TAP ITALY ESMS OFFSHORE SPILL PREVENTION AND RESPONSE CCP

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1 Abbreviations and definitions

The following table provides definitions of acronyms and a glossary of terms used in this document.

Table 1-1 Abbreviations and definitions

ALARP	As Low As Reasonably Practicable
Battery Limit Point Italy	The location of the first dry weld of the pipeline in Italy (i.e. the dry weld closest to the sea)
CCP	Contractor Control Plan
Coastal areas	Areas located between the Battery Limit Point Italy and Mean High Water Springs (MHWS)
COMPANY	TAP AG
CONTRACTOR	Construction contractors for Italy
Cultural heritage impact	A change to cultural heritage (in this context “cultural heritage” refers to any tangible (e.g. objects, artefacts, structures, spaces) or intangible element which is of value or importance to people’s culture, history and/or identity) which has occurred as a result of Project activities. Impacts may be considered to be positive or negative.
EBRD	European Bank for Reconstruction and Development
EEZ	Exclusive Economic Zone (offshore area extending a maximum of 200 nautical miles beyond territorial waters)
EHS	Environment, Health and Safety
Environmental impact	A change to the environment (in this context the “environment” refers to any aspect of the natural or semi-natural physical environment (air, water, soil etc.)) which has occurred as a result of Project activities. Impacts may be considered to be positive or negative.
ERC	Environmental Response Crew
ERP	Emergency Response Plan
ESIA	Environmental and Social Impact Assessment
ESIP	Environmental and Social Implementation Plan

ESMS	Environmental and Social Management System
EU	European Union
FOC	Fibre Optic Cable
IFC	International Finance Corporation
KP	Kilometre Point relating to the pipeline route as per the base case described in the ESIA Italy. It is possible that the KP locations will change because of a re-routing
Marine areas	Areas located between Mean High Water Springs (MHWS) and the Italy-Albania median line
MARPOL	International Convention for the Prevention of Pollution from Ships
Median line	An agreed marine territorial boundary separating the Exclusive Economic Zones (EEZs) of 2 or more countries
MHWS	Mean High Water Springs The mean average of the highest levels that spring tides reach over two successive high waters during those periods of 24 hours when the range of the tide is at its greatest, taken over a period of time (typically 19 years). MHWS is considered the point on this project that delineates between marine and coastal areas, which are both considered in the offshore CCPs
Microtunnel	A 3m diameter tunnel extending across the Italian landfall (approximately 1,485 m in length). The microtunnel allows the installation of the pipeline in the landfall area without the need to excavate a trench
MLWS	Mean Low Water Springs The mean average of the lowest levels that spring tides reach over two successive low waters during those periods of 24 hours when the range of the tide is at its greatest, taken over a period of time (typically 19 years)
MSDS	Material Safety Data Sheets
Nearshore	For the purposes of these CCPs, the nearshore marine area in the vicinity of the pipeline landfall is defined as the area seaward from Mean Low Water Springs (MLWS) to approximately 10 m water depth
Offshore areas	Areas located between the Battery Limit Point Italy and the Italy-Albania median line, inclusive of both coastal and marine areas
OSCP	Oil Spill Contingency Plan

Pipeline	Proposed pipeline scheme (TAP) including related facilities such as access roads etc.
PPE	Personal Protective Equipment
Project	Proposed pipeline scheme that will bring natural gas from the Caspian region to Western and South-Eastern Europe (TAP)
Socio-economic impact	A change to the existing socio-economic environment (in this context the "socio-economic environment" refers to the combination of any existing social and economic factors) which has occurred as a result of Project activities. Social factors may include aspects such as demographics, health and wellbeing etc. and may refer to individuals, groups or wider communities of people. Economic factors may include aspects such as employment, finances, livelihoods etc. An impact may be considered to be positive or negative.
SOPEP	Ship Oil Pollution Emergency Plan
TAP	Trans Adriatic Pipeline
TAP AG	Trans Adriatic Pipeline joint venture company

1.1 Defining "offshore", "coastal" and "marine" areas

This Contractor Control Plan (CCP) applies to all offshore areas that might be affected by the Project in Italy. "Offshore" areas include both "coastal" and "marine" areas, which are defined as follows:

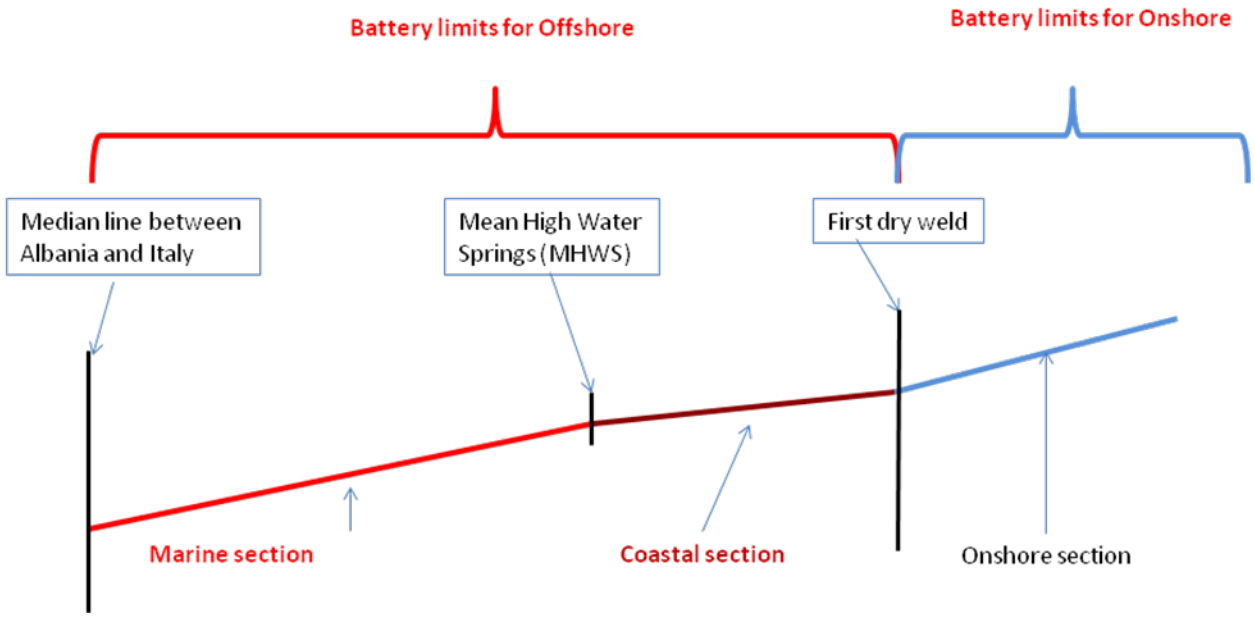
"Coastal" areas are defined as all areas located between the Battery Limit Point Italy (i.e. the location of the first dry weld) and the Mean High Water Springs (MHWS)[1]. For further information on the Battery Limit Point location see the TAP Battery Limits Onshore – Offshore Sections (CPL00-ENT-100-F-DFO-0002).

"Marine" areas are defined as all areas located between MHWS and the Italy-Albania median line.

[1] In the case of the Italian landfall, pipeline construction using a microtunnel complicates the issue. Work sites within marine and coastal areas are further clarified in Section 2.2.

"Offshore" areas include both the marine and coastal areas, and therefore include all areas located between the Battery Limit Point Italy and the Italy-Albania median line.

Figure 1 Marine, coastal and onshore limits



2 Introduction

This CCP identifies the commitments made in relation to offshore spill prevention and response during the construction and commissioning phase of the Project in Italy and describes the COMPANY's requirements of CONTRACTOR in terms of meeting these commitments (IT0263). Where a specific commitment from the Italy Commitments Register is described in this CCP, it is followed by its reference number as stated in the Project Commitment Register Italy (e.g. IT0012). Additional requirements have been included within this CCP where they are deemed to be internationally accepted or best practice. These additional requirements are not followed by a reference number.

As part of its planning and readiness for construction, CONTRACTOR is required to prepare its own specific Environmental and Social Implementation Plans (ESIPs) setting out how it intends to meet and comply with specific Project commitments set out in each CCP developed by the

COMPANY. This CCP shall act as a reference from which CONTRACTOR shall prepare an Offshore Spill Prevention and Response ESIP.

Deviations that involve measures different from those contained in this CCP will only be permitted upon approval of the COMPANY.

The Contractor's ESMS Framework Document (CAL00-RSK-601-Y-TTM-0001) provides an explanation of the linkage between CCPs and ESIPs.

This Offshore Spill Prevention and Response CCP should be implemented in conjunction with the Offshore Pollution Prevention CCP (IAL00-RSK-601-Y-TTM-0015). This CCP deals with training, equipment and response required to deal with a pollution event. The Offshore Pollution Prevention CCP (IAL00-RSK-601-Y-TTM-0015) deals with measures required to prevent a pollution event occurring.

2.1 Objectives

This CCP has been prepared to define the management measures necessary to ensure that the possibility of spill occurrence is reduced to as low as reasonably practicable (ALARP[2]) and that, should a spill occur, the effects are mitigated as far as possible by providing appropriate and efficient response procedures, carried out by trained personnel, and that equipment is readily available to deal with a spill during the construction phase of the offshore sections of the Project in Italy. The objective of this CCP is to ensure that all offshore spill prevention and response management measures comply with the commitments made in the Project Italy ESIA and international best practice.

[2] For a risk (or impact) to be ALARP it must be possible to demonstrate that the cost involved in reducing the risk/impact further would be grossly disproportionate to the benefit gained. The ALARP principle arises from the fact that infinite time, effort and money could be spent on the attempt of reducing a risk/impact to zero. It should not be understood as simply a quantitative measure of benefit against detriment. It is more a best common practice of judgment of the balance of risk and societal benefit.

2.2 Scope

This CCP defines COMPANY requirements (i.e. the commitments and best practice) in offshore spill prevention and response management that CONTRACTOR shall implement during construction, including hydrotesting and commissioning.

The scope of this CCP includes:

- emergency response equipment
- emergency response personnel
- emergency response exercises
- spill response (covering minor, major and crisis tier spills)
- clean up and repair.

Reporting and investigation processes are discussed in the Contractor's ESMS Framework document (CAL00-RSK-601-Y-TTM-0001).

Monitoring and inspection requirements related to this CCP are detailed in the Offshore Compliance Monitoring CCP (IAL00-RSK-601-Y-TTM-0023).

This CCP applies to all offshore areas that might be affected by the Project in Italy, including both coastal and marine areas. For a further definition as to what is defined as a "offshore", "coastal" and "marine" area, and their respective limits, see Section 1.1.

The marine areas within the scope include but are not limited to the following:

- the microtunnel
- the marine pipeline route/trench and immediately surrounding area
- the fibre optic cable (FOC) route/trench and immediately surrounding area
- Italian territorial waters and Exclusive Economic Zone (EEZ) (in terms of the potential extent of any marine impacts as a result of Project offshore construction activities).

The coastal areas within the scope include but are not limited to the following:

- the temporary worksite for the construction of the microtunnel

- the working strip for approx. 100m of terrestrial pipeline from the Battery Limit Point Italy to the start of the microtunnel
- any roads (including access roads, dirt tracks and public roads), aggregate extraction sites, spoil disposal sites, batch plants, temporary material and waste storage areas, pipe yards, maintenance areas located within the coastal area.

CONTRACTOR should note that where marine-related activities occur in coastal areas (e.g. pipe storage yards for offshore pipe sections and vehicular transport of supplies/personnel), the requirements specified in the coastal impact avoidance and mitigation sector of this CCP will apply. Should offshore-related activities occur in the onshore area (including onshore roads), the requirements specified in the Onshore Spill Prevention and Response CCP (IAL00-RSK-601-Y-TTM-0010) will apply. It is CONTRACTOR's responsibility to request the onshore CCPs from the COMPANY should they be required.

2.3 Responsibilities

The COMPANY's role is that of compliance assurance, as described in the Compliance Assurance Plan . It will be the responsibility of the COMPANY to ensure that its CONTRACTORs implement safety systems able to contain the uncontrolled spillage of oil, grease, etc. as the works are being executed (IT0965).

CONTRACTOR shall be responsible for ensuring that the Project (including all site operations, equipment and machinery) will comply with the defined Project Standards which encompass the requirements of Italian legislation, EU Directives, EBRD Environmental and Social Policy, IFC Performance Standards and IFC EHS Guidelines (IT0036). CONTRACTOR will also comply with the requirements of the COMPANY ESMS (IT0516) (including this CCP) and the ESIA Italy.

CONTRACTOR will be responsible for any adverse environmental, socio-economic and cultural heritage impacts arising from its activities and operations and for putting in place any necessary measures to avoid or, if not possible, mitigate them. CONTRACTOR will also be responsible for promptly reacting to accidental events and mitigating any resulting adverse environmental, socio-economic and cultural heritage impacts for which CONTRACTOR is responsible as much as possible. Should any such accidental events occur, CONTRACTOR will immediately inform the

COMPANY. Should these accidental events be the responsibility of CONTRACTOR (i.e. events resulting from CONTRACTOR's activities, events in areas which CONTRACTOR is responsible for) CONTRACTOR shall consult the COMPANY on the best way to handle and/or mitigate immediate risks to Project stakeholders, and shall implement appropriate mitigation measures as described in the relevant Construction Emergency Response Plan .

CONTRACTOR shall put these responsibilities into effect by:

- writing an Offshore Spill Prevention and Response ESIP (applicable to both coastal and marine offshore areas) that describes how it will implement the requirements described in Sections 3 and 4 of this CCP and other legal requirements
- implementing the Offshore Spill Prevention and Response ESIP by:
  - communicating the contents of the ESIP to its workers and subcontractors and training them to ensure that they understand their responsibilities with respect to offshore spill prevention and response management, incident reporting and response
  - ensuring that adequate resources are mobilised for offshore spill prevention and response management, including input from any specialist resources necessary to ensure effective planning and implementation of appropriate measures
  - ensuring compliance by its workers and subcontractors with the procedures established in the ESIP
  - implementing effective monitoring of offshore spill prevention and response measures to ensure that the effectiveness of offshore spill prevention and response management activities are assessed and any issues are promptly detected, in accordance with the Offshore Compliance Monitoring CCP (IAL00-RSK-601-Y-TTM-0023)
  - ensuring that all environmental, socio-economic and cultural heritage incidents are reported and dealt with effectively and that lessons are learned in accordance with the procedures outlined in the Contractor's ESMS Framework Document (CAL00-RSK-601-Y-TTM-0001)
  - keeping the COMPANY fully informed of any site environmental, socio-economic and cultural heritage issues.

CONTRACTOR shall be responsible for compiling the Offshore Spill Prevention and Response ESIP in a timely manner and submitting it to the COMPANY for review and acceptance a

maximum of 30 days after Contract award. The ESIP will not be considered "accepted for construction" until all comments raised by the COMPANY have been addressed by CONTRACTOR to the satisfaction of the COMPANY. Construction will not be allowed to commence before all relevant ESIPs are accepted.

3 Marine impact avoidance and mitigation

CONTRACTOR shall refer to, and ensure alignment with, the COMPANY Emergency Response Strategy (TAP-HSE-ST-0011) and the COMPANY Emergency Response Plan (TAP-HSE-PL-0007) in addition to the documentation listed in the following sections.

3.1 Spill prevention and emergency preparedness

The following information can be found in the Offshore Pollution Prevention CCP (IAL00-RSK-601-Y-TTM-0015) and Offshore Waste Management CCP (IAL00-RSK-601-Y-TTM-0019), which should be read in conjunction with this CCP:

- spill prevention measures such as training, equipment and marine vessel maintenance and inspection; and requirements for secure storage of hazardous liquids, including physical measures, procedures, auditing and assessment of risk. Material safety data sheets (MSDS) for all chemicals shall be available in the working language of CONTRACTOR personnel
- spill containment such as bunds, impermeable surfaces and drip trays, and appropriate processes for dealing with contaminated water that collects in the containment area.

3.1.1 Emergency response equipment

All Project locations will have spill environmental emergency response equipment (e.g. spill kits) easily available. CONTRACTOR shall ensure that an adequate supply of oil and chemical spill kits are available:

- at any location where chemicals/lubricants/fuels and liquid and hazardous waste are stored or handled
- within each work team supervisor's vessels. The spill kit should be appropriate to the activities the work team are involved in.

- within Project vessels that are involved in mobile refuelling activities
- at unmanned equipment.

The content of spill kits shall be appropriate for the type and volume of chemicals / lubricants / fuels / liquid and hazardous waste stored, and also for the most likely location of potential spills (i.e. on land or at sea). CONTRACTOR shall undertake a risk assessment to establish potential volumes and impact of a spill at all locations where fuel / lubricants / chemicals / liquid and hazardous waste are stored and at mobile locations (e.g. refuelling sites) and use the results of the risk assessment to define the content necessary for spill kits and the emergency response trained personnel required at each location.

Marine vessels will employ strict procedures to minimise the risk of fuel spillage during bunkering (IT0101). Appropriate spill containment equipment will be available at refuelling sites (IT0256). During vessel refuelling sufficient mops, pads and absorbents will be available to deal with spills promptly (IT0102).

CONTRACTOR shall maintain a database of MSDS for all chemicals / lubricants / fuels available at Project locations. The file shall be updated whenever a new substance is used at a Project location. A copy of this file shall be accessible in the event of an emergency. For further details on chemical management, see the Offshore Pollution Prevention CCP (IAL00-RSK-601-Y-TTM-0015).

CONTRACTOR shall develop and keep up-to-date a map indicating all chemical / lubricant / fuel storage locations, volumes stored, and spill kit locations, as well as an inventory of such equipment stored onboard marine vessels involved in the construction works. Spill kits shall be logged, inventoried and maintained to ensure adequate spill response material is available and functioning if needed. The number, location and content of spill kits shall be checked during regular inspections as required in the Offshore Compliance Monitoring CCP (IAL00-RSK-601-Y-TTM-0023) to ensure they remain adequate for the needs of the Project.

CONTRACTOR shall provide a full list in the Offshore Spill Prevention and Response ESIP of health and safety equipment (e.g. overalls, gloves, eye protection and shoes/boots) intended for use when responding to a spill, for acceptance by the COMPANY.

3.1.2 Emergency preparedness training

For information on emergency preparedness training procedures refer to the Offshore Employment, Training and Worksite Management CCP (IAL00-RSK-601-Y-TTM-0024).

3.1.3 Emergency response exercises

A series of spill emergency response exercises will be undertaken by CONTRACTOR to test emergency preparedness. These will include:

- communications test
- desktop exercises
- field exercises.

The exercises and emergency procedures shall be designed to differentiate between spills in different locations/situations.

CONTRACTOR shall compile a schedule of emergency response exercises and ensure that they are implemented. An observer (CONTRACTOR worker) who is familiar with the requirements of this CCP and the resulting Offshore Spill Prevention and Response ESIP shall observe emergency response exercises and make notes of the progression of the test and any failings/problems encountered.

All emergency response exercises will be followed up with a report of the exercise, including identification of any areas for improvement, to be submitted to the COMPANY. Where improvements are deemed necessary, appropriate actions shall be taken by CONTRACTOR and recorded and submitted to the COMPANY for acceptance. The COMPANY retains the right to insist upon the inclusion of further improvements by CONTRACTOR, should it feel that the current measures in place are not sufficient.

3.2 Spill response

CONTRACTOR shall develop, implement and appropriately resource a Marine Emergency Spill Response Plan in order to mitigate effects from any unintended or unauthorised release of a

potentially hazardous material. This shall be applicable to all locations/vessels where Project work is undertaken and will include the following information:

- identify locations where spill response equipment will be provided (see Section 3.1.1 above) and include procedures for its deployment
- a Project-specific Oil Spill Contingency Plan (OSCP)
- the requirement for Project marine vessels to have a Ship Oil Pollution Emergency Plan (SOPEP) (vessel specific (OSCP)) as required by the International Convention for the Prevention of Pollution from Ships (MARPOL 73/78) (if applicable). Relevant parts of the SOPEPs for applicable vessels will be included in the Marine Emergency Spill Response Plan
- a description of the environmental response crew (ERC), including contact information. CONTRACTOR is responsible for organising an ERC and ensuring that a marine vessel (appropriate to access current construction works) is always available for their use
- an explanation of the interface with the COMPANY spill response process. For details of the COMPANY spill response process, refer to the relevant Construction Emergency Response Plan .

All spills shall be reported in accordance with the COMPANY's incident reporting requirements (see Sections 3.2.1 and 3.3). Irrespective of the response organisation, CONTRACTOR retains all liabilities associated with response, clean-up and remediation for spills resulting from CONTRACTOR's activities.

3.2.1 Immediate response

3.2.1.1 Minor spills

Minor spills are defined as small local spills requiring no intervention from outside the CONTRACTOR organisation. Minor spills can be managed using on-site resources such as spill kits. Minor spills have the potential to arise during activities such as refuelling.

CONTRACTOR is responsible for providing trained spill response personnel and equipment to contain, clean-up and remediate minor spills.

The clean-up will be implemented using the spill kits held at each work location plus the provision of additional spill response equipment (if necessary) by CONTRACTOR.

3.2.1.2 Major spills

Major spills are defined as larger spills which require additional local (regional) resources and manpower. Major spills are likely to result from integrity failure of safety and protection systems and equipment, or large fuel losses.

CONTRACTOR is responsible for notifying the COMPANY and relevant authorities immediately following the occurrence of a major spill and for deploying its ERC to attend to the spill. CONTRACTOR shall provide the COMPANY with regular updates regarding progress with attending the spill.

Following its immediate notification by CONTRACTOR, the COMPANY shall be responsible for communicating with the authorities and, where necessary, the public regarding the nature of the spill and measures taken to mitigate its effects (for further information refer to the relevant Construction Emergency Response Plan .

At any point following COMPANY notification, the COMPANY may decide to take control of the spill response. CONTRACTOR shall cooperate with the COMPANY regarding spill response including making its ERC, other applicable personnel, and spill response materials available to the COMPANY (for further information refer to the relevant Construction Emergency Response Plan).

3.2.1.3 Crisis events

Crisis events are defined as very large, possibly ongoing spills that require additional resources from outside Italy. Such spills are considered very unlikely during Project construction and commissioning.

CONTRACTOR is responsible for notifying the COMPANY immediately following the occurrence of a crisis event, and for initiating immediate spill response. Following CONTRACTOR notification, the COMPANY shall organise the provision of a specialist spill response organisation

to respond, clean-up and remediate crisis event spills (with CONTRACTOR assistance) (for further information refer to the relevant Construction Emergency Response Plan). However, whilst the COMPANY is responsible for the organisation of the spill response, CONTRACTOR will retain all financial and legal liabilities associated with the response, clean-up and remediation for any crisis events resulting from its activities.

Following its immediate notification by CONTRACTOR, the COMPANY shall be responsible for communicating with the authorities and, where necessary, the public regarding the nature of the spill and measures taken to mitigate its effects (for further information refer to the relevant Construction Emergency Response Plan).

3.2.2 Clean-up and repair

“Clean” will be defined as a status of contamination that is equal to the background level of contamination recorded during pre-construction monitoring. Following immediate response, CONTRACTOR shall conduct an environmental inspection to identify areas that require clean-up, disposal (e.g. contaminated seabed material) and/or additional material or equipment requirements. The contaminated area shall be fully determined in extent (vertical and horizontal). CONTRACTOR shall ensure that all appropriate health, safety and environmental protection measures are adopted during the clean-up process.

Such measures may include but are not limited to:

- proposing contaminated seabed material/water clean-up (removal/remediation) techniques to the COMPANY to ensure that the seabed and/or marine water is cleaned to meet appropriate standards. The degree of clean-up required shall be decided on a case-by-case basis using a risk assessment as defined in the Environmental Project Standards Italy CONTRACTOR will establish appropriate clean-up limits in alignment with the COMPANY and all appropriate authorities. Clean-up shall not be started until the techniques are approved by the COMPANY in writing
- assessing the need for and supplying personal protective equipment (PPE)
- ensuring that all contaminated materials (e.g. rags, wipes, spill kits, PPE) are collected together for appropriate disposal (see the Offshore Waste Management CCP (IAL00-RSK-601-Y-TTM-0019) for more details)

- reinstating used spill kits and other additional kits or equipment
- installing and repairing drip trays and bunds.

All clean-up activities will be adequately documented and stored within CONTRACTOR's document control system. Documents shall be made available at COMPANY request and handed over to the COMPANY on completion of the Project to allow the COMPANY to transition this information to the Operations Management System.

3.3 Reporting and investigation

Incidents that could have impact on the health, safety, livelihoods and well being of people and/or has visible impacts (smoke etc.) will be communicated to the public. Responsibility for public communications depends on the severity of the spill and is described in Section 3.2 Spill Response.

For information on reporting and investigation procedures, refer to the Contractor's ESMS Framework Document (CAL00-RSK-601-Y-TTM-0001).

4 Coastal impact avoidance and mitigation

CONTRACTOR shall refer to, and ensure alignment with, the COMPANY Emergency Response Strategy (TAP-HSE-ST-0011) and the COMPANY Emergency Response Plan (TAP-HSE-PL-0007) in addition to the documentation listed in the following sections.

4.1 Spill prevention and emergency preparedness

The following details can be found in the Offshore Pollution Prevention CCP (IAL00-RSK-601-Y-TTM-0015) and Offshore Waste Management CCP (IAL00-RSK-601-Y-TTM-0019), which should be read in conjunction with this CCP:

- spill prevention such as training, equipment and vehicle maintenance and inspection and requirements for secure storage of hazardous liquids, including physical measures, procedures, auditing and assessment of risk. MSDS for all chemicals shall be available in the working language of CONTRACTOR personnel
- spill containment such as bunds, impermeable surfaces and drip trays, and appropriate processes for dealing with contaminated water that collects in the containment area
- impact mitigation such as siting storage tanks away from watercourses.

4.1.1 Emergency response equipment

The availability and contents of spill environmental emergency response equipment (e.g. spill kits) shall be as described in Section 3.1.1, but shall be applicable to coastal areas.

CONTRACTOR shall maintain a database of MSDS as described in Section 3.1.1, but applicable to coastal areas. For further details on chemical management, see the Offshore Pollution Prevention CCP (IAL00-RSK-601-Y-TTM-0015).

CONTRACTOR shall develop and keep up to date a map indicating all chemical / lubricant / fuel storage locations, volumes stored, and spill kit locations. The number, location and content of spill kits shall be checked during regular inspections as required in the Offshore Compliance Monitoring CCP (IAL00-RSK-601-Y-TTM-0023) to ensure they remain adequate for the needs of the Project.

CONTRACTOR shall provide a full list in the Offshore Spill Prevention and Response ESIP of health and safety equipment (e.g. overalls, gloves, eye protection and shoes/boots) intended for use when responding to a spill, for acceptance by the COMPANY.

4.1.2 Emergency preparedness training

For information on emergency preparedness training procedures refer to the Offshore Employment, Training and Worksite Management CCP (IAL00-RSK-601-Y-TTM-0024). All drivers will be trained in emergency spill response procedures (IT0264).

4.1.3 Emergency response exercises

Coastal emergency response exercises shall have the same requirements as described in Section 3.1.3 but shall be applicable to coastal areas.

4.2 Spill response

CONTRACTOR shall develop, implement and appropriately resource a Coastal Emergency Spill Response Plan in order to mitigate effects from any unintended or unauthorised release of a potentially hazardous material. This shall be applicable to all locations where Project work is undertaken, with particular attention to be paid to any watercourse crossings, wetland habitats and irrigation channels (especially those that act as an important habitat for migratory birds).

The Plan shall identify locations where spill response equipment will be provided and include procedures for its deployment. It shall also include contact details for an ERC and interface with the COMPANY spill response process. The ERC shall be the responsibility of CONTRACTOR to organise, including ensuring that the ERC always has access to an off-road vehicle. For details of the COMPANY spill response process, refer to the relevant Construction Emergency Response Plan .

CONTRACTOR shall ensure that an adequate supply of oil and chemical spill kits shall be available as described in Section 3.1.1 (but applicable to coastal areas).

All spills shall be reported in accordance with the COMPANY's incident reporting requirements (see Sections 4.2.1 and 4.3). Irrespective of the response organisation, CONTRACTOR retains all liabilities associated with response, clean-up and remediation for spills resulting from CONTRACTOR's activities.

4.2.1 Immediate response

Immediate response procedures and requirements (for minor spills, major spills and crisis events) shall be as described in Section 3.2.1, but shall be applicable to coastal areas.

4.2.2 Clean-up and repair

"Clean" will be defined as a status of contamination that is equal to the background level of contamination recorded during pre-construction monitoring. Following immediate response, CONTRACTOR shall conduct an environmental inspection to identify areas that require clean-up, disposal (e.g. contaminated ground) and/or additional material or equipment requirements. The contaminated area shall be fully determined in extent (vertical, horizontal). CONTRACTOR shall ensure that all appropriate health, safety and environmental protection measures are adopted during the clean-up process.

Measures may include but are not limited to those described in Section 3.2.2, but applicable to coastal areas (i.e. any soil or watercourse clean up requirements).

Coastal documentation of clean-up activities shall be as described in Section 3.2.2, but shall be applicable to coastal areas.

4.3 Reporting and investigation

Reporting and investigation requirements shall be as described in Section 3.3, but shall be applicable to coastal areas.

5 Training

The training requirements relating to offshore spill prevention and response can be found in the Offshore Employment, Training and Worksite Management CCP (IAL00-RSK-601-Y-TTM-0024).

6 Monitoring and Inspection

The monitoring and inspection requirements relating to offshore spill prevention and response can be found in the Offshore Compliance Monitoring CCP (IAL00-RSK-601-Y-TTM-0023).

7 Related documents

The following is a list of documents that, amongst others, have content relevant to this CCP:

- Contractor's ESMS Framework Document (CAL00-RSK-601-Y-TTM-0001)
- Onshore Spill Prevention and Response CCP (IAL00-RSK-601-Y-TTM-0010)
- Compliance Assurance Plan
- Construction Emergency Response Plan
- Offshore Pollution Prevention CCP (IAL00-RSK-601-Y-TTM-0015)
- Offshore Waste Management CCP (IAL00-RSK-601-Y-TTM-0020)
- Offshore Compliance Monitoring CCP (IAL00-RSK-601-Y-TTM-0023)
- Offshore Employment, Training and Worksite Management CCP (IAL00-RSK-601-Y-TTM-0024)
- TAP Battery Limits Onshore – Offshore Sections (CPL00-ENT-100-F-DFO-0002)
- Environmental Project Standards Italy
- COMPANY Emergency Response Strategy (TAP-HSE-ST-0011)
- COMPANY Emergency Response Plan (TAP-HSE-PL-0007).