peak count (2017/18). Observed sanderling density for the reporting period is not quite meeting this BAP target (12.3/km), though there does now appear to be an upward trend since 2019/20 counts. When the BAP was finalised in 2020 it was noted that insufficient data was available for a warning threshold to be set, but that this would be developed on completion of the 20/21 monitoring period; however, this remains outstanding.

11.3.2 Additional Conservation Actions for Shorebirds

Relating to Additional Conservation Actions (ACA), it was reported that the large avian information board at the Amansuri Estuary was refurbished during the reporting period. In addition, during the previous monitoring visit, the IESC understood that Eni Ghana was planning further survey work via a collaboration between ESL and the Centre for African Wetlands (CAW) to build a more comprehensive understanding of bird movement in the region as a whole. During the current visit, however, it was reported that engagement with CAW has stalled; the cause appearing to be because CAW has ceased to be operating⁴². However, as reported in the 2021 AMR and during the IESC site visit, the Project team are now conducting comparative monitoring at the Ankobra estuary to collect contextual information to better understand the variation in bird numbers including factors such as seasonality, localised migration between sites and disturbance mainly from anthropogenic sources. The End of Season Shorebird Report contains the raw data from the observations at the Ankobra Estuary and a brief discussion of the results in comparison with those from Amansuri; however, the report acknowledges that a longer-term dataset is required in order to understand if the variability in sanderling and royal tern numbers at the primary survey area could be attributed to these species moving between the Amansuri and Ankobra estuaries. Going forward the IESC recommends that this activity be further explored as

⁴² Email communication from ESL.

Offshore Cape Three Points

a potential replacement ACA in place of the collaboration with CAW, and this continues to be reported and analysed in the End of Season reporting.

The 2021 AMR reported that in general, species diversity and abundance of shorebirds was higher at the Amansuri river estuary than the Ankobra estuary for all months surveyed, and that both trigger species for the Amansuri IBA (sanderling and royal tern) were encountered at both locations.

11.3.3 Hooded Vulture Monitoring

Hooded vulture surveys continue to be conducted in June and November in accordance with the schedule set out in the Avian BAP, though due to the scheduling of the IESC monitoring period the reporting period for vultures presented here covers the June and November 2021 monitoring window. An End of Season Vulture Report was provided to the IESC for review and a summary of the results was provided as part of the presentation to the IESC during the monitoring visit. During the 2021 reporting period there was an observed increase in vulture numbers across the overall area surveyed compared to the previous reporting period, despite recorded numbers for some individual locations being fewer than baseline and 2020 numbers. The greatest numbers of roosting and foraging vultures were recorded at Eikwe. None were recorded in Ngaleyki, where the species has historically been most abundant; however, this is attributed to the closure of a piggery which used to be present there. The 2021 AMR and End of Season reports state that most vultures utilised piggeries and refuse dumps as feeding areas and coconut trees as roosting habitats. Threats to vultures reported in the 2021 AMR and End of Season reports and outlined during the site visit presentation to the IESC include coastal development that results in the clearance of coconut plantations, which diminishes available roosting habitat. In keeping with the results of previous surveys, vulture abundance was noted to be higher in June than November. The 2021 AMR and End of Season reports state that the presence of some juvenile vultures suggests possible breeding in the area, but no nests were encountered during the surveys.

11.3.4 Community Awareness: Vultures

Community awareness campaigns against vulture persecution are reported in the 2021 AMR and appear to be having a positive effect. The enclosure of piggery areas during the birth of piglets to prevent the entry of scavenging vultures appears to be contributing to the prevention of persecution, however, some level of persecution is ongoing; including by children with slingshots, therefore it is understood that there will be a focus on this group in future awareness-raising.

11.3.5 Forest Bird Monitoring

Forest bird monitoring is ongoing in June (wet season) and December (dry season) in accordance with the Avian BAP, though due to the scheduling of the IESC monitoring period, the reporting period for forest birds presented here covers the June and December 2021 monitoring window. An End of Season Forest Bird Report was provided to the IESC for review and a summary of the results was provided as part of the presentation to the IESC during the monitoring visit. During the monitoring period both total counts and species numbers recorded were higher in December than June, which is consistent with results from previous years. The 2021 AMR and site visit presentation to the IESC report that breeding activity was recorded only for weaver species (village weaver and Vieillot's black weaver) and that threats to forest birds include habitat modification and human disturbance. The AMR also reports that the forest birds in the area appear to have acclimatised to the presence of the ORF, with some birds recorded roosting on the facility and the forest areas around the ORF continuing to offer potential habitat for birds.

Overall, 79 species were recorded across both seasons, which is similar to the previous year when 82 were recorded. No species of conservation importance were reported, though previous

Offshore Cape Three Points

records of species of conservation concern have been at very low numbers (three non-breeding individuals of the Near Threatened copper-tailed starling). One of the objectives of the No Net Loss Implementation Plan (see Section 11.5) is to improve habitat for priority species of forest birds, with a target of observing one or more priority species during annual monitoring, therefore it is hoped that this target can be met once the enhancement actions set out in the NNLIP are implemented.

11.3.6 Community Awareness: Forest Birds

Habitat improvements for forest birds including signage within the concession were reported in the presentation given by ESL during the IESC monitoring visit. Further community awareness raising as part of Natural Habitat NNLIP (see Section 11.5) will also be relevant to forest birds.

11.4 Staff Training

There is no indication in the AMR/QMR or other reporting that biodiversity training has taken place as part of staff inductions; however, it is understood from the 2022 Q1 QMR that marine mammal training was conducted for personnel on the Energy Empress Vessel for the Offshore Environmental Monitoring Campaign, though no full training transcript or correctly dated attendance sheet was provided to verify this. Training transcripts and attendance sheets were included in the information request submitted by Ramboll to Eni Ghana; however, attendance sheets provided in response to the request appeared to be from marine mammal and sea turtle identification training dated 15/06/2016. On questioning this, it became clear that this was due to an error in the preparation of the attendance sheet, whereby the date of an old training session had accidentally been retained on the template.

No training is reported in the AMR/QMR or other reports relating to the training of local community members involved in beach patrols, though the required frequency of this as stated in the Training Requirements section of the Sea Turtle BAP is that this be conducted on a seasonal basis. This was recognised as a recommendation in the presentation provided by ESL to the IESC and should be taking place in accordance with the schedule stated in the BAP.

The IESC recommends that in future full transcripts and attendance records are kept for each training session held, with the correct date of the training session clearly shown on both the transcript and the attendance sheets, and that these are clearly reported in the AMR and QMRs and provided to the IESC for review.

11.5 Natural Habitat No Net Loss Implementation Plan (NNLIP)

As reported in the Q1 2022 QMR, the Natural Habitat NNL Implementation Plan (NNLIP) has been finalised. A PowerPoint update on the NNLIP, prepared by Eni Ghana and Eni HQ was presented to the IESC during the monitoring visit. The final NNLIP was also provided to the IESC for review and appears fit for purpose. It has also been reviewed by WBG and confirmed to align with PS6 requirements (prior to IESC review) and is the early stages of implementation.

Appropriate consultation with both internal and external stakeholders has informed the NNLIP, which is centred on the creation of three management areas within the concession, each with their own Key Performance Indicators (KPIs). These are:

- A **Revegetation Zone** (12.3 ha) – with a predicted gain in habitat over 20 years of approximately 9.8 Quality Hectares (Qha);
- An **Enhancement Zone** (22.1 ha) - with a predicted gain in habitat over 20 years of approximately 17.2 Qha; and
- A **Protection Zone** (29 ha) - with a predicted gain in habitat over 20 years of approximately 5.8 Qha.

Offshore Cape Three Points

Although the total revegetation area of 12.3 ha by 2040 is predicted to provide the equivalent of 9.8 Qha of natural habitat, suggesting that restoration alone will compensate for losses (8.4Qha), some additional offset is planned to account for indirect impacts that are difficult to assess, the time-lag between loss and gain, and uncertainty in the speed at which restoration will take place.

A key element of the planned activity within the Enhancement Zone will be to conduct a feasibility trial of artificial nest provision for birds, including ground nesting habitat and nesting boxes for resident forest bird species which currently have limited access to the natural tree cavities provided by older trees. Forest bird diversity is being used as a measure of habitat quality. This activity is a targeted means of increasing nesting opportunities for forest-dependent species.

The Q2 2022 QMR reported a kick-off meeting on this Artificial Nest Provision (ANP) with the contractor Envaserv and field reconnaissance by this contractor for suitable locations for nest box installation has taken place. The identification of local carpenters who can construct bird nesting boxes and assist in their installation is currently in progress. It was explained during the monitoring visit that this trial will be the first of its kind in Africa (although boxes have been used for targeted species (e.g. ground hornbill) in natural settings and for owls in palm plantations previously, as far as Eni Ghana are aware, this is first such attempt for passerines in natural settings) and there is an intention to share the results with the wider scientific community. Eni Ghana have also shared a case study on the Project BAP (including the restoration component) with IPIECA (the global oil and gas association for advancing environmental and social performance across the energy transition) which will be published in an update to IPIECA's BAP Guidance document.

Broad monitoring and evaluation objectives and methods have been set to track the progress of the NNLIP, with appropriate warning and exceedance thresholds to be tracked over time to indicate when adaptive management is required. Some changes to the monitoring regimes are likely to be necessary as the evaluation process proceeds and it becomes clear what does and does not work. As explained to the IESC during the monitoring visit, the scope of work for the monitoring of the NNLIP will therefore be subject to review by Eni HQ.

The NNLIP also sets out Additional Conservation Actions (ACAs) to achieve qualitative gains for biodiversity, the principal action being the Rural Clean Cooking Project, which is a joint multi-phase project between Eni Ghana and WBG to distribute and promote the use of clean cook stoves in order to reduce fuel wood consumption that would otherwise have affected native forest areas within the Amansuri region. The IESC understands that the implementation, monitoring and evaluation of this project will be guided by a separate implementation plan.

The 2022 Q2 QMR indicated that the budget for the NNLIP has been shared with WBG; however, it is understood from conversations held during the monitoring visit that a long-term budget forecast (10-20 years) remains outstanding.

11.5.1 Community Awareness: NNLIP

The 2021 AMR reports stakeholder engagement on the NNLIP in October 2021, involving the chiefs and elders of Sanzule and Bakanta Traditional Authorities. This engagement aimed to highlight the role of the community in the successful implementation of the NNLIP with an emphasis on continuous community awareness and education and the importance of the signage at the ORF.

11.6 Vegetation Reinstatement and Alien Invasive Species

The 2021 AMR reported that following documents were reviewed to align with the NNLIP and signed by IFC:

Offshore Cape Three Points

- Flora Conservation Plan;
- Reinstatement and Revegetation Standard; and
- Prevention and Control of Alien Invasive Species (AIS) standard.

Revegetation and AIS management remain ongoing activities. A total of 15,506 assorted seedlings of indigenous plant species are reported to have been planted over an area of approximately 9.72 ha, including maintenance planting. This has depleted the nursery stock; however, collection of seeds and seedlings of the species of relevance to the revegetation activity is ongoing to replenish this supply, from reference vegetation in the concession. Quarterly monitoring is ongoing. The cover crop *Pueraria phaseoloides* is being planted as a cover crop in the revegetation plots to help restore soil fertility and suppress the growth of noxious weeds (e.g. Photo 11 of Photolog, Appendix 5). Revegetation to date appears largely successful, as observed during the monitoring visit, though a few isolated bare patches requiring further remediation remain (e.g. Photo 12 of Photolog, Appendix 5), as does some legacy plastic sheeting which requires removal (e.g. Photo 9 and 10 of Photolog, Appendix 5).

The IESC noted during the site visit that fencing intended to protect newly planted coconuts was in need of repair, though this issue was addressed and closed out immediately following the site visit, with photographic evidence provided by Eni.

The same four invasive species as noted during previous monitoring visits continue to be encountered on the Project site and manual eradication methods are working well for two of these species (*Chromolaena odorata* and *Leucaena leucocephala*). *Imperata cylindrica*, which, as noted during the previous monitoring visit, was introduced to the site via imported topsoil, continues to be problematic at the CONSAR laydown, Temporary Construction Facilities and frontage of the office accommodation despite manual removal and incineration, and the option to control this species and prevent its further spread through the application of the herbicide glyphosate is being pursued. Eni Ghana confirmed that no further importing of topsoil has taken place or is planned. Although *Croton hirtus* is the most widespread, its relative lack of vigour means that it is readily controlled through revegetation and natural thicket regeneration, since it performs poorly and dies back under shade. The widespread nature of its occurrence on path edges and open areas outside thickets, however, means that glyphosate is also an option which is being pursued for this species.

11.7 Site Drainage and Erosion Control

In previous monitoring visits, the IESC expressed a concern over the positioning of culverts (short pipe sections) beneath the access road close to the tie-in with the GNGC pipeline, as these were considered to be positioned too high to maintain hydrological connectivity when swamp water level falls in the dry season. Ongoing monitoring by ESL has not, however, indicated any deleterious effect on the adjacent swamp habitat, possibly as a result of the porosity of the road itself allowing free movement of water even when the water level is below that of the pipes. The hydrological balance therefore appears to be being maintained and there is no evidence for continued concern on this matter.

Following the previous monitoring visit, it was understood that ongoing erosion control measures were planned to address areas with continued high sedimentation on site. No concerns relating to erosion were noted by the IESC during the current monitoring visit and previous areas of erosion appear to have been successfully remediated as indicated as verified during the site visit inspection (e.g. Photo 2, Appendix 5).

Offshore Cape Three Points**11.8 Marine Monitoring**

As indicated in Section 11.4, it is understood from the 2022 Q1 QMR that marine mammal training was conducted for personnel on Energy Empress Vessel for the Offshore Environmental Monitoring Campaign, though no training transcript or attendance sheet was provided to verify this.

It is understood that no additional noise-generating operations (e.g. drilling) were conducted in the reporting period as no results of dedicated marine mammal watches have been reported for the monitoring period.

No incidental sightings of marine mammals or sea turtles during offshore operations are reported in the AMR or QMR reporting; however, it is understood from Eni Ghana that some incidental sightings did occur. The incidental sighting record sheets and photographs provided as part of the documentation however relate to sightings made in 2020; therefore it has not been possible to verify the 2021/2022 records. In addition, turtle bycatch by fishermen is reported to remain an ongoing issue.

Elevated levels of barium, lead and arsenic were noted during the monitoring of sediment and water quality around the FPSO. It is therefore recommended that the experts that conducted the survey, flag any recommendations for further monitoring of marine biota, e.g., given the bioaccumulation of metals in the food chain it may be worth acquiring some of the catch from local fishermen to test fish tissue for the metals that appear to be present at increasing concentrations around the FPSO.

Offshore Cape Three Points

Table 11-1: Summary of Findings, PS6

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
027_09/22	Communication between Biodiversity and Social Teams and impact assessment of the beach road works on sea turtle nesting habitat.	<p>Laterite has been used to upgrade the beach road to Bakanta. It is understood from ESL's turtle expert this was potential nesting habitat for turtles and that the biodiversity team was not made aware of plans to upgrade the road. The level of impact is unclear but nevertheless:</p> <ul style="list-style-type: none"> • The Biodiversity/ESL turtle specialist should have been consulted prior to road upgrade. • In general, better processes (outside of MoC) to ensure liaison between SLC and Biodiversity teams is required where their goals overlap. • Retrospective assessment of impact is required and confirmation required that measures in Turtle BAP are sufficient to ensure NNL/NG. 	PS6	<p>Better communication is required between the biodiversity and social teams, for example through regular meetings between the functions so that each is aware of the other's planned activities. This is also recommended because community engagement activities are a significant aspect of the Biodiversity Action Plans and No Net Loss Implementation Plan. This communication will need to be ongoing and verifiable, e.g. through meeting notes included in the QMRs.</p> <p>Retrospective assessment of the level of impact and confirmation that the Bakanta road upgrade works have not compromised the Sea Turtle BAP. Should a significant residual effect be identified as a result of this assessment, suitable mitigation/ compensation will need to be implemented, with evidence provided in the QMR/ AMR reporting.</p>	Moderate (Q4, 2022)
028_09/22	BAP warning threshold for sanderling density	When the BAP was finalised in 2020 it was noted that insufficient data was available for a warning threshold to be set for sanderling density, but that this would be developed on completion of the 2020/21 monitoring period; however, this remains outstanding.	PS6	Based on the combined latest dataset for sanderling, develop a BAP warning threshold for sanderling density. Whilst it is appreciated that Eni Ghana have limited ability to intervene to increase population numbers if declines are occurring elsewhere along the migration route, the development of a warning	Minor (Q4, 2022)

Offshore Cape Three Points

				threshold was a commitment of the BAP which remains outstanding.	
029_ 09/22	Alternative shorebird ACA; Data requests and sharing	There is a need to identify an alternative Additional Conservation Action to replace the intended collaboration with CAW now that their shorebird study has finished, e.g. formalising the contextual data collection by the field survey team at the Ankobra estuary. It is understood that no Project biodiversity data has yet been shared with the wider scientific community to improve regional conservation efforts.	PS6	Identify an alternative Additional Conservation Action to replace the intended collaboration with CAW, such as the continued data collection at the Ankobra estuary, and implement this through the Avian BAP. Since their shorebird study has finished, request any relevant contextual shorebird data from CAW to better inform the Project's analysis of shorebird numbers and influencing factors. This should include monitoring data for the shorebirds themselves and prey density data, to inform interpretation of Project survey results. Share Project-related biodiversity data with the wider scientific community, including the Global Biodiversity Information Facility.	Minor (Q4, 2022)
030_ 09/22	AIS	It is understood that there is an intention to pursue herbicide application to control problematic invasive species on-site however, this alone is unlikely to resolve the issue and should be combined with the continuation of manual measures that have been effective to date.	PS6	Consult expert sources such as the Global Invasive Species database regarding optimal control of <i>Imperata cylindrica</i> , potentially proceeding with multiple integrated techniques.	Minor (Q4, 2022)
031_ 09/22	Long-term budget for>NNLIP	A long-term budget forecast (10-20 years) for the>NNLIP has specifically been requested by WBG/IFC.	PS6	Eni Ghana to provide a long-term budget forecast for the implementation of the>NNLIP	Minor (Q4, 2022)
032_ 09/22	Bioaccumulation of metals	Elevated water and sediment metal concentrations have been reported in areas around the FPSO, therefore the potential for these to bioaccumulate in the food chain should be considered by the experts in their reporting and recommendations. For example,	PS3/PS6	Environmental reporting to include recommendations for further monitoring including consideration of testing for bioaccumulation, followed by evaluation and implementation by Eni as deemed necessary.	Minor (Q4, 2022)

Offshore Cape Three Points

		is testing of fish tissue samples from local fishermen justified?			
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Offshore Cape Three Points

12. PERFORMANCE STANDARD 8: CULTURAL HERITAGE

During discussions on the LDPj-CIS initiative as part of the May 2021 VSV, the IESC was informed that as a component of actions to complete the educational project's infrastructure component (see Section 6.4.2), work will be done to construct the fence at the Royal Cemetery. In April 2022 pacification rites were performed at the Royal Cemetery, prior to the construction of the fence wall around the cemetery.

With no other activities undertaken in relation to cultural heritage, IESC has no other observations in relation to PS8.

APPENDIX 1

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Updated ESAP - 01 February 2018 to replace the version updated 16 June 2017. IESC NOTE: Status change items of note are highlighted in yellow.

	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 - Complete Note. This indicator of completion will be applicable to any future drilling for the Project .
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	a) Terms of reference of the time sensitive surveys (birds and sea turtles) submitted to WBG by end of October 2015	a) 10/31/2015 - Complete b) 06/30/2016 - Complete

	Task	Indicator of Completion	Timeframe
	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.	b) Pre-construction surveys and monitoring plans submitted to WBG.	
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
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 - 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	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 - completed e) Based on LRP f) 03/31/2019 – Complete g) Finalization report: at the completion of the LRP (remains pending)

	Task	Indicator of Completion	Timeframe
		<p>f) Interim Implementation Audit carried out by an external competent resettlement professional and report submitted to WBG</p> <p>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</p>	Completion audit: One year after the completion of the implementation of the LRP (remains pending)
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 will also include a compensation framework in line with PS 5 in case fishers are adversely impacted by an oil spill.	<p>a) FMP strategy submitted to WBG.</p> <p>b) FMP submitted to WBG.</p> <p>c) Evidences of implementation of the FMP and participatory monitoring program included in the Annual Monitoring Report.</p>	<p>a) 12/31/2016 Complete</p> <p>b) 5/31/2017 or 2 months prior to construction sea pipeline whichever comes first - Complete</p> <p>c) 12/31/2017 Complete</p>
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.	<p>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</p> <p>b) BAPs for sea turtles and for birds submitted to WBG</p> <p>c) Evidences of implementation of the BMP / BAPs included in the Annual Monitoring Report.</p>	<p>a) 07/31/2016 - Complete</p> <p>b) 11/30/2016 - Complete</p> <p>c) 12/31/2017 - confirmed</p>
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.	<p>a) Community investment strategy submitted to WBG</p> <p>b) Final Community Investment Strategy submitted to WBG</p> <p>c) Updates and evidences of implementation of the strategy included in the Monthly E&S Reports and Annual Monitoring Report.</p>	<p>a) 12/31/2015 - Complete</p> <p>b) 10/31/2017 - Complete</p> <p>c) 12/31/2018 - Ongoing</p>
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	<p>a) IESC's Terms of Reference submitted and approved by the WBG, and IESC hired</p> <p>b) First monitoring visit and report submitted.</p>	<p>a) 12/31/2016 - Complete</p> <p>b) 03/31/2017 - Complete</p>

	Task	Indicator of Completion	Timeframe
	drilling and annually during production operations. The reports of the IESC will be published.		
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

PROJECT DOCUMENTATION PROVIDED FOR REVIEW

Document Title	Reference/Company	Issue/Effective Date
Notification of sheen in a letter dated 14 February 2022 from Eni Ghana to WBG.	Eni Ghana	14/02/2022
Consolidated Tracking Register (extract)	Eni Ghana	NA (updated continuously)
Onshore Environmental Quarterly Monitoring Report, Quarter 2.	ESL Consulting	August 2022
Emergency Exercise Report – Oil spill FPSO KAK	Eni Ghana	26/11/21
Permit Status (Register)	Eni Ghana	NA (updated continuously)
2022 HSE Audit Program. Doc ref. pro ms hse 010 eni ghana r10	Eni Ghana	January 2022
Land Transport & Lifting Contractor Audit, Baj Freight & Logistics Limited. Audit Report Doc, ref rep-ms-hse-153 eni ghana-r00	Eni Ghana	11/5/2022
WBG VSV Audit Actions May 2021 (spreadsheet tracker)	Eni Ghana	19/08/2022
Emergency drills 4Y plan, Annex L Doc ref. pln ms hse 002 eni ghana r17	Eni Ghana	
Stack emissions monitoring report.	ESL	13/01/2021
Energy Assessment, Eni Upstream – OCTP/ORF – Ghana Doc ref. TAEF-ENEF-ENPL-EA-o18-07-21	Eni	16/09/2021
ISO 14001 and ISO 45001 certificates	RINA	29/12/2020 (Issue date)
HSE Training Plan, 2021	Eni Ghana	January 2021
HSE Audit Report, Zoil Services Limited Doc Ref. rep ms hse 127 eni ghana -HSE Audit	Eni Ghana	29/04/2021
LRP Proxies Survey Report and appendices	Eni Ghana	April 2022
April 2022 Influx Management Household Survey Report	Eni Ghana	April 2022
Eni Management System Guideline: Internal control and risk management system Annex E - Eni against violence and harassment in the workplace	Eni Ghana	21 December 2021
ESAP Monitoring and Evaluation Report – SPIE December 2021	Eni Ghana	13 March 2021
Photograph of grievance box at ORF	Eni Ghana	18 October 2022
List of PAPs eligible for extra support	Eni Ghana	Undated
Preliminary PP Eligibility Criteria for Validation - EDGE Program	Eni Ghana	Undated
ORF Resident / Visitors Booklet	Eni Ghana	October 2022
SUST-PLAN-003 Workers Management Plan - Production	Eni Ghana	December 2018

Document Title	Reference/Company	Issue/Effective Date
Sea Turtle training transcript	WHRO	None given
Sea Turtle Monitoring End of Season Report	Eni	30 May 2022
End of Season Report Shorebirds 2021-2022	Eni	05 June 2022
End of Season Report Vulture Survey 2021	Eni	05 June 2022
End of Season Report Forest Birds 2021	Eni	05 June 2022
Screengrab of training on bird identification at ORF	Eni	09 September 2022

In addition to the documented listed above, reference was made to the suite of existing production phase E&S management plans and Annual/Quarterly Monitoring Reports produced by Eni Ghana and attachments therein. Information used in this report was also taken from a number of presentations given by Eni Ghana and its consultants during the visit.

APPENDIX 3

MONITORING VISIT ITINERARY

Friday 16th September 2022

	HSE Team	Social Team
14.30 - 17.30	<p>Opening Meeting (remote)</p> <ul style="list-style-type: none"> • Introductions • Scope of VSV and logistics <p>Eni to present project status update including:</p> <ul style="list-style-type: none"> • Onshore - Main facilities • FPSO upgrade/Drilling activities/well conversions (in late 2021/proposed for 2022) <p>HSE and SLC organograms</p> <ul style="list-style-type: none"> • Roles and responsibilities • Contractors <p>Management of cumulative impacts</p>	<p>12.30. Social team to meet with Eni HR representative</p> <p>See HSE column</p>

Monday 19th September 2022

	HSE and Biodiversity	Social
am	<p>Site walk over (ORF facilities)</p> <ul style="list-style-type: none"> • Permanent accommodation facility • Beach area (landfall) • Reinstatement areas • Former contractors workshop area • Sewage treatment plants • RoW reinstatement • Nursery • Site drainage/outfalls • Former topsoil stockpiles • HAZMAT facilities 	<p>Site walkover of the ORF facilities (jointly with HSE for first part)</p> <p>Walk-through of the permanent accommodation camp.</p> <p>30 min interview with a sample of workers</p> <p>Meetings with sample of workers before leaving</p>
pm	<p>Discussions with ESL and Eni Ghana on environmental monitoring (scope, plans, monitoring activities, results)</p> <ul style="list-style-type: none"> • Invasive species • Reinstatement and soil erosion • Swamp water levels/effectiveness of culverts 	<p>Visits to see ongoing livelihood restoration projects/sample of the Income Generating Activities/CIS projects</p> <p>Visit to potable water network (especially recently expanded components)</p>

Tuesday 20th September 2022

	HSE & biodiversity ⁴³	Social
08.30-10.30	<p>Waste management (discussion and review of paperwork on site)</p> <p>Offshore monitoring campaign for 2021 (or 2022)</p> <p>Areas used to achieve as NNL office based NNL discussions (programme/progress)</p>	<p>Influx Management:</p> <ul style="list-style-type: none"> Discussions; and Drive through of areas closest to ORF, to be accompanied by CLO, to discuss recent changes and observe for indicators of influx. Areas subject to farm encroachment
10.30-12.00	<p>Environmental Monitoring (onshore)</p> <ul style="list-style-type: none"> air (including stack emissions monitoring) surface water groundwater treated effluents, including STP noise and vibration <p>(Session to include ESL)</p> <p>ESL to participate in biodiversity talks</p> <p>Option to go back on site for inspections.</p>	<p>Fishery Management Plan Delivery Officer:</p> <ul style="list-style-type: none"> Fisheries issues Current/future challenges Incursions into exclusion zones <p>Update on fish catch monitoring</p> <p>Meet with local representatives of the Fisheries Management Coordination Committee (in Sanzule)</p>
	Lunch break	Lunch break
13.00 - 14.30	<p>Discussions with ESL and Eni Ghana on biodiversity</p> <ul style="list-style-type: none"> Bird monitoring Turtle monitoring Marnie mammals <p>Marine mammal and sea turtle encounters reported as part of MMSTPP</p>	<p>Meet with [local representatives of] the Livelihood Restoration Working Group:</p> <ul style="list-style-type: none"> Livelihood Restoration to date: <ul style="list-style-type: none"> Successes/difficulties Future actions considered necessary
14.30 - 16.30	<p>Continuation of site inspection</p> <ul style="list-style-type: none"> Visit Turtle hatchery Visit to nearby waste contractor facilities (time permitting) 	<p>Further visits to see ongoing livelihood restoration projects/sample of the Income Generating Activities/CIS projects</p>

Wednesday 21st (a public holiday in Ghana)

	HSE Team	Social Team
	<p>Travel to Accra</p> <p>Initial findings - briefing meeting with all parties</p>	<p>Travel to Accra</p> <p>Initial findings - briefing meeting with all parties</p>

⁴³ Ramboll biodiversity specialist will join biodiversity meetings remotely.

Thursday 22nd (Accra office)

	HSE Team	Social Team
08.00 – 10.30	<p>HSE statistics/performance (2021 to date)</p> <p>Internal audit programme/ audit findings</p> <p>Training</p> <p>New HSE initiatives</p>	<p>Community grievance management data:</p> <ul style="list-style-type: none"> • Eni Ghana and Contractors • Discussion on current status of grievances (review of grievance register) • Average time to close grievances (2020) <p>Operations Phase SEP:</p> <ul style="list-style-type: none"> • Discussion on recent engagement activities (review engagement register) • Themes/Issues/challenges identified during recent engagement.
10.30 - 12.00	<p>Security Management</p> <ul style="list-style-type: none"> • Fishing boat incursions, • MOUs (signed & naval support Q4 '21) • Status of agreements with security providers (including police deployment) • Discussion on any recorded security incidents • Status of use of force and human rights training for security personnel (review of training records) • SMP status etc. <p>Contractor compliance with SMP</p>	<p>Mtg with Community Labor Relations Officer:</p> <ul style="list-style-type: none"> • Discussion on current status of grievances (review of grievance register) • Legacy demobilization issues • Discussion on COVID-19 management for workers, including current status of cases and restrictions. <p>Demobilized DAoI workers and integration into rural economy (status update)</p>
13.00 - 15.00 (30 mins per session)	<p>MoC</p> <ul style="list-style-type: none"> - register of changes - GI-3 conversion <p>GHG emissions</p> <ul style="list-style-type: none"> - Breakdown of emissions - Initiatives to reduce GHG emissions <p>Emergency Response planning/drills/incidents</p> <p>Permitting status update</p>	<p>LR Programme: Status (Session 1) following up on observations/info provided during site visit</p> <ul style="list-style-type: none"> • Update on livelihood restoration management • Update on the status of the 'Livelihood Restoration Plan (LRP) Completion Strategy/extended dates • Status of the transfer of the Community Water Supply Project • Status of the Education project(s) • Status of the LDPj-CIS projects (Rural Clean Cooking Project, Building Businesses, and livelihoods project) • Access to energy initiative
15.30 – 17.30	Close out Meeting	

APPENDIX 4

STATUS OF ISSUES IDENTIFIED IN PREVIOUS MONITORING VISITS

This Appendix presents previously unclosed 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. Issues identified prior to the September 2022 site visit

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
001_ 5/21	Permits	The renewal of certain permits is outstanding. These include the permit from the GMA for the establishment of offshore exclusion zones and a production permit (oil phase and gas phase) from the PC.	PS1	Although this is not having an impact of operations, Eni Ghana should use reasonable efforts to liaise with issuing authorities in order to expedite the issue of permits, or receive confirmation in writing that Eni Ghana can continue to operate/permits are not required (where issuing authorities are slow to issue permits without reason).	Minor (Q2/Q3, 2021)	Superseded (see 003_09/22)
002_ 5/21	Well conversion	Work is currently underway to prepare documentation for the forthcoming conversion of well GI-3. Care is needed to ensure commitments made by Eni Ghana during previous drilling campaigns are reinstated for future drilling/well workover activities.	PS1 and ESAP	Preparation of updated documentation is required with specific references to WBG Performance Standards (for example, in the Bridging Document for GI-3) and applicable environmental management plans in addition to the Waste Management Plan. Specific management plans, or elements therein for consideration should include <i>inter alia</i> : <ul style="list-style-type: none"> • Marine Traffic Management Plan; • Marine mammals and sea turtle protection policy (with respect to underwater noise); • Well Control Emergency Response Plans (as per ESAP item #3); and 	Minor (prior to future drilling)	HOLD (future drilling is on hold, however finding remains valid should drilling recommence))

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
				<ul style="list-style-type: none"> Environmental monitoring and reporting. <p>Any applicable Eni Ghana management plans necessary to supplement Saipem's MS should be provided to Saipem.</p>		
003_ 5/21	Audit Programme – waste service provider	IESC notes that three corrective actions identified during the 2017 audit of Zoil, including one major non-conformity relating to the storage area of Oil Based Muds (OBMs), have not been closed (or have been reopened).	PS1 and PS3	Eni Ghana should follow up on significant 'open' actions on a regular basis and consider alternative disposal options for any future OBMs until the audit action is closed and it is satisfied with the OBM storage arrangements offered by Zoil.	Minor (quarterly until resolved)	Open (this item has been closed in Eni Ghana tracker, however evidence has not been presented to the IESC)
004_ 05/21	Water Supply Project – Water Quality	The IESC notes that the water quality test results for May 2021 show that the standard for phosphate (2.5 mg/l) was exceeded with the measured value being 4.68 mg/l. It is not possible to know if this an anomaly or a result that may be repeated in the future.	PS1 and PS4	<p>Eni Ghana to organize a repeat water quality test as soon as possible with results being obtained prior to the handover of the water supply project to the communities. Should the exceedance occur again then Eni Ghana needs to investigate the cause and implement remedial measures</p> <p><i>Post VSV note: the IESC understands the Water Supply Project has been handed over to the Water Board Committee and Eni Ghana no longer has a supervisory role. Eni Ghana should therefore forward the above recommendation to the Water Board Committee and provide assistance commensurate with Eni Ghana's ongoing support role.</i></p>	Minor (within 1 month of this report)	Closed Following the handover, Eni Ghana have continued to conducted engagement with the Water Board Committee. During these meetings Eni Ghana have provided recommendations for the Water Board Committee to conduct water quality test at least twice a year.

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
005_ 05/21	Water Supply Project – Water Quality	Within the space of almost two years, exceedances of two water quality parameters have been found. Currently, sampling occurs every 6 months. The water supply project was extended, recently, with an increase in customer use (including a school canteen).	PS1 and PS4	The frequency of sampling should be increased until water quality is shown to meet, consistently, drinking water quality standards. Eni Ghana to forward this recommendation to the Water Board Committee and enter into a discussion with the Water Board Committee to reach agreement on how the increased sampling costs will be met and a decision made on the future required sampling frequency once the Committee is confident that water quality meets the required standards.	Moderate (increase frequency in Q3, 2021)	Closed Since May 2021, additional testing has been undertaken. Results of the September 2021 sampling as reported by Eni Ghana were that all parameters were within guideline values of drinking water.
006_ 05/21	LDPj-CIS- Livelihoods Project	This project is time-bound and agricultural success is dependent on seasonality factors with the appropriate action being taken at the correct time. Should actions/seasons not correlate then the initiative could fail.	PS1	Eni Ghana (SLC department) to ensure that all other Eni Ghana departments, with a role in delivery of this project, are fully aware of this risk and that each of these departments is provided with a schedule of actions and key dates which will act as an ' <i>aide-mémoire</i> ' to help ensure 'on-time' delivery of their contribution to the project.	Minor (Q3, 2021)	Closed A schedule of actions has been prepared for implementation of the project.
007_ 05/21	Influx	The current approaches to estimating the DAoI village populations do not provide data on the origin of residents. Therefore, it is not possible to analyse migration flows within the DAoI and in/out of the DAoI.	PS1	Eni Ghana to adapt the methodology to be used in the 2023 influx study to include a question/s about the origin of the respondent and his/her family members.	Minor (by end 2022)	Closed The Third Household Survey that was conducted in April 2022 was a survey on migration, and included questions about the origin of the respondent and his/her family members.

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
008_ 05/21	Emergency Response Planning	There is a discrepancy between the wording of the AMR template and Eni Ghana's schedule for emergency response planning (inclusive of oil spill exercises); AMR the template requires three desktop and one full-scale oil spill response exercises per year.	PS1	The discrepancy should be resolved with the WBG and consistency between the AMR and Eni Ghana's schedule for emergency response planning (inclusive of oil spill exercises).	Minor (Q3, 2021)	Superseded (see 002_9/22)
009_ 05/21	Management of Change	<p>Eni Ghana's HSE Management of Change Procedure (HSE PRO 017.00) does not provide any linkages with Section 11.5 of the ESHMP (MoC section), nor does it specify requirements for notification of changes to the WBG. Consequently, there is a risk that notification requirements to the WBG might be overlooked when following the Procedure.</p> <p>The IESC was shown the current MoC register, which listed two change requests from 2019 and 2020. The register does not include changes relating to the SLC activities and it is therefore unclear whether the SLC team</p>	PS1	<p>As a minimum, the MoC procedure should cross- refer to Section 11.5 of the ESHMP, or preferably duplicate specific elements in the ESHMP, including notification requirements.</p> <p>Consistency between SLC and HSE Departments Management of Change procedure(s) should be confirmed/ensured by Eni Ghana.</p> <p>Eni Ghana to provide relevant MoC documentation, including E&S risk assessment(s), as per WBG's request.</p>	Minor (Q3, 2021 and in no event later than start of drilling for GI-3)	<p>Closed (MoC procedure updated 24 Nov 2021 to address IESC finding)</p> <p>(register updated to include both SEQ and SLC MoC requests)</p>

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
		<p>is following a separate MoC procedure.</p> <p>The IESC understands the future well conversion (GI-3) will be subject to the MoC Procedure.</p>				Superseded (well conversion put on Hold)
010_ 5/21	Demobilisation of DAoI workers	During the May 2019 site visit, the IESC was informed that Eni Ghana intended to repeat its 2019 survey of DAoI workers and their re-integration into the local economy. Due to unforeseen circumstances, particularly COVID-19 restrictions, Eni Ghana did not repeat the survey in 2020.	PS2	Eni Ghana to repeat the survey.	Minor (by end 2021)	Closed A repeat of the demobilisation survey was conducted in April 2022 and involved interviews of 250 previously demobilised workers in the communities of Sanzule, Bakanta, Krisan and Eikwe.
011_ 05/21	Ambient air quality - monitoring	In 2020 the monitoring programme was revised to exclude sampling at the helipad and pipeline areas. Any changes to the sampling programme should be agreed with the WBG; at the time of the VSV, WBG representatives did not recall such an agreement.	PS3	The IESC recommends that prior agreement with the WBG to amend the monitoring programme should be confirmed. In the event such agreement was not reached prior to the changes, Eni Ghana should retrospectively agree this change with the WBG.	Minor (Q3, 2021)	Closed (WBG fully aware and no objections raised)
012_ 05/21	Stack emissions monitoring	A CEMS will be commissioned in late 2021. 2023	PS3	A robust calibration is performed to ensure data generated by the CEMS is accurate	Minor (Q4, 2021)	Open

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
				and reliable in the absence of the originally envisaged stack emissions sampling. The CEMS should be calibrated to allow recording and reporting daily averages, under temperature and oxygen conditions required in WBG EHS guidelines.	(Q1, 2023)	(pending commissioning of the CEMS)
013_05/21	Noise monitoring	The industrial noise standard has been selected for the PAC. The IESC questions the appropriateness of the industrial/commercial standard when the PAC is intended to provide restful residential accommodation.	PS3	The appropriate noise standard for the PAC should be agreed with the WBG. The IESC further recommends a review of the sampling locations to ensure appropriate outdoor locations have been selected. In the event application of the residential noise standard is confirmed by the WBG it is recommended noise levels are measured at the façade of residential buildings. Such areas are unlikely to be affected by freezer fans and air conditioning units. Noise levels inside accommodation should also be measured to confirm restful conditions.	Minor (Q3, 2021)	Closed (following review of indoor noise levels and overnight stay at the PAC)
014_05/21	Fishing canoe incursions into the FPSO exclusion zone	The incursion of fishing vessels continues to present a significant security risk. The cumulative number of incursions in 2021 is likely to exceed the 2020 cumulative total of ~5,200.	PS4	Eni Ghana to: Resume noting vessel identifiers and, subsequently, recording data on the origin and ownership of vessels. If FPSO staff are reluctant to note vessel identifiers, then the FLOs on the ' <i>Pacific Python</i> ' should be given this task and, as necessary, two additional FLOs should be recruited to be based upon the FPSO and perform the same duties as the ' <i>Pacific Python</i> ' FLOs; and	High (Q3, 2021 and continuing)	Closed (incursions have ceased following start of Navy patrols)

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
				Continue to implement its best endeavours to reach appropriate bilateral and/or multilateral MoUs/agreements (compliant with PS4 requirements regarding deployment of government security personnel) that will reduce, significantly, the scale of fishing canoe incursions.		
015_ 05/21	Onshore security management at ORF	An informal arrangement exists between Eni Ghana with respect to the detachment of military police based in the vicinity of the ORF.	PS4	Eni Ghana continues to implement its best endeavours to reach a formal agreement with the military police.	Moderate (continuing)	Superseded See 020_ 09/22
016_ 05/21	Onshore security management at ORF	There is now a permanent police presence at the ORF and there is a pre-existing agreement between G4S and the police. The details of the agreement appear not to be known by Eni Ghana which poses a risk of non-compliance with the Project standards for security management.	PS4	Eni Ghana to take steps to ensure that is fully aware of the agreement and considers its implications in terms of Eni Ghana's ability to abide by the security standards that apply to the Project. As necessary, action will be taken through a local variation to the agreement to ensure that the agreement is aligned with Eni Ghana's expectations.	Moderate (Q3, 2021)	Superseded See 021_ 09/22
017_ 5/21	Community health and safety	The electricity connections installed on external walls of 'options' structures appear to have minimal protective enclosures and exposed wires that are within easy reach of children. Thus, installations pose a community health and safety risk.	PS4	Eni Ghana undertakes a community-focused health and safety risk assessment of all the electrical connections to 'options' structures and implements measures that will reduce the risk to an acceptable level, where necessary.	Moderate (Q3, 2021)	Closed The ECG contractor implemented corrective measures to all the 35 structures. Eni Ghana in-house engineer

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
						confirmed corrective measures had successfully reduced the risk posed to the community.
018_05/21	Livelihood restoration: LR Programme 'Support Services'	LRP completion is expected at end July 2021. Purchase requisitions, to enable certain necessary services to be implemented, were only submitted recently. Assuming procurement can be finalized by the end of May; then this leaves only two months for implementation of the required services and the expected results, in terms of livelihood restoration, to occur.	PS5	Eni Ghana to give priority to completion of the procurement process so that the services can be delivered as quickly as possible.	Moderate (N/A)	Superseded See new actions under PS5
019_05/21	Livelihood restoration: Monitoring and evaluation	Eni Ghana is using a comparison of pre- and post-LRP incomes as a metric for deciding on livelihood restoration status. There are three weaknesses in this approach: <ul style="list-style-type: none"> Focus on incomes alone to determine livelihood restoration status is not aligned with the LRP approach to 	PS5	Eni Ghana to implement the following actions: <ul style="list-style-type: none"> Expanding the metrics used to monitor and evaluate the status of livelihood restoration; ideally adding metrics that provide an indication that livelihood restoration, including aspects such as 'standard of living', is likely to be sustainable over time; Ensuring that comparisons of incomes pre- and post-LRP must take account of inflation before 	High (all continuing)	Superseded See new actions under PS5

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
		<p>determining livelihood restoration status;</p> <ul style="list-style-type: none"> The comparisons exclude reduction of purchasing power due to inflation; Revenues are compared to incomes, but reports do not justify the validity of this comparison clearly; and 'Average' incomes are used. Averages have limitations as they can conceal significant differences in performance by differing groups of PAPs; unless they are accompanied by complementary information for different groups. 		<p>reaching a conclusion that livelihoods have been restored/improved;</p> <ul style="list-style-type: none"> Future Eni Ghana and TechnoServe reports to contain text that provides a justification for the approach of comparing revenues to incomes; and <p>Average values, should only be used when complemented by provision of more fine-grained information on specific groups.</p>		
020_05/21	Livelihood restoration: Monitoring and evaluation	Current Eni Ghana and TechnoServe reporting on livelihood restoration status does not clearly and unambiguously provide a breakdown of livelihood restoration status between	PS5	Eni Ghana to ensure that vulnerable PAPs are identified clearly and livelihood restoration status for the vulnerable PAPs is presented, consistently, in all future reporting on livelihood restoration status.	High (continuing)	Open To be reviewed as part of ongoing reporting of livelihood restoration status.

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
		vulnerable and non-vulnerable PAPs.				
021_ 05/21	Biodiversity staff training records	Not all training listed could be verified making it difficult to track BAP targets relating to training.	PS6	Full training transcripts and correctly dated attendance records should be kept for all training sessions held, with a date clearly shown. These should be provided as an Annex to the QMR and AMR reports.	Minor (continuing)	Open (Only two staff biodiversity training events (relating to birds and marine mammals) reported in the latest reporting period, but no full training transcripts were provided to verify content (only screengrabs from Teams presentations))
022_ 05/21	End of Season shorebird monitoring report	The end of season monitoring report provided for shorebirds covers the period from June 2020 to February 2021; however the peak season against which BAP targets are measured extends from September to April, therefore the logical timing of the end of season report would be May. Similarly, the logical timing of the end of season vulture and forest bird report would be the January, following completion of the December surveys.	PS6	Confirm that the final End of Season shorebird monitoring report each year will be prepared following the month of April, when all peak season data has been collated to ensure that it includes clear reporting against all BAP targets for shorebirds. In addition, confirm that the end of season report for vultures and forest birds will be January, following completion of the December surveys.	Minor (Q1/Q2, 2022)	Closed (End of Season reporting now timed appropriately for accurate reporting against BAP targets)

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
023_ 05/21	Staff training on birds	The subject of the staff training material for birds lacks the specifics of key bird species of interest in the vicinity of the Project site and Eni Ghana's commitments relating to these.	PS6	Specific information should be added relating to the key bird species of interest in the vicinity of the Project site and Eni Ghana's commitments relating to these, in line with the requirements of the Avian BAP.	Minor (Q3, 2021)	Open (It was verbally indicated by ESL during the monitoring visit that this material has been added, but no full updated induction training transcript has been provided, or evidence that new staff joining during the reporting period have been trained in accordance with the BAP requirements)
024_ 05/21	AIS and topsoil management	Although it is understood that no further importing of topsoil is planned, there will need to be robust mechanisms in place to ensure no further introductions of alien invasive species occur.	PS6	Confirm that the Prevention and Control of AIS Standard which is in the process of finalisation will include measures to prevent the accidental introduction of AIS, including recognition that if any additional material is brought to site its origin will be verified to ensure it is not resulting in AIS introduction.	Minor (Q3, 2021)	Closed (Operational Procedure for Prevention and Control of Alien Invasive Species now in place and signed off by IFC)
025_ 05/21	Marine Mammal and Sea turtle Protection Policy and Plan	In addition to incidental sightings of marine mammals and sea turtles, it is noted that further noisy works may occur during the production phase, therefore it is noted that there will also be a need to conduct	PS6	Ensure that records are kept relating to the scheduling of noisy works to avoid key sensitive periods for marine mammals and sea turtles and the briefing of any new vessels, including drill ships, coming to site on the requirements of the MMSTPPP, including the delivery of specific training on	Minor (continuing)	Open (no watches reported in the monitoring period, therefore it is assumed that no noisy works to place, though marine

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
		dedicated watches prior to such works to ensure the area is clear before start-up.		the importance of maintaining distance and using dedicated navigation channels where applicable. Records should also be kept of dedicated watches prior to new noisy works such as drilling events. The MMSTPPP should be amended to include dedicated watches when noisy activities are taking place.		mammal training was conducted for specific personnel during the reporting period) Update of MMSTPPP to include dedicated watches during noisy activities (e.g. drilling) to be captured before issue can be closed
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 thus contribute to the management of cumulative impacts	Production phase	Eni Ghana to remain committed to the management of cumulative impacts in cooperation with public and private entities comprising the platform. IESC recognises Eni Ghana's reliance on external parties and the need for such parties to reach agreement.	NA	Open (This work is progressing but remains 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 (no additional information provided in the 2021 AMR.)

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
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	Closed (incursions ended in Nov 2021)
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	Closed (stack emission monitoring has commenced)
001_5/19	Community investment (potable water supply QIP)	Development of more robust management of the potable water supply project	PS1	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	Closed Eni Ghana have supported the development of

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
			Construction and Production			additional water collection points to support usage and have engaged with the WBC on the transfer, including agreeing on warranty periods.
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	Closed (issue caused by number of workers/visitors to the pilot accommodation exceeding T cards. This is no longer a risk given the small numbers entering the site during production phase)
009_5/19	Community water quality	Eni Ghana/ESL has not undertaken water level/drinking water quality monitoring from community wells. 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.	PS3 Construction and Production	Eni Ghana should clarify its position with respect to the monitoring of water quality from community water wells and fulfil the requirements of the Environmental Monitoring Programme (2018). 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.	Minor	Open (Remains open unless Eni Ghana can confirm no use of the wells. SLC manages monitoring of water quality for the water supply project)

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
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	<p>SMP – Closed (signed off by WBG)</p> <p>MoU for Navy - Closed</p> <p>MoU for military police – Superseded (see 021_9/22)</p>
011_ 5/19	Project Security Management Plan – fishing	Incursion of fishermen into exclusion zones	PS4	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	High	<p>Closed (incursions have ceased following</p>

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
	vessel incursions		Construction and Production	consider experience from other West African regions and those beyond West Africa to identify effective practices that may be transferable to OCTP). 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.		agreement on a MoU with the Navy)
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. The NNL Strategy for Natural Habitat is now in place with the full Implementation Plan due for completion by end 2021.	Moderate	Closed (Approved Implementation Plan now final and commencing 2022)
012_09/18	Labour management	Reinforcement of induction training on worker terms and conditions of employment and worker rights and responsibilities	PS2 Construction and Production	Amend the Worker Management Plan to contain a requirement for repeat refresher training on worker terms and conditions of employment and worker rights and responsibilities (as provided to new recruits during induction) and then implement the refresher training according to the schedule	Minor	Closed (The Workers Management Plan - Production [SUST-Plan-003] includes actions on refresher training.

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
				set out in the revised Worker Management Plan.		
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 focusing on vulture conservation, possibly targeted to the nearby villages known to hunt vultures. This task has now been taken on by ESL with vulture conservation signage now drafted and awaiting approval prior to full roll out of the awareness campaign and clear annual BAP targets set.	Moderate	Closed (Annual community awareness activities now an ongoing BAP Action which has been successfully implemented in 2022)
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	Closed (based on information provided by Eni Ghana – IESC unable to revisit FPSO for minor finding)).
008 9/17	Human Resources Policy	Eni Ghana does not have a Human Resources Policy that is tailored to its operations in Ghana.	Construction and Operations PS2	Prepare, approve, disseminate and implement an Eni Ghana – specific Human Resources Policy. This policy to include explicit statements that child and forced labour will not be employed and trafficked persons will not be hired.	Minor	Closed The Workers Management Plan for production phase (SUST-PLAN-003) include references to the prohibition of child and forced labour.

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
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	Closed The Workers Management Plan for production phase (SUST-PLAN-003) include references of the prohibition of child and forced labour.
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	Closed The Workers Management Plan for production phase (SUST-PLAN-003) include high-level measures for the management of worker accommodation and reference design standards.
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.	Moderate	Open (The SMP is close to approval/sign-off and then Appendix Q will be updated accordingly).

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
				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).		
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-Stakeholder Forum for managing cumulative impacts, including coordinated actions to manage influx.	Construction and Operations PS5	Eni Ghana must continue to support WBG efforts to establish a collaborative Multi-Stakeholder Forum. Establish whether the 'influx management approach' prepared by WRCF, is an appropriate basis for revising the Influx Management Plan by end of Q4 2017.	Moderate	Superseded (see 001_9/22) Closed 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	Superseded (See 019_9/17).

APPENDIX 5

PHOTOLOG



Photo 1. Well-equipped clinic at ORF



Photo 2. Successful reinstatement/erosion remediation – ORF surface water outfall was previously rutted bare soil



Photo 3. Successful reinstatement area showing good growth of planted shrubs and trees



Photo 4. Further evidence of successful reinstatement



Photo 5. Good hydrological connectivity and no evidence of adverse impacts - culverts allowing exchange of water across a road



Photo 6. Reinstated above gas pipeline (running parallel and to the right of the road)



Photo 7. Collapsed fencing intended to prevent grazing/protect coconuts



Photo 8. Community signage



Photo 9. Legacy plastic sheeting (originally used to protect bare soil above the pipeline)



Photo 10. Further example of loose plastic sheeting serving no function



Photo 11. *Pueraria phaseoloides* used as a cover crop to help restore soil fertility and suppress the growth of noxious weeds (former Consar workshop area)



Photo 12. Isolated patches of bare earth requiring further remediation.



Photo 13. Nursery continues to be maintained by ESL



Photo 14. Poor housekeeping – open bucket of waste oil exposed to rainfall without secondary containment



Photo 15. Area adjacent to Pilot Camp. Provides some limited opportunity for further reinstatement (pending approval from the Government to clear the site)



Photo 16. Beach front road to Bakanta (recently upgraded by Eni Ghana)