

Esso Highlands Limited



Papua New Guinea LNG Project

**Environmental and Social Management Plan
Appendix 18: Community Impacts Management
Plan**

PGGP-EH-SPENV-000018-022

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ACRONYMS

Acronym	Definition
BPEA	Best Practices in External Affairs
CP	Contractor Plan
EMP	Environmental Management Plan
ESMP	Environmental and Social Management Plan
IFC	International Finance Corporation
OIMS	Operations Integrity Management Plan
SEP	Company Stakeholder Engagement Plan

KEY DEFINITIONS

Community: A group of interacting people living in a common area. Recognises that there are multiple, self-identified groups in Company area.

Contractor Plan: A Plan to be prepared by Contractor. To be used by Contractor to describe how the mitigation measures outlined in this Plan will be implemented.

Grievance: A formal complaint lodged by stakeholders alleging damage, impact or dissatisfaction.

Verification (refer Table 1): The primary method of monitoring expected of Contractor to a) confirm that relevant mitigation measures have been applied and b) that the measure has been effective. Contractor will be responsible for developing appropriate verification methods and systems.

Notification (refer Table 1): An action arising out of monitoring that is expected of Contractor when the Company needs to be notified immediately of a specific event or situation.

1.0 OBJECTIVES

Esso Highlands Limited (Company) has developed this Community Impacts Management Plan as part of its Environmental and Social Management Plan (ESMP) outlining a range of mitigation measures designed to avoid or reduce undesired community impacts during construction. This document establishes a basis and template for use by the Contractor to develop their own plans outlining not only mitigation measures but to also incorporate the roles and responsibilities described in the ESMP.

The objectives of the Community Impacts Management Plan are:

- Prevent risk and consequential adverse impacts of Contractor activities on the health; safety and well-being of individuals and communities;
- In the event that damage or harm is caused, repair or restore to at least pre-disturbed condition; and
- Establish the basis for keeping communities aware and informed of pending construction activities and the potential for these activities to disrupt their daily activities.

The scope of the plan is intended to cover all communities potentially impacted as a result of construction-related activities.

This Plan should be read in conjunction with other environmental and social management plans (EMPs and SMP's). Figure 1 outlines the relationship between EMP's and SMP's. (See also Table 2).

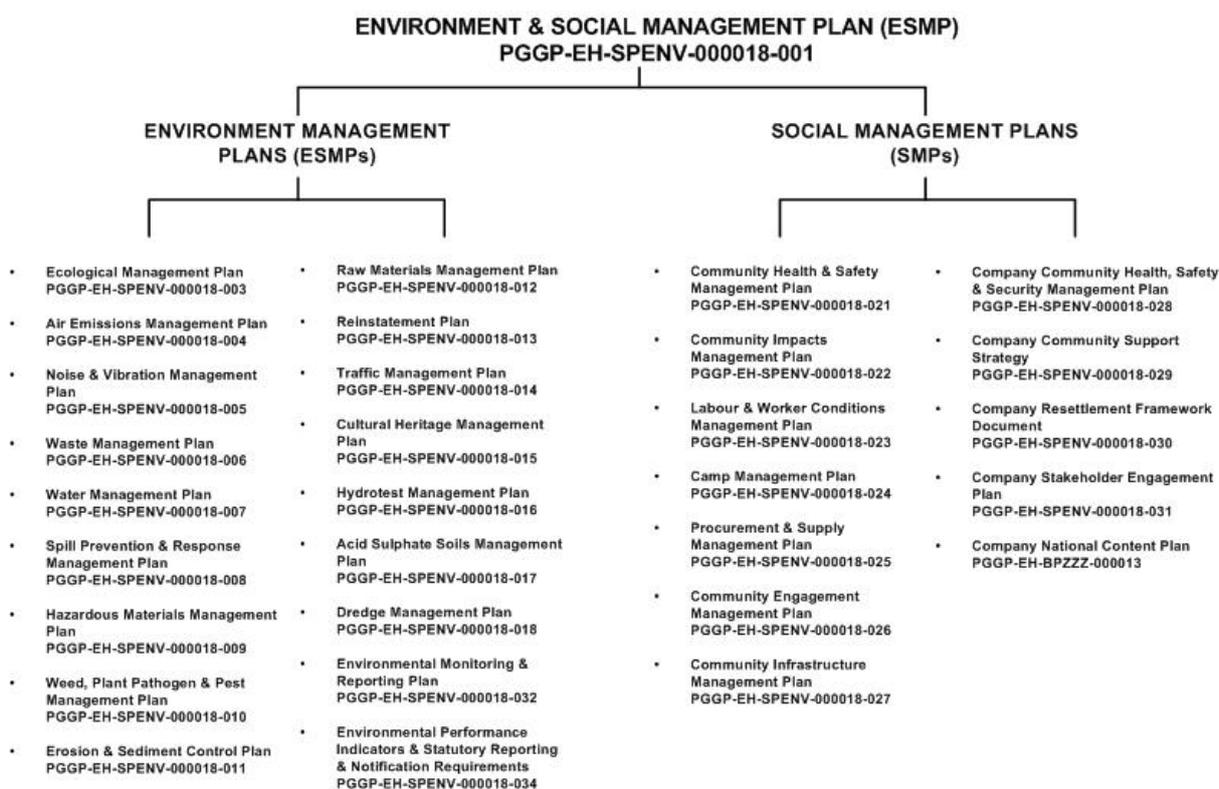


Figure 1: Environment and Social Management Framework

2.0 LEGAL AND OTHER REQUIREMENTS

Legal and other requirements applicable to this Plan are identified in Attachment 1.

3.0 SURVEYS

No surveys are required to be carried out by Company specifically in relation to the implementation of this Plan. Baseline surveys that will generate data potentially relevant to this plan are described in the following documents: Community Infrastructure Management Plan; Noise and Vibration Management Plan; Water Management Plan; and Land Manual¹.

4.0 MANAGEMENT AND MONITORING

Figure 2 presents a flow chart summarising key management steps associated with implementation and review of this Plan, including steps to allow for continued improvement.

¹ In addition, refer to the Social Mapping and Landowner Identification studies presented in the EIS.

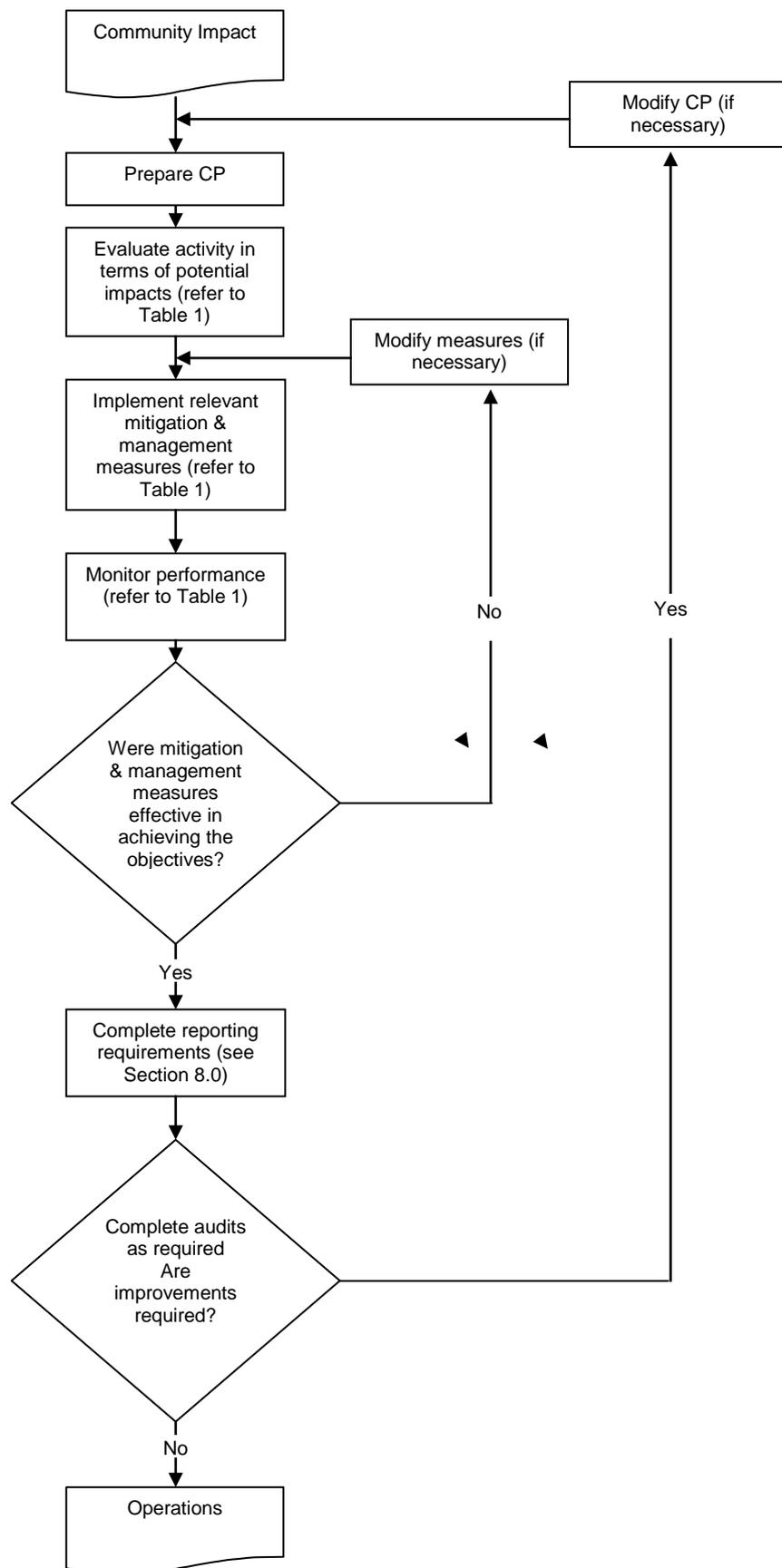


Figure 2: Community Impacts Management Process

Table 1 presents a summary of the potential community impacts, together with mitigation and management measures to avoid or minimise these impacts, and the monitoring required to determine the performance of these measures.

Contractor shall develop a Contractor Plan which shall, as a minimum, incorporate the community impact measures described in Table 1. Contractor shall not be limited to these measures.

Monitoring to be undertaken as part of this Plan is also described in Table 1. Contractor is responsible for developing area- or site-specific procedures for the monitoring program (where necessary) based upon the final design details of the infrastructure.

This Plan contains many links to other SMPs and EMPs due to the fact that Project-induced changes to the biophysical environment (air, water, soils, etc) can affect community use of, and dependencies on, the various attributes that collectively define the environment in which the communities live. These links are summarised in Table 2.

Table 1: Management and Monitoring

Source of Impact	Potential Impact and Relevant Management Plan Objective†	Mitigation and Management (Design Feature/ Specific Measure)	ID	Monitoring	Monitoring Frequency	Responsibility
<p>Improved road conditions</p>	<p>Increased traffic volumes and traffic speed</p> <ul style="list-style-type: none"> • Increased population trauma associated with accidents; • Pedestrian accidents especially where there are roadside stalls, schools; • Livestock fatalities; • Increased requirement for compensation payments (due to accident restitution); • Increased pressure on police to manage traffic issues; • Increased law and order incidents due to ease of movement (Raskols etc.); • Bystanders will likely be attracted to the works activity which could result in increased risk of injury; and • Improved access for local communities. (Objective 1) 	<p>The Project shall promote traffic safety. Prevention and control of traffic related injuries and fatalities shall include the adoption of safe measures that are protective of both Project workers and of road users, including those that are most vulnerable to road traffic accidents. Road safety initiatives shall include:</p> <ul style="list-style-type: none"> • Emphasising safety aspects among drivers (e.g. not using mobile phones while driving); • Establishing and enforcing appropriate speed limits; • Conducting pre-trip vehicle inspections (especially wheels brakes and tyres); • Improving driving skills and requiring drivers to carry valid licenses; • Avoid driver overtiredness (e.g. limit trip duration and arrange rosters); • Avoiding, where possible, dangerous routes and times of day e.g., night time driving to minimise the risk of accidents; • Use of speed monitoring devices on vehicles, where possible and consideration of locking 4x4 wheel drive vehicles in low gear mode; • Regular maintenance of vehicles and use of manufacturer approved parts to avoid potentially serious accidents caused by equipment malfunction or premature failure; • Coordination with emergency responders to ensure that appropriate first aid is provided in the event of accidents; • Using locally sourced materials, whenever possible, to minimise transport distances; and • Locating associated facilities such as worker interaction with construction vehicles (e.g., 	22.001	Verification	Ongoing	Contractor and/or Company

Source of Impact	Potential Impact and Relevant Management Plan Objective†	Mitigation and Management (Design Feature/ Specific Measure)	ID	Monitoring	Monitoring Frequency	Responsibility
		where practicable minimise routing construction traffic through villages, past schools camps close to Project sites and arranging worker bus transport to minimise external traffic.				
		Where the Project may contribute to a significant increase in traffic along existing roads, recommended measures for Project include: <ul style="list-style-type: none"> • Limiting pedestrian interaction with construction vehicles, etc; • Collaboration with local communities and responsible authorities where appropriate to improve signage, visibility and overall safety of roads, particularly along stretches located near schools or other locations where children may be present; • Collaboration with local communities on education about traffic and pedestrian safety (e.g. school education campaigns); and • Employing safe traffic control measures, including road signs and flag persons to warn of dangerous conditions. 	22.002 M36	Verification	Ongoing	Contractor and/or Company
Marine and river vessel movements <ul style="list-style-type: none"> • Increased shipping traffic (rivers and sea) causing disruption to local movements and accidents. 	Diminished safety and amenity	<ul style="list-style-type: none"> • Minimise illumination of vessel decks at nights without compromising safety. 	M195	Verification	Ongoing	Contractor and/or Company
	Interruptions to water traffic	<ul style="list-style-type: none"> • Notify local communities about Project marine and river traffic and the associated dangers of approaching vessels too closely. 	M185 M203	Verification	Ongoing	Contractor and/or Company

Source of Impact	Potential Impact and Relevant Management Plan Objective†	Mitigation and Management (Design Feature/ Specific Measure)	ID	Monitoring	Monitoring Frequency	Responsibility
Air quality (emissions) <ul style="list-style-type: none"> Vehicle exhaust emissions; and Stationary engine exhaust (generators). 	Community health resulting from impaired air quality (Objective 1)	<p>The Project shall ensure that emissions from vehicles comply with national or regional programs. In the absence of these, the following approach should be considered:</p> <ul style="list-style-type: none"> Implementing a regular vehicle maintenance and repair program; and Drivers shall be instructed on the benefits of driving practices that reduce both the risk of accidents and fuel consumption, including measured acceleration and driving within safe speed limits. 	22.003	Verification	Ongoing	Contractor and/or Company
Site hazards <ul style="list-style-type: none"> Community interaction with site hazards. 	Injury or death , especially during construction of pipeline where there are open trenches and where hazards exist at pipeyards/ laydown areas. Potential injury to community members who cross/enter Project sites in order to access game, gardens, etc, or local water craft tipping due to shipping wakes. (Objective 1)	<p>Where there is a potential for the community (including workers and their families) to be exposed to hazards. The Contractor shall:</p> <ul style="list-style-type: none"> Identify the hazard; Mitigate the hazard by modifying, substituting or eliminating the condition or substance causing the hazard; If the hazard conditions can't be eliminated, exercise special care to avoid or limit their exposure by erecting appropriate signs, security tape, fences and barriers, imposing vessel speed restrictions, and modifying, substituting or eliminating the condition or substance causing the hazards; Where hazardous materials are part of existing Project infrastructure or components, exercise special care when conducting decommissioning activities in order to prevent exposure to the community; Exercise commercially reasonable efforts to control the safety of deliveries of raw materials and of transportation and disposal of wastes; Provide a safe means of exit from confined spaces including excavations where appropriate; and 	22.004	Verification	Ongoing	Contractor

Source of Impact	Potential Impact and Relevant Management Plan Objective†	Mitigation and Management (Design Feature/ Specific Measure)	ID	Monitoring	Monitoring Frequency	Responsibility
		<ul style="list-style-type: none"> Control site-specific factors which may contribute to excavation slope instability to eliminate or minimise the risk of collapse, entrapment, or drowning (e.g. ditches and trenches). 				
		Contractor shall limit the amount of pipeline trench left open at any one time. Safety barricades, pedestrian crossings and other methods to prevent people or animals (livestock) from falling into open trenches should be constructed in sensitive locations (e.g. within 500 m of human populations). In remote areas review practicality of installing wildlife escape ramps in open trenches.	22.005	Verification	Ongoing	Contractor
		Contractor shall physically exclude community members from construction and material storage areas, including accommodation camps and their associated infrastructure, such as sewage plants and water storage facilities. Where physical exclusion is not possible, erect warning barriers with appropriate signage and utilise security patrols to ensure compliance in sensitive locations.	22.006	Verification	Ongoing	Contractor
Fire due to: <ul style="list-style-type: none"> Brush/forest clearing; Construction operations such as pipe welding, refuelling, machining, transport accident; and Accident during plant commissioning. 	<ul style="list-style-type: none"> Loss of assets (housing/livelihoods); and Injury or death either through fire, harmful fumes (Objective 1) 	Where Company requires, Contractor shall assess the level of local fire fighting capacity and whether equipment is available for use in the event of a Project-related emergency. Contractor shall acquire fire fighting capacity (may include pumps, water supplies, trucks, and training for personnel) if insufficient capacity is available.	22.007	Verification	Prior to Project commencement and ongoing	Contractor

Source of Impact	Potential Impact and Relevant Management Plan Objective†	Mitigation and Management (Design Feature/ Specific Measure)	ID	Monitoring	Monitoring Frequency	Responsibility
Emergency Services and Response <ul style="list-style-type: none"> Capacity for emergency response. 	Response to Project-related emergency situations (environmental hazard, accident, etc.) (Objectives 1 and 3)	Company shall provide relevant third parties (i.e., those currently providing emergency response services) with information on the nature and extent of environmental and human health effects that may result from construction or consequential emergencies.	22.008	Verification	Prior to Project commencement and ongoing	Contractor and/or Company
		Contractor shall design Emergency Management Plans for Project-related emergency events inside and outside Company boundary. Emergency Management Plans should include detailed measures to safeguard the health and safety of workers and the communities in the event of a Project-related emergency.	22.009	Verification	Prior to Project commencement and ongoing	Contractor
		Relevant Emergency Management Plans must be communicated to the community in a manner that will be understood and in accordance with Community Engagement Management Plan.	22.010	Verification	Prior to Project commencement and ongoing	Contractor
	Lack of capacity of local emergency services (Objective 1)	Contractor shall assist and collaborate with the community and local government agencies in preparations for effective response to Project-related emergencies. If local government agencies have little or no capacity to respond effectively, Contractor shall be responsible in preparing for and responding to Project-related emergencies.	22.011	Verification	Prior to Project commencement and ongoing	Contractor
		Contractor shall document its emergency preparedness and response activities, resources, and responsibilities. Contractor shall disclose appropriate information in the Emergency Management Plan (or other relevant documents) to affected communities and relevant government agencies. Documents and relevant measures shall be revised and updated as necessary to reflect changed circumstances; affected third parties shall participate / be informed as appropriate.	22.012	Verification	Prior to Project commencement and ongoing	Contractor

Source of Impact	Potential Impact and Relevant Management Plan Objective†	Mitigation and Management (Design Feature/ Specific Measure)	ID	Monitoring	Monitoring Frequency	Responsibility
		<p>Emergency Management Plans should address the following aspects of emergency response and preparedness, as a minimum:</p> <ul style="list-style-type: none"> • Specific emergency response procedures; • Trained emergency response teams; • Emergency contacts and communication systems / protocols; • Procedures for interaction with local and regional emergency and health authorities; • Permanently stationed emergency equipment and facilities (e.g. first aid stations, fire extinguishers/hoses, sprinkler systems), if appropriate; and • Where appropriate, protocols for fire truck, ambulance and other emergency vehicle services. 	22.013	Verification	Prior to Project commencement and ongoing	Contractor
Security Forces	<p>Insufficient training and control of security force can lead to excessive use of force while protecting Project personnel and assets. (Objective 1)</p>	<p>Contractor shall follow Company's Framework on Security and Human Rights which require compliance with the Voluntary Principles on Security and Human Rights. The Project shall, to the extent possible, establish that private security personnel have not participated in past human rights abuse, have been appropriately trained in the use of force and conduct toward workers and the local community, and require them to act within the applicable law. The Project shall investigate any credible allegations of unlawful behaviour or acts of abuse by private security personnel and take action (or urge appropriate parties to take action) to prevent recurrence.</p>	22.014	Verification	Ongoing	Contractor/Company

† See Section 1.s

Table 2: Links with other Plans

Source of Impact	Potential Impact and Relevant Management Plan Objective†	Relevant Plans
Grievances	Community disaffection due to unrealised expectations, unheeded concerns and lack of knowledge of Project operations and potential impacts or a response to actual damage or harm caused by a project failure to adequately mitigate adverse affects or anticipate the adverse consequences of its activities. (Objectives 1 and 2)	The Company Stakeholder Engagement Plan (SEP), and specifically the Community Party Grievance Procedure.
Managing local expectations for employment, contracting and corporate support.	Community disaffection due to unrealised expectations. (Objective 1 and 3)	Labour & Worker Conditions Management Plan. Camp Management Plan. Procurement & Supply Management Plan. Stakeholder Engagement Plan.
Water (quality and amount) <ul style="list-style-type: none"> • Abstraction of water for construction and operations of Company and its associated infrastructure, including accommodation camps; and • Contamination of water sources. 	Reduction in quality, volume and reliability of water supply resulting in community disadvantage, health impacts and resentment of Project activities. (Objective 1)	Water Management Plan. Community Health & Safety Management Plan. Camp Management Plan. Community Infrastructure Management Plan.
Noise and vibration <ul style="list-style-type: none"> • Construction activity - plant and equipment operational noise; • Plant commissioning; • Vehicle traffic (peak timing); and • Blasting operations. 	General annoyance and reduced quality of life <ul style="list-style-type: none"> • Blasting operations have the potential to attract members of the communities to the source of the noise - which may result in injury; • Damage to buildings due to vibration; and • May scare livestock and wildlife (and hence potential food sources). (Objective 1)	Noise & Vibration Management Plan.
Improved road conditions	Increased traffic volumes and traffic speed <ul style="list-style-type: none"> • Increased population trauma associated with accidents. (Objective 1)	Community Health & Safety Management Plan. Community Infrastructure Management Plan.
	Increased mobility on improved roads can exacerbate tribal fighting, violence, and the spread of disease. (Objective 1)	Community Health & Safety Management Plan.
	Increased shipping traffic (rivers, sea) causing disruption of movements and potential accidents (e.g. canoes tipping over in shipping wake). (Objective 1 and 3)	Community Infrastructure Management Plan.

Source of Impact	Potential Impact and Relevant Management Plan Objective†	Relevant Plans
Air quality - Dust <ul style="list-style-type: none"> Operation of materials production and handling equipment; Movement of construction equipment; and Traffic generated from sealed and unsealed roadways. 	Health impacts, despoiling of community assets (e.g. housing, crops) and gardens. (Objective 1)	Air Emissions Management Plan.
Air quality - Emissions <ul style="list-style-type: none"> Vehicle exhaust emissions; and Stationary engine exhaust (generators). 	Health impacts resulting from impaired air quality. (Objective 1)	Air Emissions Management Plan. Community Health & Safety Management Plan. See also Table 1
Waste <ul style="list-style-type: none"> Construction site waste materials (e.g. building materials, fill etc.); Accommodation camp waste; and Machining workshop waste (oils, filters, batteries etc.). 	Ground and surface water contamination affecting community and environmental health (potential livelihood aspect). Misuse of discarded items. Clan / tribal clashes over salvage rights. (Objective 1)	Waste Management Plan. Camp Management Plan. Community Health & Safety Management Plan.
	Increase in vermin attracted to landfill sites, resulting in health impacts. (Objective 1)	Weed, Plant Pathogen & Pest Management Plan. Camp Management Plan. Community Health & Safety Management Plan.
Spills <ul style="list-style-type: none"> Storage and refuelling facilities; Vehicle and machinery servicing facilities; and Transportation. 	Health and safety arising from the release of harmful vapours or contamination of soil, groundwater and surface water. (Objective 1)	Spill Prevention & Response Plan. Community Health & Safety Management Plan.
Hazardous Materials transport <ul style="list-style-type: none"> Fuel, lubricant and chemicals transportation (including wastes); and Explosives transportation. 	Should a spill occur land and water contamination may cause: <ul style="list-style-type: none"> Injury during emergencies; Illness due to direct or indirect exposure; and Loss of livelihood. (Objective 1 and 2)	Hazardous Materials Management Plan. Community Health & Safety Management Plan. Spill Prevention & Response Plan.
Fire due to: <ul style="list-style-type: none"> Brush/forest clearing; Construction operations such as pipe welding, refuelling, machining, transport accident; and Accidents during plant commissioning. 	<ul style="list-style-type: none"> Loss of assets (housing/livelihoods); Injury or death either through fire, harmful fumes. (Objective 1)	Project Emergency Preparedness & Response Plan. Project Safety Plan. See also Table 1

Source of Impact	Potential Impact and Relevant Management Plan Objective†	Relevant Plans
Emergency Services and Response <ul style="list-style-type: none"> Capacity for emergency response. 	Strain on and lack of capacity of local emergency services. (Objectives 1 and 2)	Project Emergency Preparedness & Response Plan Project Safety Plan See also Table 1
Changes to Physical Environment	Disruptions to livelihoods systems (e.g. agriculture and fishing). Reduced residential and recreational amenity, physical and economic displacement. (Objective 1)	Reinstatement Management Plan. Erosion & Sediment Control Plan. Ecological Management Plan. Resettlement Action Plan.
Unrestricted movement of workers outside camps and Project worksites	Increased pressure on fish and wildlife populations. Reduced availability of local food sources (Objective 1)	Ecological Management Plan
Weeds and pests	Spread of disease through increase in vermin or insects, reduction in local species (especially those which have a significant cultural value) due to introduced species. Improper use of pesticides causing community impacts through depleting local (non-pest) species or contamination. (Objective 1)	Weed, Plant Pathogen & Pest Management Camp Management Plan.
Raw materials & produce availability (i.e., natural resource use and food security - this can be impacted by both the contractor's operations and in-migration relating to Company) (see also in-migration and price inflation).	Increased rate of extraction of raw materials for sale to Contractor (esp. timber) may affect subsistence and isolated communities for whom the cash economy will not readily provide a replacement for the goods. Restrictions on forest use. Reduced amount of traditional materials for house construction Conversely, communities may deplete their own supplies of produce in order to earn income at the expense of food security Reduced availability of traditional food. (Objective 1)	Raw Materials Management Plan. Ecological Management Plan.
Price distortions	Inflationary pricing due to increased employment income and potential issues due to Contractor/migrants purchasing locally, and where demand becomes greater than supply. (Objective 1)	Procurement & Supply Management Plan.
	Food security and nutritional status within communities may be positively or negatively impacted by Projects at both a household and community level. Significant food inflation may marginalise vulnerable populations. More land may be cleared for food production. (Objective 1)	Community Health & Safety Management Plan. Procurement & Supply Management Plan.

Source of Impact	Potential Impact and Relevant Management Plan Objective†	Relevant Plans
Tribe/Clan Interactions	Increase in non-local population due to employment opportunities. Conflict on worksites and through employment. (Objective 1)	Labour & Worker Conditions Management Plan. Camp Management Plan.
In-migration/ Population Growth	Population influx It is likely that people will be attracted to areas around the construction activities seeking employment and to sell goods and services. The likelihood of increased tribe/clan interactions exists and may exacerbate pre-existing conflicts or lead to new ones. Rapid population increase and density may occur - leading to overcrowding and establishment of squatter/informal settlements, limitation of supplies, inflation, enhanced economic disparity, decreased security, insufficient social amenity due to demand and pressure on public resources. (Objective 1)	Labour & Worker Conditions Management Plan. Camp Management Plan. Community Support Strategy.
Employment (see also in-migration due to seekers of direct and in-direct employment, also in-direct employment due to the multiplier effect).	Community disaffection at not having the requisite skills to meet Project employment opportunities. A positive impact of employment and training opportunities is the ability to gain transferable skills etc. (Objective 1)	Labour & Worker Conditions Management Plan. Community Support Strategy.
	Issues relating to increased expenditure on social vices and associated problems, due to a sudden increase in disposable income. (Objective 1).	Community Health & Safety Management Plan.
Contractor Interactions with Locals	Disturbance of local community resulting from the actions of contractors and site workers. (Objective 1)	Camp Management Plan. Project Code of Conduct referred to in the Labour & Worker Conditions Management Plan.
	Positive Impact - Interaction between workers and communities can be a positive benefit, bringing information and ideas to relatively isolated communities. (Objective 1)	Community Engagement Management Plan. SEP.
Gender & Vulnerable Groups	Lack of employment opportunities for women, employment discrimination. (Objective 1)	Labour & Worker Conditions Management Plan.
	Increase in sexual harassment due to higher wage expenditure on alcohol. (Objective 1)	Community Health & Safety Management Plan. Labour & Worker Conditions Management Plan.

5.0 ROLES AND RESPONSIBILITIES

Contractor shall ensure sufficient resources are allocated on an ongoing basis to achieve effective implementation of this Plan.

The Contractor Plan shall describe the resources allocated to and responsible for the execution of each task and requirement contained therein, and shall describe how roles and responsibilities are communicated to relevant personnel.

Company shall ensure sufficient resources are allocated on an ongoing basis to achieve effective implementation of Company's responsibilities in the Community Impact Management Plan.

6.0 TRAINING, AWARENESS AND COMPETENCY

Contractor shall ensure that all personnel responsible for the execution of the tasks and requirements contained within this Plan are competent on the basis of education, training and experience.

The Contractor Plan shall describe the training and awareness requirements necessary for its effective implementation.

Contractor's training activity associated with the Contractor Plan shall be appropriately documented by means of a training needs assessment, training matrix/plan and records of training undertaken.

Project shall ensure that personnel responsible for the execution of tasks and requirements in the Community Impacts Management Plan are competent on the basis of education, training and experience.

Project training activity associated with the Community Impacts Management Plan shall be appropriately documented by means of a training needs assessment, training matrix/plan and records of training undertaken.

7.0 PERFORMANCE INDICATORS

Table 3 outlines the indicators for measuring and verifying performance in relation to community impacts management. However Contractor may, subject to agreement with the Company, modify or add to these indicators to enhance the Contractor's Contractor Plan based on lessons from the performance indicators.

Table 3: Performance Indicators

ID #	Performance Indicator	Measurement	Internal Assessment Frequency*	Relevant Management Plan Objective†
1	Number of legitimate individual or community grievances relating to Contractor activities, categorised according to cause of grievance.	Complaint register which shows that the grievance is regarded as legitimate.	Quarterly#	1, 2
2	Project schedule delays due to community issues.	Number of blockages/ instances where communities prevent work or access to work sites.	Quarterly	1

* Frequency is determined by the Company and may vary subject to Contractor's performance.

† See Section 1.0.

The Company will report on this using the centralised grievance database and discuss performance with Contractor.

8.0 REPORTING AND NOTIFICATION

Contractor shall submit to the Company a monthly report addressing the performance indicators as prescribed in Table 3.

Other reporting or notifications required as part of the implementation of this Plan are summarised in Table 1.

ATTACHMENT 1

LEGAL AND OTHER REQUIREMENTS

Contractor shall comply with applicable Papua New Guinea (PNG) Laws and Regulations, applicable International Finance Institution requirements and applicable International Treaties and Conventions. In addition, Contractor shall comply with certain other requirements defined by the Company.

The following requirements form the basis of this Plan; however Contractor should not rely upon them as an exhaustive list of legal and other requirements.

PNG Laws & Regulations

PNG laws relevant to community impacts include:

- Industrial Safety (Building Works) Order 1967.

International Treaties and Conventions

Typically, international conventions and treaties mandate actions that the signatory countries must undertake and they do not require direct action by private companies, however some treaties and conventions may require direct action by private companies.

There are no international treaties and conventions of direct relevance to the construction phase from a community impacts perspective.

International Finance Institution Requirements

- International Finance Corporation (IFC) Performance Standard 1 covers Social and Environmental Assessment and Management Systems and relevant objectives are:
 - To avoid, or where avoidance is not possible, minimise, mitigate or compensate for adverse impacts on workers, affected communities, and the environment; and
 - To ensure that affected communities are appropriately engaged on issues that could potentially affect them.
- IFC Performances Standard 3 covers Pollution Prevention and Abatement and a relevant objective is:
 - To avoid or minimise adverse impacts on human health and the environment by avoiding or minimising pollution from project activities.
- IFC Performance Standard 4 covers Community Health, Safety and Security and a relevant objective is:
 - To avoid or minimise risks to and impacts on the health and safety of the local community during construction from both routine and non-routine circumstances.
- Performance Standard 5 covers Land Acquisition and Involuntary Resettlement and establishes requirements to make good/compensate for losses as a result of physical or economic displacement and to enhance or at least restore the livelihoods and standards of living of displaced persons.

International standards that will be followed by the Project, relevant to community impacts include:

- IFC General Environmental, Health and Safety Guidelines:
 - Environmental: 1.1 Ambient Air Quality – Mobile Sources – Land Based;

- Community Health & Safety and Safety: 3.1 Water Quality and availability, 3.4 Traffic Safety and 3.7 Emergency Response - Community Notification; and
- Construction and Decommissioning: 4.1 Noise & Vibration General, Air quality (dust) and 4.2 Confined Spaces and Excavations.
- IFC Industry Sector Guidelines, Onshore Oil and Gas Development:
 - 'Limit the amount of pipeline trench left open at any one time. Safety fences and other methods to prevent people or animals (e.g., livestock) from falling into open trenches should be constructed in sensitive locations and within 500m of human populations' (Section 1.1).

Other Requirements

Company will follow Company's Operations Integrity Management System (OIMS). The following OIMS elements apply to community impacts:

Element 2: Risk Assessment and Management

2.1. Risk is managed by identifying hazards, assessing consequences and probabilities, and evaluating and implementing prevention and mitigation measures.

2.2. Risk assessments are conducted for ongoing operations, for projects and for products in order to identify and address potential hazards to personnel, facilities, the public and the environment.

2.3 Periodic risk assessments are performed by qualified personnel.

Element 4: Information and Documentation

4.2 Information on the potential hazards of materials involved in operations is kept current.

4.3 Information on potential hazards associated with products, and guidance to enable proper handling, use and disposal, are documented and communicated.

Element 9: Incident Investigation and Analysis

9.1 A process is in place for reporting, investigating, analysing, and documenting actual safety, security, health, environmental and regulatory compliance incidents and significant near misses.

Element 10: Community Awareness and Emergency Preparedness

10.1 Community expectations and concerns about our operations, including those of the workforce, are recognized and addressed in a timely manner.

10.2 Emergency-preparedness and response plans are documented, accessible and clearly communicated.

10.3 Equipment, facilities and trained personnel needed for emergency response are defined and readily available.

10.4 Simulations and drills are periodically conducted, which include consideration of external communications and involvement.

Company will also follow Best Practices in External Affairs (BPEA) regarding Community Relations Management. The BPEA provides, "[w]herever Company operates around the world, we form collaborative partnerships and consult with community leaders to help build economic and social capacity that benefits communities and our business over the long term. Our BPEA initiative, which is part of our OIMS, is our strategic planning tool for global external affairs."

International standards that will be followed by Project, relevant to community impacts include:

- Voluntary Principles on Security and Human Rights.