

APPENDIX C: ENVIRONMENTAL AND SOCIAL ACTION PLAN

No. ¹	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable / Frequency of Monitoring for Action	Target and Evaluation Criteria for Successful Implementation	Status
0.0	Facilitate and coordinate the International Environmental and Social Consultant, as agreed between EBRD and TANAP, to conduct monitoring of the project on 6 monthly intervals prior to operation of Phase 0. The audits will review the project against project commitments made in the ESIA and various Management Plans and against this ESAP. Reports will be reviewed by the company and released into the public domain.	Monitoring of project performance.	EBRD PR1-10	Resources: External Investment: Responsibility:	6 monthly prior to Phase 0 operations	Actions completed / status updated	
0.1	Operations phase monitoring will be implemented based on a ToR acceptable to EBRD using a consultant agreed by EBRD. The final scope of work for the monitoring will be provided to EBRD for approval on a no objection basis.	Monitoring of project performance.	EBRD PR1-10	Resources: External Investment: Responsibility:	To be in place prior to beginning of operations phase	Actions completed / status updated	
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	Disclose Offshore ESMS documentation including the Emergency Management Plan	Offshore ESMPs and Emergency Management Plan have been developed in draft form and being finalised but not yet disclosed.	EBRD PR1 (1.4) EIA EU Directive 2011/92/EU	Resources: In-house Investment: Responsibility:	Disclose prior to commencing offshore construction	ESMS documentation complete & disclosed.	
1.2	Provide a cost estimate for operational phase Biorestitution monitoring and maintenance sufficient for the length of the pipeline corridor and ensure sufficient contingency budget allocations for any newly identified biodiversity remedial and offset activities.	Financial provisions for implementation of BAP & Biorestitution monitoring and maintenancerequirements may not be sufficient to adequately characterise biorestitution effectiveness.	EBRD PR1 (1.7)	Resources: In-house Investment: Responsibility:	Prior to operations phase	Rationale behind costs provided and deemed sufficient	
PR2	Labour and Working Conditions						
2.1	Develop strengthened documentation and key actions for agreement with TANAP and EBRD on overtime, to be incorporated into the ESMS, as follows: (a) Develop and conduct a program of engagement with CC workers through appropriate mechanisms (e.g. HR Managers) to clarify overtime policy at the site level and strengthen worker understanding of policy; (b) Continue to implement procedures, plans and employment contracts consistent with working hour policies. TANAP to share labour audit reports from external provider (Practical Solutions) with EBRD.	Overtime work and fatigue management were raised on several separate occasions in the grievance mechanism. There is confusion at a site level as to the TANAP policy on overtime. TANAP is working to address overtime issues through a "Working Hours Action Plan", but it is noted that emphasis is directed to legal compliance around overtime, and it is not clear what fatigue management measures are in place and how these measures are linked with effective overtime management. Further, contractors are financially incentivised for being on time/advance of deadlines, which may contribute to the issue of overtime and fatigue. IESC recognises that the reduction of LTIs is a focus area for TANAP.	EBRD PR2 (2.1) ILO Core Labour Standards	Resources: In-house / Contractors Investment: Responsibility:	(a) Engagement program shared with EBRD by Sept 2017. Ongoing engagement as per program. (b) Labour Audit Reports completed by external provider (Practical Solutions) during construction activities to be shared with EBRD.	· Program rolled out to all workers. · Fewer grievances are lodged about overtime/fatigue. · All documents are consistent. · Fewer non-conformances by contractors	
2.2	Fatigue Management: (a) Develop a Fatigue Management Plan for TANAP and implement this across the project; (b) Agree the Plan and its timeframe for implementation with the EBRD; (c) Implement the Plan as agreed.		EBRD PR2	Resources: In-house / Consultant Investment: Responsibility:	Fatigue Management Plan to be developed by TANAP prior to EBRD Board meeting	Plan developed and agreed Plan implemented as agreed	
2.3	Termination and retrenchment provisions: (a) Share with EBRD the Retrenchment Plans of each of the CCs; (b) Share the first two quarterly monitoring reports of the Retrenchment Plans, undertaken by TANAP of the CCs.	Interviews with short term labour suggests that not all CCs are making clear what the working conditions (including retrenchment/termination) are. TANAP requires provision of a document of resignation or notice of termination, in practice notice periods for dismissal may be occurring inconsistently, particularly in relation to casual / short-term work. It is noted that the CCs are required to prepare Retrenchment Plans.	EBRD PR2 (2.5) ILO Core Labour Standards	Resources: In-house Investment: Responsibility:	September 2017 for Retrenchment Plans Quarterly Monitoring Reports as these are available, by latest December 2017	Engagement conducted and documented. Form amended.	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	Provide annual reporting of GHG emissions to the EBRD in line with their accepted methodology.	The EBRD requires that operations that produce more than 25,000 tonnes CO ₂ -equivalent annually, (which TANAP does), quantify and report these emissions to the EBRD annually, in accordance with the	EBRD PR3 (3.4)	Resources: In-house / Consultant Investment:	1 st Quarter 2018 & annually thereafter	Annual reporting conducted	

¹ These numbers refer to the action item, and are not a reference to the relevant section of the Performance Requirements. Reference to Performance Requirements are provided in the column titled Requirement (Legislative, EBRD, PR, Best Practice).

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		EBRD Methodology for Assessment of Greenhouse Gas Emissions.		Responsibility:			
PR4	Health and Safety						
4.1	Develop a program on the prevention and management of communicable diseases in Project-affected communities: (a) Develop the program Terms of Reference for EBRD approval; (b) Implement the program as agreed, including regular monitoring and reporting; (c) Share with EBRD for the Banks' comment the plans for worker training on communicable diseases.	CCs' Community Safety MPs make commitments to provide periodic communicable disease training to workers and training on worker interactions with community members. The Community Safety MP requires that the CCs will prepare studies on incidence of communicable diseases in affected Provinces, based on epidemiological information available, to ensure that all precautions are taken to prevent the transmission of such diseases due to the presence of workers. Engagement is required by CCs with local health authorities to agree appropriate mitigation strategies as required. This is reflected in CCs' MPs, although it is not clear if such engagement / studies have been undertaken by all CCs. It is noted that TANAP has plans in place for worker training. Communicable disease management is provided for occupational response, in the Medical Emergency Response Plan, however this Plan does not extend to community health response to Project-induced communicable disease.	EBRD PR4 (4.8)	Resources: Contractors / Consultant Investment: Responsibility:	August 2017 (ToRs and the worker training plans) September 2017 (commencement of Program implementation)	Epidemiological studies conducted and findings incorporated in management approach / community health programs	
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	RAP Fund Management: (a) Provide EBRD with a copy of the final RAP Fund Management Procedure and associated documents (including brochure for information dissemination); (b) Provide for EBRD the stakeholder engagement plan, Annex 2 on RAP implementation, including specific provisions for engagement with vulnerable households.	The Cut-off date from the original RAP could not be met, and BOTAS has developed a practicable approach to evaluating and compensating every additional claim and justified complaint even after the cut-off date. TANAP should ensure that this commitment is met through the retrospective study to compensate all eligible PAPs (i.e. all members of households' dependent on land income in addition to identified title holder, descendants of deceased land title holders with no formal paper, people with no formal title to land; customary users of land, disputed ownership, etc., as per the revised Entitlements Matrix) and subsequent monitoring and auditing processes.	EBRD PR5 (5.2)	Resources: In-house / Consultant Investment: Responsibility:	August 2017 (implementation of engagement on the RAP Fund procedure)	Process determined and implementation commenced	
5.2	Livelihood Restoration Program (LRP): (a) Provide for EBRD comment the LRP for AGI-affected settlement prior to the Plan's disclosure; (b) Provide a copy of the completed Offshore Fisheries LRP to EBRD.	TANAP is commissioning a retrospective study (due for completion in July 2017) to identify and compensate PAPs who have not been yet been compensated under the new Entitlements Matrix framework. Further, TANAP has committed to providing for full replacement cost for all assets and will ensure that lost income is fully restored through the compensation process.	EBRD PR5 (5.5/5.6)	Resources: Investment: Responsibility:	Prior to EBRD Board meeting	Livelihood Restoration Program developed in line with PR 5. EBRD to agree on contents of Program.	
5.3	RAP Monitoring: (a) Provide to EBRD a copy of the Quarterly Internal Monitoring Report (which includes monitoring of the RAP Fund, and implementation of the Corrective Actions Register); (b) Provide to EBRD the results of external regular monitoring of the RAP, including payments from the RAP Fund.	Livelihood Restoration Plan (LRP), RAP Fund Guidance and documentation. Some payments are reported to have already been made from the RAP Fund, and for transparency these should be reconciled following approval of guidance on implementation of the Fund. The new RAP documents should be developed according to the identified timeline and publicly disclosed in a mode appropriate to the intended audience. The AGI and pipeline RAPs specify monitoring and evaluation mechanisms including indicators, implementation schedule, and budget. These RAPs would be subject to IESC/independent monitoring and review throughout implementation in accordance with GIP. Both internal and external monitoring have commenced, with the 1st Quarterly Internal Monitoring Report (March 31, 2017) reviewed by the IESC in May 2017. TANAP has contracted independent experts for RAP External Monitoring and will produce their 1st Semi-Annual External Monitoring Report in June 2017. A site visit and investigation by the RAP External Monitoring Team was completed as of May 5, 2017. This monitoring, in turn will, inform the Impact Evaluation at the conclusion of the LA and livelihood restoration program.	EBRD PR5 (5.5)	Resources: Consultant Investment: Responsibility:	Prior to EBRD Board meeting and quarterly for internal RAP monitoring and semi-annually for external RAP monitoring throughout construction period.	RAP External Monitoring Team Audit completed and first Semi-annual external monitoring Report. Results submitted to EBRD / IESC for review. Actions agreed and Corrective Actions tracked and monitored.	
PR6	Biodiversity and Living Natural Resources						

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6.1	Develop and implement a Biodiversity Offset Strategy document that: (a) Quantifies residual impacts to Priority Biodiversity Features and Critical Habitats, as defined in the BAP [Rev P3 – 10] (b) Identifies specific biodiversity; management actions, in accordance with the mitigation hierarchy, to achieve No Net Loss / Net Gain outcomes of these species and habitats of conservation importance; (c) Quantifies No Net Loss / Net Gains based on the successful implementation of the above actions over a reasonable timeframe.	The BAP [Rev P3 - 10] does not quantify how the project's biodiversity management actions will result in No Net Loss of Priority Biodiversity Features and/or Net Gain of Critical Habitats, as per EBRD's Performance Requirement 6	EBRD PR6	Resources: Third Party / Internal Investment: Responsibility:	Submission of the draft Biodiversity Offset Strategy Q3 2017 Final report to be disclosed by TANAP prior to EBRD Board Meeting	Submission of the draft Biodiversity Offset Strategy Final report disclosed by TANAP prior to EBRD Board Meeting	
PR7	Indigenous People						
7.1	Not applicable						
PR8	Cultural Heritage						
PR10	Information Disclosure and Stakeholder Engagement						
10.1	Disclosure and actions to address common grievances: (a) Conduct disclosure to communities of summary grievance data and measures taken by TANAP and CCs to address the common causes of grievances; (b) Include a specific section regarding resettlement related grievances to be disclosed in summary form to relevant resettlement-affected stakeholders, with measures taken by TANAP to address the common causes of these grievances.	The main grievances received since project commencement relate to damage to property and land, and the land acquisition process. A quarter of all complaints registered related to damage to land. The grievance process provides for legal redress, and Appeals Committees are additionally established to provide third party review of grievances between TANAP and complainants. This Committee intends to provide an additional level of independent review of any unresolved complaints or grievances.	EBRD PR10 (10.2)	Resources: In-house Investment: Responsibility:	September 2017 & thereafter annually	Disclosure completed. Records available demonstrating disclosure conducted.	
10.2	Provide evidence to EBRD of the modality of public disclosure of existing key project ESMPs, including the BAP and RAP documents.	ESIA documents were disclosed on the TANAP website, with key documents in English and Turkish. Supplementary reports prepared included the RAP for Above-Ground Installations (AGIs) and the RAP for the Pipeline, prepared and disclosed due to material changes in the Project. However, while the IESC recognizes that disclosure has been achieved online, the modality of disclosure to communities in a form and format readily understood by stakeholders is ongoing with the development of additional resettlement-related documents (i.e. including the RAP Fund procedure and associated brochure). The latest version of the BAP has yet to be disclosed and should be undertaken in line with GIIP.	EBRD PR10 (10.3)	Resources: In-house Investment: Responsibility:	Prior to EBRD Board meeting	Information provided and issue resolved. Information provided and issue not resolved, additional actions agreed	