

Esso Highlands Limited



Papua New Guinea LNG Project

**Environmental and Social Management Plan  
Appendix 20: Camp Management Plan**

PGGP-EH-SPENV-000018-024

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## ACRONYMS

Acronym	Definition
CP	Contractor Plan
EMP	Environmental Management Plan(s)
ESMP	Environmental and Social Management Plan
IFC	International Finance Corporation
ITT	Invitation to Tender
LNG	Liquefied Natural Gas
OIMS	Operations Integrity Management System
PDS	Project Design Specifications
PNG	Papua New Guinea
SEP	Company Stakeholder Engagement Plan

## KEY DEFINITIONS

**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.

**Camp:** Refers to temporary accommodation provided for the construction workforce. Camps include supporting facilities (including catering facilities, dining areas, washing and laundry facilities, recreation areas etc.) and supporting utilities to run the camp such as power and water supply.

**Closed camp/closed camp policy:** It is Project's policy to have closed camps this means public will not be allowed to enter the camp (unless authorised by Company) and workers staying at the camp will be restricted to the camp area at the end of shifts. The closed camp 'policy' is applicable for all workers, including those who live in the nearby area (unless authorised by Company)<sup>1</sup>.

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

**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.

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<sup>1</sup> Company may provide exceptions to closed camp policy for some camps such as pioneer and fly camps where it will be difficult to implement a closed camp policy. Prior agreement from Company is required for exception to the closed camp policy.

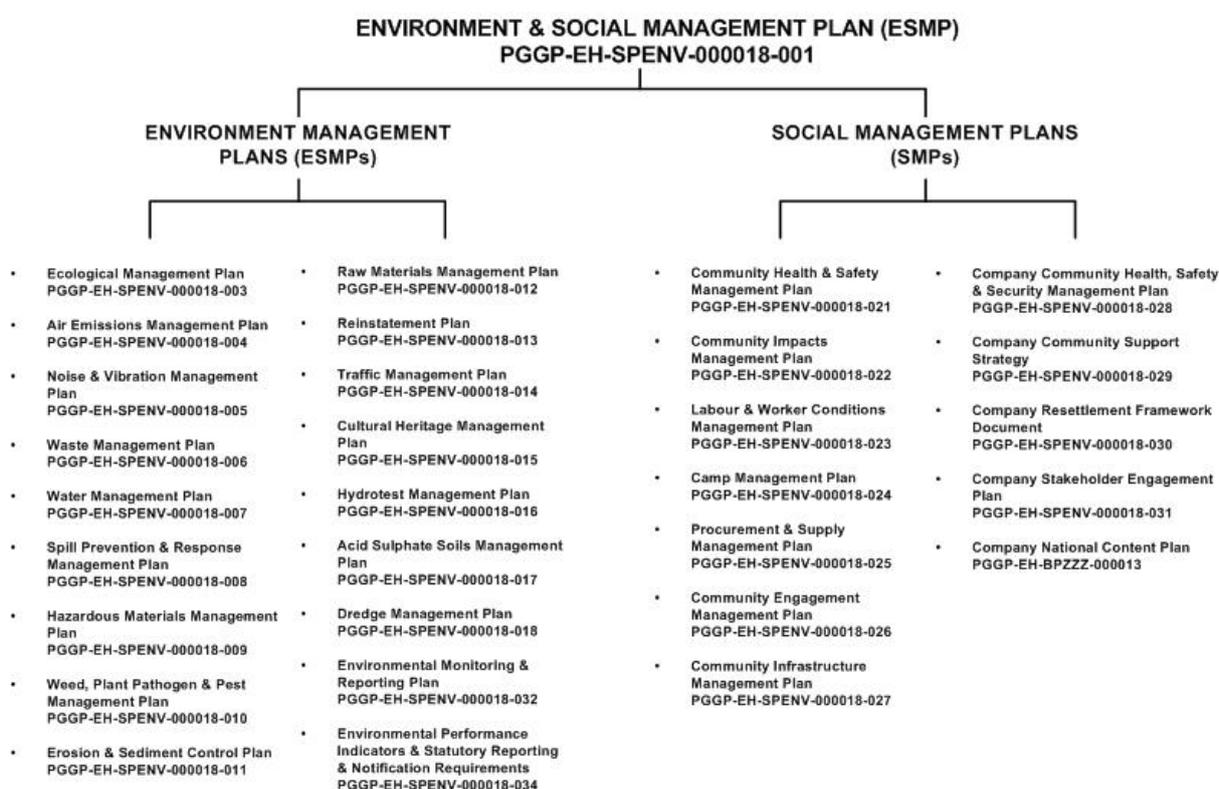
## 1.0 OBJECTIVES

Esso Highlands Limited (Company) has developed this Camp Management Plan as part of its Environmental and Social Management Plan (ESMP) outlining a range of mitigation measures designed to avoid or reduce undesired camp management 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 Camp Management Plan are:

- Avoid or reduce negative impacts on the community and maintain constructive relationships between local communities and workers' camps; and
- Establish standards on worker welfare and living conditions at the camps that provide a healthy, safe and comfortable environment.

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.



**Figure 1: Environment and Social Management Framework**

This Plan should also be read in conjunction with the following documents<sup>2</sup>:

- Minimum Health Requirements for Project Execution (PG-PDS 71-99-03);
- The Company Health Design Specifications for Projects (PG-PDS 71-01-01);
- Project Emergency Response Plan (PGGP-EH-SPSAF-000025);
- Project Security Management Plan (PGGP-EH-SPSEC-000003);
- Project System Design Philosophy (PGGP-EH-SBDES-0001); and

<sup>2</sup> These documents are also for use in managing Contractor obligations and Company may vary these to suit the needs of Project.

- Temporary Construction Camp Standards (PGHU-EH-SSPDS-000002).

## **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 the Project specifically in relation to implementation of this Plan. Survey results conducted as part of other Plans may be relevant.

## **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.

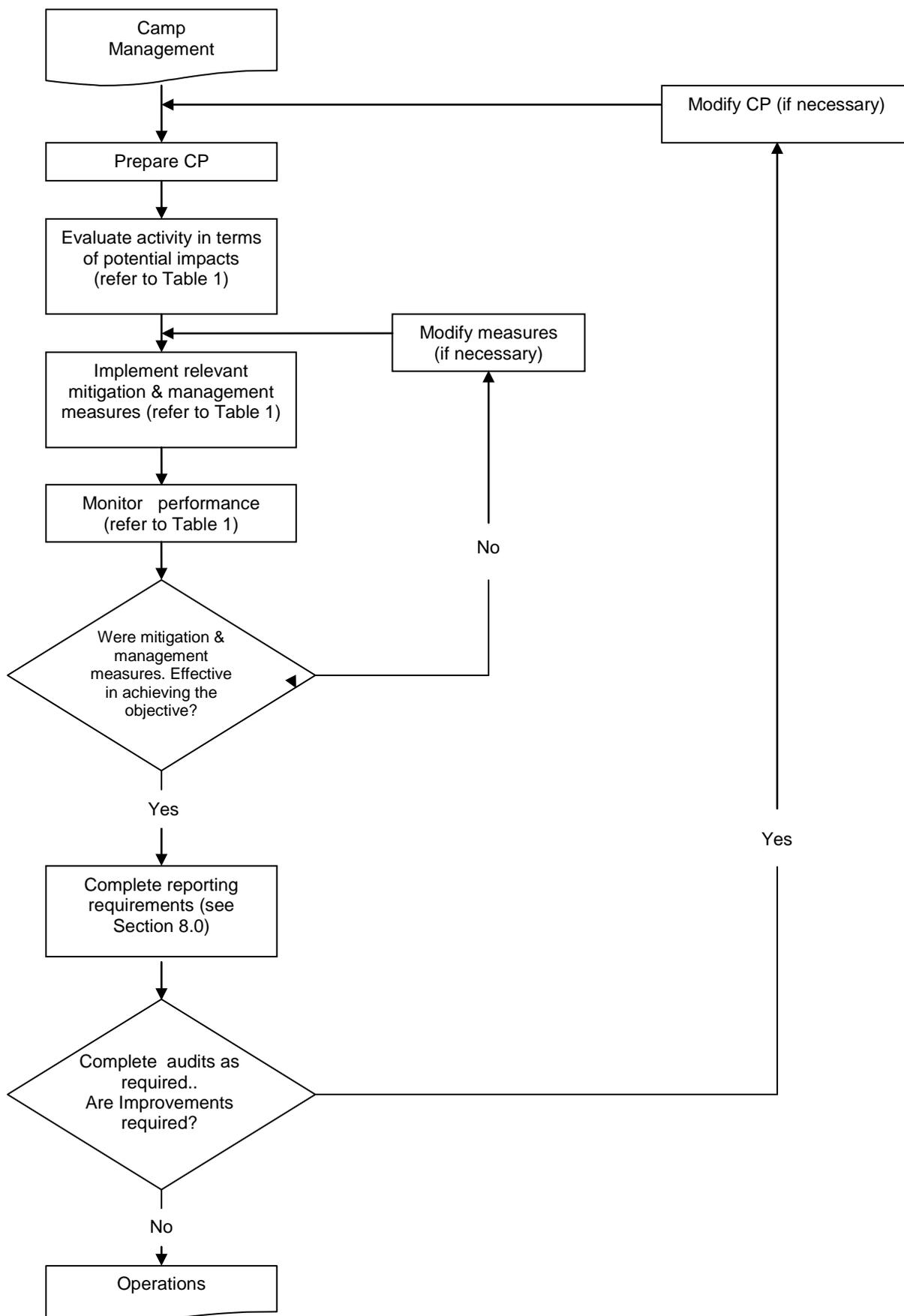


Figure 2: Camp Management Process

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

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

Monitoring to be undertaken as part of this Plan is described in Table 1. The 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.

**Table 1: Management and Monitoring**

Source of Impact	Potential Impact and Relevant Management Plan Objective	Mitigation & Management (Design Features & Specific Measures)	ID	Monitoring	Frequency	Responsibility
<b>Community Relations</b>	<p>Unauthorised movements of construction workers (during and after working hours) could result in trespassing, damage to local land and property and create amongst local residents a sense of their privacy being invaded.</p> <p>Residents may feel vulnerable and there may be increasing incidents of crime and or violence and threats to the safety of community members.</p> <p>Disparity of pay, increase in disposable income and potential availability of illegal substances, illicit or culturally inappropriate lifestyle choices, leading to increased tension between local communities and the workers at camps. (Objective 1)</p>	Contractor shall enforce a 'closed' camp policy unless otherwise agreed by Company <sup>3</sup> . Workers will be strictly prohibited from leaving camps for non-work related activities and interacting with the local community unless agreed by Company.	24.001	Monitoring	Ongoing	Contractor
		Contractor shall implement suitable measures to maintain the closed camp policy which may include perimeter security fences, security controls and guard houses, monitoring transfer of goods into and out of camps for contraband and stolen goods. Contractor should refer to the Project Security Management Plan.	24.002	Verification	Every 3 months	Contractor
		Contractor, as appropriate, shall provide adequate recreation facilities for workers to reduce incentive for leaving camps during leisure time.	24.003	Verification	Every 6 months	Contractor
		Contractor shall limit workers interaction with the community when outside the camp e.g., by organising transport directly to and from the worksite.	24.004	Verification	Ongoing	Contractor
		If community members or local businesses express grievances in relation to camp related activities/operations, the Project shall respond to the grievance in accordance with the Community Grievance Procedure contained in the Stakeholder Engagement Plan (SEP).	24.005	Notification	Ongoing	Contractor and/or Company
		Company may request that camp related activities/operations be amended to address community grievances. Contractor shall comply with these requests.	24.006	Verification	Ongoing	Contractor and/or Company
		Workers shall abide by camp rules which includes a disciplinary process.	24.007	Verification	Every 3 months	Contractor and/or Company
		The Project shall, be cognisant of the environment in which it works and shall, where practicable, respect local cultural events such as religious events, funerals and the like.	24.008	Verification	Ongoing	Contractor and/or Company

<sup>3</sup> Company may provide exceptions to closed camp policy for some camps such as pioneer and fly camps where it will be difficult to implement a closed camp policy. Prior agreement from Company is required for exception to the closed camp policy.

Source of Impact	Potential Impact and Relevant Management Plan Objective	Mitigation & Management (Design Features & Specific Measures)	ID	Monitoring	Frequency	Responsibility
		<p>The Project shall provide training to all workers, national and expatriate on camp management including:</p> <ul style="list-style-type: none"> <li>• A briefing on camp rules, including closed camp policy, behaviour between fellow workers and the community;</li> <li>• Procedures for dealing with camp related complaints, worker issues and community issues (as per Stakeholder Engagement Plan, SEP); and</li> <li>• Community relations orientation. The objective of this orientation will be to increase awareness about the local area and cultural sensitivities.</li> </ul>	24.009	Verification	Every 3 months	Contractor and/or Company
<b>Health</b>	<p>Potential interaction between workers, persons engaged in illicit activities and the community increases the risk of spreading communicable diseases, particularly in more remote communities. (Objective 1)</p>	<p>Contractor shall comply with the Minimum Health Requirements for Project Execution and the Community Health and Safety Management Plan which set out requirements and management measures on controlling communicable diseases within camps and to outside communities.</p>	24.010	Verification	Every 3 months	Contractor
		<p>Contractor shall enforce the closed camp policy to limit interaction with community<sup>1</sup></p>	24.011	Verification	Ongoing	Contractor
	<p>Camp operations have the potential to develop favourable conditions for weeds, pests and disease, which could impact the health of workers and the community, as well as affect community livelihoods (e.g. rodent infestation affecting crops). (Objective 1)</p>	<p>The Project shall comply with the Weed, Plant Pathogen and Pest Management Plan to prevent exotic weeds, plant pathogens and pests from entering the Project areas (including camps) and spreading outside of those areas.</p>	24.012	Verification	Every 3 months	Contractor and/or Company
<b>Waste Management, Pollution and Environmental Impacts</b>	<p>Camp has the potential to have off site pollution impacts from waste disposal, emissions and spills. Camp operations may also cause environmental issues including deteriorating water quality, erosion, sedimentation, noise and air quality issues. These factors have the potential</p>	<p>Contractor shall exercise all reasonable due diligence to conduct its operations in a manner that will minimize pollution.</p>	24.013	Verification	Ongoing	Contractor
		<p>Contractor shall comply with the Waste Management Plan and Hazardous Materials Management Plan which define requirements to contain, transport, handle and dispose of camp wastes and hazardous materials to avoid impacts to human health and the environment.</p>	24.014	Verification	Ongoing	Contractor

Source of Impact	Potential Impact and Relevant Management Plan Objective	Mitigation & Management (Design Features & Specific Measures)	ID	Monitoring	Frequency	Responsibility
	to affect the community if not adequately managed. (Objective 1)	Contractor shall also apply appropriate management controls set out in the Spill Prevention and Response; Erosion and Sediment Control; Water; Air Emissions; and Noise and Vibration Management Plans for camps.	24.015	Notification		Contractor and/or Company
<b>Community Resources</b>	Any infrastructure, services or resources used by camps (e.g. water abstraction) that result in reductions/ shortage/interruptions for the local community will have a negative impact. (Objective 1)	Contractor shall utilise water sources for camp use in a manner that minimises impacts on local supply and use. Freshwater sources used by the Contractor should be reviewed and accepted by Company, as per Water Management Plan.	24.016	Verification	Prior to establishment of camp	Contractor and/or Company
		The Project shall routinely monitor quality and supply of water source used by camp (refer Water Plan).	24.017	Ongoing	Every 3 months	Contractor
	There is potential for social envy and increased resentment from the community towards the Project and project team if camp facilities are perceived to be superior to those in the community. Services of note include camp health facilities, power supply, clean running water. Restricted ability to access these services may increase frustration at the level of the services available to them. (Objective 1)	Company will implement the National Content Plan and the Company Community Support Strategy which identifies strategic community investments including in the area of health.	24.018	Verification	Annual	Company
<b>Procurement and Supply of Goods</b>	Increased demand for food and other provisions may deplete natural resources e.g., firewood, timber, game, fisheries, etc potentially causing shortages of supply in the local community, and/or increasing the price of goods, affecting affordability for local communities. (Objective 1)	The Project shall not purchase products in the local community unless through formal contracts with approved suppliers.	24.019	Verification	Ongoing	Contractor and/or Company
		The Project shall adopt management measures identified in the Procurement and Supply Management Plan and Community Impacts Management Plan.	24.020	Verification	Ongoing	Contractor and/or Company

Source of Impact	Potential Impact and Relevant Management Plan Objective	Mitigation & Management (Design Features & Specific Measures)	ID	Monitoring	Frequency	Responsibility
Camp Location	Siting of camps may result in displacement of residents, loss of productive lands and the resources upon these lands. Camps may also restrict or impede access to areas for the local community. (Objective 1)	Potential camp locations will be selected in consultation with Company and affected communities will be subsequently consulted.	24.021	Verification	Prior to establishing the camp	Contractor and/or Company
	Construction camps may result in a noticeable increase in traffic, noise, air emissions and light intrusion which could negatively affect the amenity and lifestyle of nearby communities and pose a potential safety issue. (Objective 1)	The Project shall refer to those Environmental Management Plan's (EMP) that include mitigation/avoidance measures that relate to the local community, including: <ul style="list-style-type: none"> <li>• Noise and Vibration Management Plan;</li> <li>• Air Emissions Management Plan; and</li> <li>• Waste Management Plan.</li> </ul>	24.022	Verification	Ongoing	Contractor and/or Company
In-migration	There is a strong likelihood of in-migration into areas around the construction camps. People from	Contractor shall enforce a 'closed' camp policy unless otherwise agreed by Company. This is intended to deter individuals setting up near camp.	24.023	Verification	Ongoing	Contractor

Source of Impact	Potential Impact and Relevant Management Plan Objective	Mitigation & Management (Design Features & Specific Measures)	ID	Monitoring	Frequency	Responsibility
	<p>outside of the local area may migrate into existing settlements or develop new settlements in proximity to camps and the Project area. Existing communities may also relocate to be closer to camps. In-migration can result in disputes and sometimes violence between the new settlers and the resident community. Migrants moving into existing settlements may increase demand and inflate prices for housing, goods and services. Increased population and development of new and uncontrolled settlements increase pressure on infrastructure, services and resources. The increased traffic from in-migration may also result in greater theft and smuggling of goods. (Objectives 1 &amp; 2)</p>	<p>For other mitigation measures, refer to in-migration section of the Labour and Worker Conditions Management plan, Procurement and Supply Management Plan and Company Community Support Strategy.</p>	24.024	Verification	Ongoing	Contractor and/ or Company

Source of Impact	Potential Impact and Relevant Management Plan Objective	Mitigation & Management (Design Features & Specific Measures)	ID	Monitoring	Frequency	Responsibility
<b>Worker Welfare and Living Conditions</b>	Construction workers living in camps may encounter stresses and discomforts that negatively impact their health and welfare. These stressors or discomforts may be caused by: <ul style="list-style-type: none"> <li>Poor living conditions (accommodation, ablution and sanitary, health, recreation catering and laundry).</li> </ul> (Objective 2)	Contractor shall comply with minimum standards for camp buildings, facilities and services cited in PNG Law and the Project Invitation to Tender (ITT) requirements (including Project Design Specifications - Health Design Specifications for Projects, Minimum Health Requirements for Project Execution, Security Systems Design Philosophy and Temporary Construction Camp Standards). Standards covered include but are not limited to: <ul style="list-style-type: none"> <li>Building requirements;</li> <li>First aid facilities and services;</li> <li>Sanitary and ablution facilities;</li> <li>Entertainment and recreation facilities and services;</li> <li>Communication services;</li> <li>Food and canteen facilities and services;</li> <li>Accommodation requirements; and</li> <li>Laundry facilities.</li> </ul>	24.025	Verification	Ongoing	Contractor
		Occupational Safety and Health Administration's (United States ) <i>Temporary Labour Camps Regulation</i> -(no. 1910.142) provides standards on buildings, facilities and services in temporary labour camps and it is required that the Contractor refer and abide to these standards in instances where requirements are not specified in the above documents.	24.026	Verification	Ongoing	Contractor
	<ul style="list-style-type: none"> <li>There is potential for resentment if living conditions of PNG or other country nationals are of a lesser standard than expats.</li> </ul> (Objective 2)	Where there is a difference in camp accommodation, Contractor shall manage this issue in an open and transparent manner. No reduction in standards shall be allowed because of worker's race, gender or nationality, although distinctions may be appropriate based on seniority of individuals and job classifications.	24.027	Verification	Every 6 months	Contractor
	<ul style="list-style-type: none"> <li>Cultural issues (nationality, religion, discrimination and harassment, etc.).</li> </ul>	Contractor may provide prayer rooms and other facilities, as necessary and to the extent practicable, to satisfy the religious needs and customs of its workforce.	24.028	Verification	Ongoing	Contractor

Source of Impact	Potential Impact and Relevant Management Plan Objective	Mitigation & Management (Design Features & Specific Measures)	ID	Monitoring	Frequency	Responsibility
	(Objective 2)	Contractor's personnel shall not engage in any discrimination or harassing behaviour. Contractor shall establish an Equal Opportunity Policy to promote non-discrimination in accordance with Labour and Worker Conditions Management Plan.	24.029	Verification	Ongoing	Contractor
		Contractor shall implement a worker grievance procedure to address grievances between workers. Refer to the Worker Grievance section of the Labour and Worker Conditions Management Plan.	24.030	Verification	Ongoing	Contractor
	<ul style="list-style-type: none"> <li>Mental health issues (morale, isolation, family attachments, boredom).</li> </ul> (Objective 2)	Camps will be treated as closed camps. Camp rules in relation to alcohol consumption and drug prohibition will be complied with.	24.031	Verification	Ongoing	Contractor
		Contractor shall provide recreational facilities where practicable. In addition, Contractor will provide counselling for all workers, with no discrimination by race, sex or religion.	24.032	Verification	Every 6 months	Contractor
	<ul style="list-style-type: none"> <li>Personal security (crime, and emergencies).</li> </ul> (Objective 2)	Camps will be controlled by security to avoid intrusions from outside community.	24.033	Verification	Every 3 months	Contractor
		Work Site Security Plan to be developed by Contractor shall include security measures to be provided at the camps which may include fencing, locks, alarms, pass card systems, badge and pass system, access points, safe transport of personnel as appropriate.	24.034	Verification	Every 3 months	Contractor
		Contractor shall develop an Emergency Response Plan that meets requirements set out in the ITT package.	24.035	Verification	Prior to establishing the camp	Contractor
	<ul style="list-style-type: none"> <li>Environmental stress (climate, noise etc.).</li> </ul> (Objective 2)	Contractor shall comply with the Minimum Health requirements for Project Execution PDS and Health Design Specifications for Projects, in addressing environmental factors including: <ul style="list-style-type: none"> <li>Accommodation will be designed to suit climatic conditions;</li> <li>Accommodation and surroundings shall be constructed so that noise does not interfere with sleep to the extent that is reasonably practicable; and</li> <li>Health and hygiene inspections of facilities as per the above PDS.</li> </ul>	24.036	Verification	Ongoing	Contractor

Source of Impact	Potential Impact and Relevant Management Plan Objective	Mitigation & Management (Design Features & Specific Measures)	ID	Monitoring	Frequency	Responsibility
Decommissioning	Decommissioning of camps has several potential impacts: <ul style="list-style-type: none"> <li>Local employment and provision of local goods and services at camps will no longer be required;</li> <li>Locals employed and previously accommodated in camps will no longer have access to services and benefits available at camps (e.g. health services, recreation facilities); and</li> <li>Infrastructure which provides benefits to communities may no longer be maintained (e.g. roads) and may be decommissioned and removed or reinstated (e.g. access tracks).</li> </ul> (Objective 2)	Contractor is to follow the retrenchment procedure discussed in the Labour and Worker Conditions Management Plan.	24.037	Verification	Ongoing	Contractor
		Where Community requests, some infrastructure and services may be retained at the discretion of Company:	24.038	Verification	Ongoing	Contractor/ Company
		<ul style="list-style-type: none"> <li>Disturbed areas will be reinstated as per the Reinstatement Plan;</li> <li>Where practicable, Contractor will return camp areas to former landforms;</li> <li>No facilities will be maintained in or near especially environmentally or socially sensitive areas; and</li> <li>Where there are negative consequences of induced access, the facility will also be decommissioned and the area reinstated.</li> </ul>	24.039	Verification	Ongoing	Contractor

## 5.0 ROLES AND RESPONSIBILITIES

Contractor shall ensure sufficient resources are allocated on an ongoing basis to meet the requirements 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 Camp 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 Camp Management Plan are competent on the basis of education, training and experience.

Project training activity associated with the Camp 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 2 outlines the indicators for measuring and verifying performance in relation to camp management. However Contractor may, subject to agreement with Company, modify or add to these indicators to enhance the Contractor Plan based on lessons from the performance indicators.

**Table 2: Performance Indicators**

ID #	Performance Indicator	Measurement	Internal Assessment Frequency*	Relevant Management Plan Objective†
1	Camp Management Training participation	100% of workers resident at camp undergo training on camp management.	Monthly	1,2
2	Company satisfaction with Camp Management	An 80% compliance with the standards outlined in the Company Camp Monitoring Plan (contained in the Temporary Construction Camp Standard).	Monthly	1,2
3	Worker satisfaction with living conditions	Number of workers' grievances related to camp management.	Monthly	2

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

† See Section 1.0.

## 8.0 REPORTING AND NOTIFICATION

Contractor shall submit to Company a monthly report addressing the performance indicators (see Table 2).

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 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 law relevant to camp management includes:

- Employment Act 1978.

#### **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 relevant to the construction phase from a Camp Management perspective.

#### **International Finance Institution Requirements**

International Finance Corporation (IFC) Performance Standard 4 covers Community Health, Safety and Security and its objectives are to:

- Avoid or minimize risks to and impacts on the health and safety of the local community during construction from both routine and non-routine circumstances; and
- Ensure that the safeguarding of personnel and property is carried out in a legitimate manner that avoids or minimizes risks to the community's safety and security.

Requirement 6 of this Performance Standard states "*The client will design, construct, operate and decommission the structural elements or components of the project in accordance with good international industry practice.*"

In addition, IFC Performance Standard 2 covers Labour and Working Conditions and its objectives are to:

- To establish, maintain and improve the worker-management relationship;
- To promote the fair treatment, non-discrimination and equal opportunity of workers, and compliance with national labor and employment laws; and
- To promote safe and healthy working conditions, and to protect and promote the health of workers.

#### **Other Requirements**

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

##### Element 3: Facilities Design and Construction

3.3 The design and construction of new or modified facilities use approved design practices and standards that:

- Meet or exceed applicable regulatory requirements;

- Embody responsible requirements where regulations do not exist; and
- Address other important considerations, including security and Human Factors.

#### Element 6: Operations and Maintenance

6.1 Operating, maintenance and inspection procedures are developed and implemented.

#### 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.

The Project will also follow Company's 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.*"