

TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number:

IAL00-RSK-601-Y-TTM-0022\_00

Document Date : 09/06/2015

# TAP ITALY ESMS OFFSHORE COMMUNITY SAFETY AND SECURITY CCP



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022\_00

Document Date : 09/06/2015

# **TABLE OF CONTENTS**

1	Abbreviations and definitions	4
1.1	Defining "offshore", "coastal" and "marine" areas	6
2	Introduction	7
2.1	Objectives	8
2.2	Scope	8
2.3	Responsibilities	10
3	Marine impact avoidance and mitigation	12
3.1	General marine impact avoidance and mitigation	12
3.2	Health and safety risks to the Community	12
3.3	Community notification management	13
<b>3.4</b> 3.4.1 3.4.2 3.4.3	Construction site management Pollution prevention and resource availability Construction schedule Community safety during construction	<b>14</b> 14 15 15
<b>3.5</b> 3.5.1 3.5.2 3.5.3	Traffic safety management Marine Traffic Management Plan Project traffic safety Navigation restrictions and safety of other marine traffic	<b>15</b> 15 16 17
3.6	Security	18
<b>3.7</b> 3.7.1 3.7.2 3.7.3 3.7.4	Worker-community interaction General Worker health screening Worker awareness, education and behaviour Community health care	20 20 20 21 21
4	Coastal impact avoidance and mitigation	22
4.1	General coastal impact avoidance and mitigation	22
4.2	Health and safety risks to the Community	22
4.3	Community notification management	23
<b>4.4</b> 4.4.1 4.4.2 4.4.3	Construction site management Pollution prevention and resource availability Construction schedule Community safety during construction	24 24 25 25
<b>4.5</b> 4.5.1 4.5.2 4.5.3	Traffic safety management Coastal Traffic Management Plan Project traffic safety Access, diversions and road closures	26 26 28 31



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022\_00

	Document Date :	09/06/2015
4.6	Security	33
4.7	Worker-community interaction	35
4.7.1 4.7.2	General Worker health screening	35 35
4.7.3	Worker awareness, education and behaviour	35
4.7.4	Community health care	36
5	Community grievances	36
6	Training	37
7	Monitoring and Inspection	37
8	Related documents	37
List of Ta	ables	
Table 1-1	Abbreviations and definitions	4
List of Fi	gures	
Figure 1 I	Figure 1 Marine, coastal and onshore limits	



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022\_00

Document Date : 09/06/2015

# 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	The location of the first dry weld of the pipeline in Italy (i.e. the dry weld
Point Italy	closest to the sea)
CCP	Contractor Control Plan
CLO	Community Liaison Officer
Coastal areas	Areas located between the Battery Limit Point Italy and Mean High Water
	Springs (MHWS)
COMPANY	TAP AG
CONTRACTOR	Construction contractors for Italy
CSR	Corporate Social Responsibility
Cultural	A change to cultural heritage (in this context "cultural heritage" refers to any
heritage impact	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	A change to the environment (in this context the "environment" refers to any
impact	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.
ESIA	Environmental and Social Impact Assessment
ESIP	Environmental and Social Implementation Plan



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022\_00

Document Date : 09/06/2015

ESMS	Environmental and Social Management System
EU	European Union
FOC	Fibre Optic Cable
HSSSE	Health, Safety, Social, Security and Environment
IFC	International Finance Corporation
KP	Kilometre Point relating to the pipeline route as per the base case described
	in the ESIA. 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.
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)
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
Pipeline	Proposed pipeline scheme (TAP) including related facilities such as access
	roads etc.



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number:

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

Project	Proposed pipeline scheme that will bring natural gas from the Caspian
	region to Western and South-Eastern Europe (TAP)
Socio-	A change to the existing socio-economic environment (in this context the
economic	"socio-economic environment" refers to the combination of any existing
impact	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.
STD	Sexually Transmitted Disease
TAP	Trans Adriatic Pipeline
TAP AG	Trans Adriatic Pipeline joint venture company
TMP	Traffic Management Plan
WHO	World Health Organization

# 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)<sup>1</sup>. 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

<sup>&</sup>lt;sup>1</sup> 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.



TAP Italy ESMS Offshore Community Safety and Security CCP

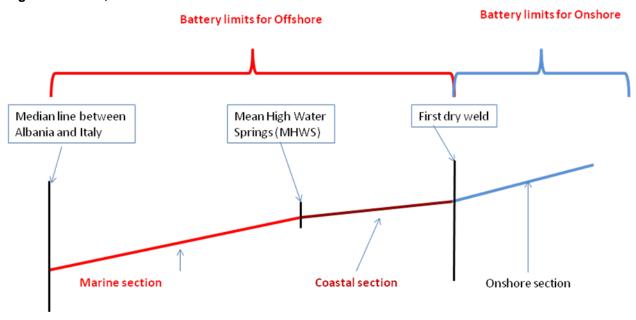
Document Number:

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

"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 community safety and security during the construction and commissioning phase of the Project and describes the COMPANY's requirements of the CONTRACTOR in terms of meeting these commitments. Where a specific commitment from the Italy Commitments Register is described in this CCP, it is followed by its reference number as stated on 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



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number:

IAL00-RSK-601-Y-TTM-0022 00

Document Date:

09/06/2015

COMPANY. This CCP shall act as a reference from which CONTRACTOR shall develop an Offshore Community Safety and Security ESIP (IT0532).

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.

## 2.1 Objectives

This CCP has been prepared to define the mitigation measures necessary to ensure that community safety and security practices are put in place, and that the risks of incidents and negative impacts are as low as reasonably practicable (ALARP<sup>2</sup>) during the construction phase of the offshore sections of the Project in Italy. The objectives of the CCP are to ensure that community safety and security measures comply with the commitments made in the Project ESIA Italy and international best practice.

## 2.2 Scope

This CCP defines COMPANY requirements (i.e. the commitments and best practice) in community safety and security management that CONTRACTOR shall implement during construction, including hydrotesting and commissioning.

The scope of this CCP includes:

- · community notification
- construction site management (with regards to community safety and security)
- marine traffic (i.e. vessels) safety and management

<sup>&</sup>lt;sup>2</sup> 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.



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number:

IAL00-RSK-601-Y-TTM-0022 00

Document Date:

09/06/2015

- coastal traffic safety and management
- security
- worker community interactions.

Measures for the prevention of pollution are detailed in the Offshore Pollution Prevention CCP (IAL00-RSK-601-Y-TTM-0015) and waste management measures are defined in the Offshore Waste Management CCP (IAL00-RSK-601-Y-TTM-0019). These are linked to community safety with regards to emissions, discharges and the release of contaminants.

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

This CCP applies to all areas that might be affected by the offshore 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. 110m 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.



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

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 section of this CCP will apply. Should any offshore-related activities occur in the onshore area (including onshore roads), the requirements specified in the Onshore Community Safety and Security CCP (temporary worksite (for the construction of the microtunnel)) 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.

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 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.



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

## CONTRACTOR shall put these responsibilities into effect by:

- writing an Offshore Community Safety and Security ESIP that describes how it will implement the requirements described in Sections 3 and 4 of this CCP and other legal requirements
- implementing the Offshore Community Safety and Security 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 community safety and security management, incident reporting and response
  - ensuring that adequate resources are mobilised for offshore community safety and security management, including input from any specialist resources necessary to ensure effective planning and implementation of appropriate measures
  - o ensuring compliance by its workers and subcontractors with the procedures established in the ESIP
  - implementing effective monitoring of community safety and security measures to ensure that the effectiveness of offshore community safety and security control and 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 immediately 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 completing the Offshore Community Safety and Security 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.



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number:

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

# 3 Marine impact avoidance and mitigation

# 3.1 General marine impact avoidance and mitigation

CONTRACTOR shall prepare information to be disclosed to Project affected communities regarding potential community safety and security impacts and mitigations at a sufficient level of detail to help these stakeholders to fully understand current and expected risks, and, as necessary, additional measures to be implemented.

CONTRACTOR shall submit the draft information to the COMPANY for review and consideration, and disclose and discuss the information with the affected communities under the COMPANY's supervision.

Some commitments are qualified with "where possible". If these cannot be implemented CONTRACTOR shall demonstrate to the satisfaction of the COMPANY why it not possible to comply with the commitment.

Based on an assessment of the quality and availability of existing heath facilities, CONTRACTOR will provide access to health care for those injured by its activities.

To prevent incidents caused by material or construction defects, CONTRACTOR will apply quality control when purchasing materials (IT0977), undertake continuous supervision of construction works (IT0978), carry out checks on all welds using non-destructive tests (IT0979), and undertake a hydraulic test before putting the pipeline into operation (IT0980). Where the pipeline route crosses an anchorage area, CONTRACTOR will appropriately protect the pipeline to avoid any potential damage caused by vessels anchoring in the area (IT0957).

## 3.2 Health and safety risks to the Community

Throughout the construction Contract, CONTRACTOR will:

• identify and evaluate the risks and potential impacts to the health and safety of affected communities and establish preventative measures and plans to address these in an appropriate manner to prevent/avoid the risk of impacts over minimisation and reduction



TAP Italy ESMS Offshore Community
Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date:

09/06/2015

 prior to and during construction activities, conduct regular community awareness campaigns to promote awareness and understanding of the health and safety risks associated with construction (IT0424)

- conduct regular worker HSE training (IT0424)
- prevent or minimise the potential for community exposure to hazardous materials that may be released by the Project
- identify communicable diseases of concern and develop an action plan where appropriate
  to prevent or minimise the potential for worker and community exposure to vector-borne
  and other communicable diseases that could result from Project activities. Marine
  requirements relating to the education of workers are described in Section 3.7.3.

CONTRACTOR's representatives will meet with local communities to explain the dangers associated with the construction works. Marine education and awareness activities will follow the processes outlined in Section 3.3.

Where the Project poses material risk to or potential adverse impacts on the health and safety of affected communities, CONTRACTOR (with the permission of the COMPANY) will disclose relevant Project-related information, to enable the affected communities and government agencies to understand these risks and potential impacts, as well as the proposed prevention, mitigation and emergency response measures, as appropriate. This disclosure will follow the processes outlined in Section 3.3.

## 3.3 Community notification management

Liaison with communities is covered by the Italy Stakeholder Engagement and Corporate Social Responsibility CCP (TAP-ASM-PR-0003). Of particular relevance to community safety and security is the role of the community liaison officer (CLO) in providing information to communities and in receiving feedback and complaints from communities with regard to community safety and security issues on the Project.

CONTRACTOR will appoint an appropriate number of CLOs and communicate to them the requirements of this CCP (IT0455).



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date :

09/06/2015

CLOs appointed by CONTRACTOR will provide education on marine traffic (i.e. vessel) safety to communities not normally subjected to high marine traffic volumes.

CONTRACTOR will, through the CLOs, meetings or other appropriate means:

- keep stakeholders in the immediate vicinity of the construction works informed about the planned activities, timelines, potential impacts and changes to schedules, if any (IT0463)
- provide clear and timely information to tourism operators on the exact timing of construction works, so that they are fully aware of the time of start and the period of duration of construction (IT0372)
- continue informing/ updating local tourism businesses about planned construction (duration, number of workers, activities and locations) as well as operation activities to manage expectations by providing clear information regarding the extent of Project activities and associated risks to the community and environment (IT0363).

The above CONTRACTOR CLO activities shall be conducted under the supervision of the COMPANY CLOs.

## 3.4 Construction site management

## 3.4.1 Pollution prevention and resource availability

The mitigation measures included in the Offshore Pollution Prevention CCP (IAL00-RSK-601-Y-TTM-0015), Offshore Waste Management CCP (IAL00-RSK-601-Y-TTM-0019), and Offshore Resource Management CCP (IAL00-RSK-601-Y-TTM-0014) as implemented by CONTRACTOR will also mitigate the potential impact on community safety from emissions, discharges and accidental releases of contaminants.

CONTRACTOR shall ensure that night time lighting onboard construction vessels, jetties and other marine infrastructure is reduced, where possible, to avoid disturbance to human receptors (such as navigation and coastal communities), while still meeting the legal requirements for navigation lighting under maritime law and still providing a safe level of illumination for the vessel crew.



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number:

IAL00-RSK-601-Y-TTM-0022 00

Document Date:

09/06/2015

#### 3.4.2 Construction schedule

Offshore construction will take place outside the summer season (June, July, August and September) in order to avoid having a negative effect on seaside and tourist activities. (IT0237).

## 3.4.3 Community safety during construction

During construction activities, CONTRACTOR will put in place the following community safety measures:

- a safety/fishing exclusion zone will be established around the pipelaying vessel with a radius of 2-3 km (depending on type of pipelaying vessel/anchor spread) to minimise the risk of interaction with marine vessels, including fishing vessels (IT0051)
- lights, radio communications systems and other safety devices will also be installed where necessary and as required by the relevant authorities.

# 3.5 Traffic safety management

## 3.5.1 Marine Traffic Management Plan

CONTRACTOR will develop a Marine Traffic Management Plan (TMP) as part of the Offshore Community Safety and Security ESIP in consultation with the competent authorities and municipalities, and will ensure it is applied for the entire duration of the construction works. The Marine TMP must be accepted by the COMPANY prior to commencement of construction activities.

CONTRACTOR's Marine TMP shall specifically cover arrangements for the following important aspects:

- Project speed limits for vessels in nearshore and offshore areas
- Project speed limits for vessels in controlled waters (e.g. harbors)
- the source of and number of qualified vessel operators required
- training and approval requirements for vessel operators
- hours of marine vessel operation and rest periods
- security arrangements for vessels
- arrangements for vessel operator communication with control points and vehicle equipment



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

- language/communication issues
- the source of suitable vessels (e.g. quality and specification)
- the number of vessels required. No more vessels than are absolutely necessary shall be operating at any one time. This will help to reduce the risk of collisions as well as helping to reduce the amount of waste generation, vessel fuelling, air emissions, etc
- the programme for preventative vessel maintenance
- identifying vessel routes, route planning and alternative routes
- notifying the municipalities, police and marine authorities of all approved Project transport routes
- the emergency recovery of vessels
- an appraisal of the socio-economic impacts of vessels in the local community (such as the
  assessment of any traffic related complaints or incidents in communities reported via the
  COMPANY Third-Party Grievance Mechanism (found at http://www.trans-adriaticpipeline.com), CONTRACTOR's third-party grievance mechanism or CLOs, community
  perceptions of Project related traffic impacts and positive or negative economic impacts
  through surveys or CLO meetings)
- procedures for spot checks and audits of the vessel transport system and for reporting problems
- arrangements to identify and co-operate with other major projects so that potential interactions do not result in significant environmental or social impacts.

CONTRACTOR will regularly update the Marine TMP as the construction method is developed and vessel movement requirements are identified in detail and will undertake regular inspections to ensure adherence to the Marine TMP.

## 3.5.2 Project traffic safety

CONTRACTOR Project vessels will be readily identifiable as being in use by the Project (e.g. an easy to read/see sign or symbol will be placed on vessels which shows that they are connected to the Project). CONTRACTOR will ensure that any sub-contractor vessels are also identifiable as being connected to the Project.



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number:

IAL00-RSK-601-Y-TTM-0022 00

Document Date :

09/06/2015

Vessel speed will be reduced while in controlled waters (e.g. harbours). CONTRACTOR will enforce the published speed limit, or an 8 km/h speed limit, whichever is lower. Project speed limits for other areas (e.g. near-shore and offshore) will be established and detailed in the Marine TMP.

CONTRACTOR will require and provide vessel operator safety, environmental, social and cultural heritage awareness training to promote safe and responsible vessel operation. Vessel operator training will be provider to all vessel operators, and marine vessel operation performance will be assessed and monitored with additional training provided if necessary. For further details please see the Offshore Employment Training and Worksite Management CCP (IAL00-RSK-601-Y-TTM-0024).

Approved Project transport routes will be identified by the COMPANY and CONTRACTOR preconstruction and will be included in the CONTRACTOR Marine TMP. If CONTRACTOR requires additional routes, a specific proposal will be submitted to the COMPANY and relevant authorities for consideration and acceptance.

# 3.5.3 Navigation restrictions and safety of other marine traffic

CONTRACTOR will calculate the number of marine vessels required for construction, to ensure that no more than are required are operating during the Project's construction phase. This will help reduce the risk of vessel collisions and shall minimise the disruption of local communities.

It is the responsibility of CONTRACTOR to ensure that the extent of the overall temporary marine footprint for construction activities is communicated adequately for the benefit of other marine users. Interaction with other marine users will be carried out in accordance with the Italy Stakeholder Engagement and Corporate Social Responsibility CCP (TAP-ASM-PR-0003).

CONTRACTOR shall report all vessel traffic to the COMPANY. All nearshore and offshore activities related to the construction and pre-commissioning of the TAP pipeline will be notified to mariners in accordance with established maritime practices at a national level (IT0233). CONTRACTOR will prepare a 'Notice to Mariners' which will detail the nature of the Project work, including the location, duration and the number and types of vessels involved. This will be



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date:

09/06/2015

communicated to the appropriate maritime authorities who will be requested to broadcast this information to ensure that all marine users are aware of the works taking place.

In addition to the above official Notice to Mariners, CONTRACTOR shall post notices of vessel activity associated with the construction activities at local marinas to ensure that smaller vessel operators are aware of the work. CONTRACTOR is responsible for marking the work area with buoys and lights as required by laws and regulations and to prevent accidents with other water crafts using the area.

Prior to the commencement of any construction activities or vessel transit that is considered to be particularly unusual e.g. the arrival of a particularly large ship, or one carrying a hazardous cargo (using the engagement methods specified in the Italy Stakeholder Engagement and Corporate Social Responsibility CCP (TAP-ASM-PR-0003)), CONTRACTOR will work with marine users to ensure that no vessels or fishermen are within the marine area that could be affected, and to avoid the potential for navigational incidents. No work or transit shall commence until relevant work areas or transit routes are clear.

To guarantee the safety of people and vessels and to reduce the possibility of an incident, the transit of vessels, such as small fishing vessels that are not involved in the Project's construction activities shall be restricted. It is the responsibility of CONTRACTOR to establish an exclusion zone to non-related vessel traffic within the Project's marine area and to agree this with the marine authorities. Specific requirements for the exclusion zone in different circumstances are stated in Section 3.4.3 above. CONTRACTOR will request permission from the COMPANY before engaging with the marine authorities.

## 3.6 Security

The COMPANY has undertaken a security review which will be provided to CONTRACTOR for information.



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

CONTRACTOR will produce a Marine Security Review and Plan taking into account the findings of the COMPANY security review and the requirements described in this section. The Marine Security Review shall:

- be risk based, taking into account local conditions
- describe the security arrangements that CONTRACTOR intends to put in place to restrict unauthorised access to, or use of, worksite facilities including, but not limited to:
  - o ensuring access to the works area will only be allowed for authorised Project staff
  - ensuring access to vessels in port shall be subject to the International Ship and
     Port Facility Security Code and local regulations
  - o using guard vessels to enforce the exclusion zones around the marine construction spread, as per international law
- assess risks posed by its security arrangements to those within and outside the Project site
  or facilities
- include details of training to be provided to security personnel
- be submitted to the COMPANY for acceptance prior to the start of work, including mobilisation, on any Project site.

CONTRACTOR will manage all aspects of its security activities and relationships transparently to the community and according to the Voluntary Principles on Security and Human Rights (IT0434). CONTRACTOR will facilitate the participation of security subcontractors in all relevant training requirements and will also provide HSSSE induction training for personnel on security issues. For further information on training, refer to the Offshore Employment, Training and Worksite Management CCP (IAL00-RSK-601-Y-TTM-0024).

CONTRACTOR will ensure that the effects of the Project's security arrangements (safeguarding of personnel and property) respect local community interests. CONTRACTOR will adopt a policy and related procedures including rules of engagement on security services provision in accordance with the Voluntary Principles on Security and Human Rights (IT0434). Security guard interaction with the community must comply with the Voluntary Principles of Security and Human Rights. In that perspective CONTRACTOR will conduct a due diligence of all security personal/subcontractors and implement under the COMPANY's supervision trainings on the Voluntary Principles. Performance will be monitored and audited periodically by CONTRACTOR.



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date:

09/06/2015

The COMPANY will publically disclose its security arrangements. Prior to this a Public Awareness Program will be developed by CONTRACTOR (and reviewed and approved by the COMPANY), to address the communication of various elements of the security programs; including the intended audiences, the kinds of security information to be communicated, frequencies and methodologies for communicating the information and evaluation of the programs for effectiveness.

## 3.7 Worker-community interaction

#### 3.7.1 General

The origin of the workforce is yet to be established. This is an important factor as some source countries may have a higher prevalence of certain communicable diseases than Italy, raising the possibility of increased incidence in local communities as a result of worker-community interactions.

CONTRACTOR will prevent or minimise the potential for community exposure to communicable diseases that could be present within the Project workforce.

CONTRACTOR will monitor the emergence of major pandemics through WHO alerts. If the WHO Pandemic Alert Scale reaches level 4 in any Project area CONTRACTOR will implement the relevant Emergency Response Plan (IT0415). CONTRACTOR will not recruit workers from countries/areas where a WHO Pandemic Alert level 4 is in place.

## 3.7.2 Worker health screening

Regular health checks of workers will be conducted (IT0407). CONTRACTOR will require all workers and subcontractor workers to undergo pre-employment health screening, in compliance with relevant employment legislation. Thereafter, CONTRACTOR will ensure that all workers (including subcontractor workers) undergo regular health screening (every 6 months). CONTRACTOR will also offer voluntary pre-employment screening and ongoing screening for STDs (sexually transmitted diseases) (IT0425).



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number:

IAL00-RSK-601-Y-TTM-0022 00

Document Date:

09/06/2015

Pre-employment screening should be undertaken in an approved clinic in the worker's country of origin.

# 3.7.3 Worker awareness, education and behaviour

CONTRACTOR shall avoid any local disputes and/or crime through respecting local culture and values. This requirement is applicable to all workers employed by CONTRACTOR and any of its subcontractors. As part of this, CONTRACTOR shall ensure that workers are aware of local issues and sensitivities.

The COMPANY will extend the Code of Conduct and/or other relevant documents (in particular the Stakeholder Engagement Strategy (TAP-HSE-ST-0009)) to include guidelines on worker–community interactions by which CONTRACTOR and all sub-contractors are required to abide.

## **CONTRACTOR will:**

- ensure all workers and subcontractors receive education around training on:
  - the Code of Conduct
  - transmission routes and symptoms of communicable diseases of concern
  - STDs including transmission routes and symptoms
- provide free condoms and femidoms to all workers (including to sub-contractors etc.).

CONTRACTOR will conduct appropriate with-cause drug and alcohol testing of the workforce, record results and take any necessary action. For further details please see the Offshore Employment, Training and Worksite Management CCP (IAL00-RSK-601-Y-TTM-0024).

# 3.7.4 Community health care

CONTRACTOR will provide health care for any member of the community injured as a result of Project construction phase activities (IT0417).



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

# 4 Coastal impact avoidance and mitigation

# 4.1 General coastal impact avoidance and mitigation

General coastal impact avoidance and mitigation will have the same requirements as described in Section 3.1, but be applicable to coastal areas.

# 4.2 Health and safety risks to the Community

Throughout the construction contract, CONTRACTOR will:

- identify and evaluate the risks and potential impacts to the health and safety of the affected community and establish preventative measures and plans to address these in an appropriate manner to prevent/avoid the risk of impacts over minimisation and reduction
- prior to and during construction activities, conduct regular community awareness campaigns to promote awareness and understanding of the health and safety risks associated with construction (IT0424)
- conduct regular worker HSE training (IT0424)
- prevent or minimise the potential for community exposure to hazardous materials that may be released by the Project
- identify communicable diseases of concern and develop an action plan where appropriate to prevent or minimise the potential for worker and community exposure to vector-borne and other communicable diseases that could result from Project activities. Requirements relating to the education of workers are described in Section 4.7.3.

CONTRACTOR's representatives will meet with local communities to explain the dangers associated with the construction works. CONTRACTOR will undertake a programme of stakeholder engagement and consultation to inform local communities of the risks of trespassing onto sites (IT0426). Particular emphasis will be placed on talking to children and their parents/teachers and explaining the dangers of construction activities such as road traffic, construction sites and open excavations. Education and awareness activities will follow the processes outlined in Section 4.3.



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date :

09/06/2015

Where the Project poses material risk to, or potential adverse impacts on, the health and safety of affected communities, CONTRACTOR (with the permission of the COMPANY) will disclose relevant Project-related information as described in Section 3.2. This disclosure will follow the processes outlined in Section 4.3.

# 4.3 Community notification management

Liaison with communities is covered by the Italy Stakeholder Engagement and Corporate Social Responsibility (CSR) CCP (TAP-ASM-PR-0003). Of particular relevance to community safety and security is the role of the CLO (see Section 3.3 for more information).

CONTRACTOR will appoint CLOs and communicate to them the requirements of this CCP. CONTRACTOR will maintain a community relations team that will include one community liaison officer at each workfront during construction activities (IT0455)

## CLOs appointed by CONTRACTOR will:

- deliver or organise safety awareness training to local communities (including teachers, local children and their parents), of the risks of trespassing onto sites (IT0426), placing particular emphasis on talking to children and explaining the dangers of construction sites and open excavations
- provide education on traffic safety to communities not normally subjected to high traffic loads.

The above CONTRACTOR CLO activities shall be conducted under the supervision of the COMPANY CLOs.

CONTRACTOR will also, through the CLOs, meetings or other appropriate means:

- keep stakeholders in the immediate vicinity of the construction works informed about the planned activities, timelines, potential impacts and changes to schedules, if any (IT0463)
- provide land owners with timely and clear information on timing of construction works so
  that they become fully aware of the exact time for start of the construction and of the
  duration of interruption of agricultural activities (IT0348)



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

 pre-notify local municipalities of critical dust producing activities at least 72 hours in advance of the activities commencing

- consult ambulance, police, fire services and heads of communes regarding road diversions
- provide clear and timely information to tourism operators on the exact timing of construction works, so that they are fully aware of the time of start and the period of duration of construction (IT0372)
- continue informing/ updating local tourism businesses about planned construction (duration, number of workers, activities and locations) as well as operation activities to manage expectations by providing clear information regarding the extent of Project activities and associated risks to the community and environment (IT0363).

The above CONTRACTOR activities shall be conducted under the supervision of the COMPANY CLOs.

# 4.4 Construction site management

## 4.4.1 Pollution prevention and resource availability

The measures included in the Offshore Pollution Prevention CCP (IAL00-RSK-601-Y-TTM-0015), Offshore Waste Management CCP (IAL00-RSK-601-Y-TTM-0019) and Offshore Resource Management CCP (IAL00-RSK-601-Y-TTM-0014) and implemented by CONTRACTOR will also mitigate the potential impact on community safety from emissions, discharges, accidental releases of contaminants, and the availability of freshwater resources.

In addition, CONTRACTOR will regularly maintain all Project vehicles and provide drivers with training in driving methods designed to avoid unnecessary emissions and which are considerate to the local communities (e.g. switching engines off when waiting to enter site or stationary on site, avoiding engine stress and reducing vehicle speed in and near communities) (IT0889).

Project vehicles will also be prohibited from driving through watercourses except in cases where this would be unavoidable for construction activities in order to protect water quality and prevent the potential impact on water abstractions or users. Should CONTRACTOR believe that it is necessary for vehicles to enter watercourses, CONTRACTOR shall request written permission



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number:

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

from the COMPANY before proceeding. This request should be included in the Coastal TMP (see Section 3.5.1).

#### 4.4.2 Construction schedule

Construction activities on the coast will be suspended during the summer season in order to avoid interfering with tourism (IT0010).

## 4.4.3 Community safety during construction

During construction activities, CONTRACTOR will put in place the following community safety measures:

- water will be pumped from flooded excavations (e.g. with centrifugal pumps or well points as appropriate) where a risk assessment concludes that they present a safety risk to people or livestock
- welded strings will be capped to prevent entry
- bridges (or other means of crossing) will be provided across open trenches and welded pipes at locations where there is a demonstrable need for people to cross, if it is reasonable for them to do so and can be accommodated safely taking into account works being undertaken in that area at the time
- gaps will be left in pipe strings where safe to do so and where necessary to allow people,
   wildlife and livestock to cross the pipeline working strip
- protective barriers will be erected at excavations that are at a road or watercourse crossing, or close to a community, or that are flooded temporarily; warning barriers will be deployed around areas of lesser risk to members of the public
- warning posts and bunting will be erected to mark overhead cables and temporary crossing points (IT0058)
- signs will be put up around work fronts (in Italian and diagram form) advising people of the risks associated with trespassing (IT0430)
- to minimise the risk of trespass, fencing will be installed around temporary facilities (e.g. pipelay yards) for their period of operation (IT0430).



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date:

09/06/2015

The CONTRACTOR will participate in the COMPANY provided programme of education on risks of trespass at local schools and in the community.

# 4.5 Traffic safety management

The movement of personnel, machinery, plant and equipment on public roads has the potential to impact on community safety and has the potential to be the highest cause of community safety incidents. Hazards to personnel (and others (e.g. community members)) associated with vehicle transportation, both on and off-road, will present one of the most significant risk exposures of the Project..

Accordingly, CONTRACTOR will develop and implement management procedures to reduce the risks associated with vehicle use. These procedures will include measures to reduce the exposure of vehicle drivers, their passengers and other road users to traffic hazards (IT0883).

## 4.5.1 Coastal Traffic Management Plan

CONTRACTOR will develop a Coastal TMP as part of the Offshore Community Safety and Security ESIP (IT0521) to reduce the risk of accidents (IT0817), in consultation with the competent authorities, traffic police and municipalities, and will ensure it is applied for the entire duration of the construction works (IT0827). The Coastal TMP must be accepted by the COMPANY prior to commencement of construction activities.

The Coastal TMP will be implemented to manage construction traffic generated by the project, minimise traffic disruption and road user delay and provide for the on-going safety of road users, including pedestrians and cyclists (IT0876). The Coastal TMP will detail the management procedures to be put in place, including ensuring drivers of construction vehicles are competent, have undergone a health check (see Section 4.7.2), and they have attended a HSE course (IT0817).



Document Title : TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number: IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

CONTRACTOR's Costal TMP shall specifically cover arrangements for the following important aspects:

- Project traffic speed limits on the working strip, work sites, access roads, etc.
- the source of and number of qualified drivers required
- training and approval requirements for drivers
- hours of driving and rest periods
- security arrangements for drivers, vehicles and loads
- arrangements for driver communication with control points and vehicle equipment
- language/communication issues
- the source of suitable vehicles (e.g. quality and specification)
- the number of vehicles required
- the programme for preventative vehicle maintenance
- identifying vehicle routes, route planning and alternative routes. This will include planning traffic routes to limit road use by the Project during high public traffic periods in order to reduce traffic risks to the community and the workers (IT0418)
- notifying the municipalities and police of all approved Project transport routes
- overall vehicle movements (such as a journey management system including procedures for the planning and undertaking of each journey)
- the emergency recovery of vehicles
- road safety programmes for schools (where Project traffic passes schools or roads used by school children to access school)
- establishing manned crossing points near schools during key hours in the morning and afternoon (where Project traffic passes schools or roads used by school children to access school)
- notifying the public of temporary road diversions and closures
- an appraisal of the socio-economic impacts of vehicles in the local community (such as the assessment of any traffic related complaints or incidents in communities reported via the COMPANY Third-Party Grievance Mechanism (found at http://www.trans-adriatic-pipeline.com), CONTRACTOR's third-party grievance mechanism or CLOs, community perceptions of Project related traffic impacts and positive or negative economic impacts through surveys or CLO meetings)



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

 procedures for undertaking regular inspections spot checks and audits of the transport system to ensure adherence to the Coastal TMP and for reporting problems (IT0892)

- traffic control procedures, including entering and exiting construction areas and the working strip (see Section 4.5.2)
- identifying emergency service vehicle parking areas. CONTRACTOR will ensure that part
  of the construction site is set aside for the parking of emergency service vehicles.
  CONTRACTOR shall ensure that the Emergency Service Parking area and access routes
  around the site are never occupied by any other vehicles and will be provided with a sign
  denoting Emergency Services Parking Area
- identifying construction personnel parking areas. CONTRACTOR is expected to make provision for a dedicated parking area on the construction base for the private vehicles of construction personnel
- arrangements to identify and co-operate with other major projects so that potential interactions do not result in significant environmental or social impacts.

The COMPANY reserves the right to have automatic monitoring systems installed in CONTRACTOR vehicles.

CONTRACTOR shall regularly update the Coastal TMP as the construction method is developed and vehicle movement requirements are identified in detail (IT0877).

## 4.5.2 Project traffic safety

CONTRACTOR Project vehicles will be readily identifiable as being in use by the Project (e.g. an easy to read/see sign or symbol will be placed on vehicles which shows that they are connected to the Project) (IT0891). CONTRACTOR will ensure that any sub-contractor vehicles are also identifiable as being connected to the Project.

Vehicle speed will be reduced while travelling on all construction roads. CONTRACTOR will enforce a 20 km/h speed limit on the pipeline working strip, and appropriate speed limits for other work sites and access roads will be established and detailed in the Coastal TMP.



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

CONTRACTOR will require and provide driver safety, environmental, social and cultural heritage awareness training to promote safe and responsible driving behaviour (IT0420). Driver training will be provided to all drivers, and driving performance will be assessed and monitored with additional training provided if necessary. Project vehicle drivers will be trained/informed on safe driving as regards other drivers and non-motorised traffic, such as pedestrians, cyclists and livestock (IT0830). Night-time driving will be by exception only, as approved by the COMPANY, to minimise driving risk and disturbance to communities.

#### CONTRACTOR will also:

- control and supervise the arrival and departure of construction traffic at site entrances (IT0881)
- provide appropriate supervision to control the flow of traffic when machinery needs to cross roads
- maintain access and site roads in good condition (IT0828)
- actively discourage communities from using the pipeline right of way as an access road to grazing lands or properties (through use of signage, public education, leaflets, etc.)
- comply with all statutory vehicle limits (width, height, loading, gross weight) and any other statutory vehicle requirements, and ensure any subcontractors comply with statutory requirements
- provide signposted parking facilities at pipe yards and at accessible locations on the road network. The parking of construction vehicles on footways, and double parking will be prohibited on public highways
- to minimize the risk of traffic incidents, all activities affecting roads will be notified to the local authority in advance of the activity taking place (IT0421).

In terms of traffic control, vehicles will be prohibited from reversing unattended into the construction base, construction sites or working strip along the pipeline route. Vehicles and plant shall enter and exit these areas in a forward direction, as far as possible. In addition, CONTRACTOR will ensure that all heavy goods vehicles are equipped with audible reversing alarms.

Approved Project transport routes will be identified by the COMPANY and CONTRACTOR preconstruction, in the same way as described in Section 3.5.2. All heavy vehicle construction traffic



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date:

09/06/2015

will be assigned to suitable, approved routes to and from the working area (IT0829). All machinery and vehicles will be restricted to the designated working strip and approved access roads (IT0286). If possible, heavy truck traffic supporting construction activities will be routed away from noise sensitive receptors (IT0180).

Traffic density will be timed, wherever practicable, to avoid periods of heavy traffic flow along main roads. CONTRACTOR will not commence any work that affects the public highway until all agreed traffic safety and management measures essential for the works are accepted and agreed with the relevant authorities and the COMPANY. CONTRACTOR will enforce restrictions on construction traffic movements during periods of heavy traffic on the road network if necessary (IT0884).

Where roads used by children to reach schools are utilised by Project construction traffic, CONTRACTOR will provide road safety education at schools and minimise Project vehicle traffic during hours that children are travelling to and from school. CONTRACTOR will also establish manned crossing points if identified as being required, and shall be described in the Coastal TMP.

CONTRACTOR will liaise with the police and other authorities to agree routes to be used by Project vehicles delivering 'abnormal loads' (i.e. slow moving, very high or wide loads) and their timing in conjunction with the highway authority (and the Municipal Police) (IT0885). CONTRACTOR will provide advanced warning of the routes and times of abnormal load deliveries (IT0886)).

CONTRACTOR will be responsible for installing/setting up clear signs, flagmen and signals where necessary. Where temporary traffic signals or signs are required, the details and locations will be discussed with the relevant authorities. The signs will be fixed safely and securely to ensure that they do not become detached or dislocated, and will be visible and comprehensible by all. CONTRACTOR will also carry out maintenance checks to clean and re-secure signs if necessary.



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

Signage will be provided by CONTRACTOR (where it is not already present) to advise drivers of distances to the next passing location (to minimise inappropriate overtaking of slow moving vehicles), after liaising with the relevant authorities as necessary.

# 4.5.3 Access, diversions and road closures

CONTRACTOR will produce a method statement for each road crossing, for acceptance by the COMPANY and approval by the appropriate authorities prior to commencing work (IT0093). Agreements will be made with the public or private owners and in consultation with local municipalities and regional road agencies. Public notice of construction activities and implications will be locally made available (IT0895). Prior to any road crossing construction, CONTRACTOR will notify and consult with all necessary agencies/authorities operating infrastructure impacted by the crossing (IT0967). Where the pipeline crosses roads with heavy traffic (regional and provincial roads) and/or underground services and utilities (sewers, cables, etc.), CONTRACTOR will adopt trenchless techniques (e.g. shaft sleeve) (IT0966). Provision shall be given for the continuation of normal traffic during open-cut road crossings and all open cuts shall be covered at the end of each working day. Night-time work is prohibited except in emergency situations. If night-time work is required under an emergency operation, then warning lights will be used around the working site. Any road damage will be repaired to an equal or better standard as required by the Offshore Infrastructure and Utilities CCP (IAL00-RSK-601-Y-TTM-0025).

Traffic will be diverted around road crossing via detours or temporary roads (IT0091). CONTRACTOR will consult with the relevant government agencies to identify where project plans can complement existing road development plans at the district and provincial level (IT0878). CONTRACTOR will consult with the principal representative of any communities that will suffer a significant increase in traffic in order to develop awareness of the mitigation measures within the Coastal TMP (IT0879). Use of the roads along the coast, particularly the coast road between San Foca and Torre Specchia Ruggeri, by construction vehicle traffic will be avoided during the summer season as far as possible (IT0893).

CONTRACTOR will give the public at least 72 hours advance warning of any proposed temporary road diversions and closures (e.g. suitable signage and information in the press or via CLOs) (IT0888). Temporary road closures (during works for new or altered roads) will be



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

09/06/2015

Document Date :

scheduled as far as is practical during times which will minimise disruption to road users (IT0887) and will be planned in conjunction with the highway and other relevant authorities.

If road closures are required, CONTRACTOR will:

- plan and communicate diversions to the authorities (including emergency services and public transport providers) and affected communities at least 72 hours in advance (via a pre-construction community meeting or CLOs)
- ensure diversions are properly sign-posted
- provide CLOs at work fronts to ensure that impacts from planned disruptions are minimised and that the disruptions are properly managed (IT0385, IT0386)
- provide crossing for pedestrians and animals, which may avoid the need for a diversion
- where possible, avoid any diversion that prevents a public transport service from continuing or requires a diversion of more than 1 km for vehicles or a diversion of more than 500 m for pedestrians or livestock
- for crossings of secondary rural roads, establish temporary diversions where no reasonable alternative local access exists (IT0896)
- prepare the pipe prior to commencement of roadway excavation in order to minimise the duration of traffic disruption (IT0092)
- comply with the following notification periods for road closures, if not otherwise stated in legal regulations. In all cases alignment with the local authorities and regulations must be carried out:
  - two weeks minimum notice on closure of up to 28 days
  - o one month minimum notice on closure of 28 days to three months
  - three months notice for closure over three months, or for permanent closure.

At all times CONTRACTOR will ensure that access to commercial and residential properties is maintained and that alternative access is provided when roads are blocked during construction to allow those affected to access fields and other places of work. Should this not be possible, this will be agreed with users and compensation provided if required (IT0360).

In rural areas, CONTRACTOR will provide crossings over the pipeline construction area where possible to avoid any impacts associated with severance of grazing or agricultural land. The location of such crossings will be agreed between the CONTRACTOR and local farmers as part



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date :

09/06/2015

of the consultation on the construction management plan. COMPANY will ensure that clauses are included in CONTACTOR agreements to ensure that such crossings are carried out where necessary (IT0356). Where crossings of the construction area are not possible and farmers will experience a loss of grazing or additional journey times during the construction period, compensation will be provided (IT0359) in accordance with the Livelihoods Restoration Framework (TAP-LEA-PL-0004).

Sensitive receptors such as hospitals and clinics will be identified along Project access routes. CONTRACTOR will ensure that access to and from these facilities is not restricted by Project activities, or an alternative access is in place and has been agreed with the hospital or clinic staff. Project drivers will be trained so they understand the importance of ensuring free access and egress of ambulances to the hospital and all traffic to clinics. Road diversions will not increase the response time of these services to local communities.

The Offshore Infrastructure and Utilities CCP (IAL00-RSK-601-Y-TTM-0025) includes the mitigation measures that will be implemented during pre-construction infrastructure and utility surveys, identification and authority approval of upgrades and the community liaison required.

## 4.6 Security

The COMPANY has undertaken a security review which will be provided to CONTRACTOR for information.

CONTRACTOR will produce a Coastal Security Review taking into account the findings of the COMPANY security review and the requirements described in this section. The Coastal Security Review shall:

- be risk based, taking into account local conditions
- describe the security arrangements that CONTRACTOR intends to put in place to restrict
  unauthorised access to, or use of, worksite facilities including ensuring access to the works
  areas will only be allowed for authorised Project staff.
- include details of training to be provided to security personnel
- assess risks posed by its security arrangements to those within and outside the Project site
  or facilities



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

 be submitted to the COMPANY for acceptance prior to the start of work, including mobilisation, on any Project site.

CONTRACTOR will manage all aspects of its security activities and relationships transparently to the community and according to the Voluntary Principles on Security and Human Rights (IT0434), and shall facilitate and provide training as described in Section 3.6 and the Offshore Employment, Training and Worksite Management CCP (IAL00-RSK-601-Y-TTM-0024).

CONTRACTOR will ensure that the effects of the Project's security arrangements (safeguarding of personnel and property) respect local community interests. CONTRACTOR will adopt a policy and related procedures including rules of engagement on security services provision in accordance with the Voluntary Principles on Security and Human Rights (IT0434). Security guard interaction with the community must comply with the Voluntary Principles of Security and Human Rights. In that perspective CONTRACTOR will conduct a due diligence of all security personal/subcontractors and implement under the COMPANY's supervision trainings on the Voluntary Principles. Performance will be monitored and audited periodically by CONTRACTOR.

CONTRACTOR will, when work fronts are less than 100 metres from a community or house, employ and adequately train security guards from the local community to prevent trespass. When work fronts are within 100 m of an inhabited building, CONTRACTOR will park all equipment overnight in a demarcated area (IT0433). CONTRACTOR will ensure that the effects of the Project's security arrangements (safeguarding of personnel and property) respect local community interests. Security guard interaction with the community must comply with the Voluntary Principles of Security and Human Rights. In that perspective CONTRACTOR will conduct a due diligence of all security personal/subcontractors and implement under the COMPANY's supervision trainings on the voluntary principles.

The COMPANY will publically disclose its security arrangements. Prior to this a Public Awareness Program will be developed by CONTRACTOR as described in Section 3.6, but applicable to coastal areas.



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

# 4.7 Worker-community interaction

#### 4.7.1 General

Coastal worker-community management and mitigation measures shall be the same as described in Section 3.7.1, but shall be applicable to coastal areas.

## 4.7.2 Worker health screening

CONTRACTOR will require all workers and subcontractors to undergo health screening as described in Section 3.7.2.

CONTRACTOR will ensure any trucking companies employed to work on the Project have policies around health screening of its workers in line with Project requirements and will ensure that truck drivers are also offered voluntary screening for STDs if not included in the truck companies' health screening programme. Truck drivers on the Project will also be included in an appropriate with-cause drug and alcohol testing programme (see Section 4.7.3 below).

## 4.7.3 Worker awareness, education and behaviour

CONTRACTOR shall avoid any local disputes and/or crime through implementing the same requirements as are described in Section 3.7.3, but applicable to coastal areas.

The COMPANY will extend the Code of Conduct and/or other relevant documents (in particular the Stakeholder Engagement Strategy (TAP-HSE-ST-0009)) to include guidelines on worker–community interactions by which CONTRACTOR and all sub-contractors are required to abide.

## CONTRACTOR will:

- ensure all workers and subcontractors receive education around training on
  - the Code of Conduct
  - o transmission routes and symptoms of communicable diseases of concern
  - STDs including transmission routes and symptoms
- ensure that all truck drivers who will work on the Project receive training on the Code of Conduct and disease awareness training



TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number :

IAL00-RSK-601-Y-TTM-0022 00

Document Date :

09/06/2015

 provide free condoms and femidoms to all workers (including to sub-contractors, truck drivers, etc.).

CONTRACTOR will conduct appropriate with-cause drug and alcohol testing of the workforce, record results and take the necessary actions. For further details please see the Offshore Employment, Training and Worksite Management CCP (IAL00-RSK-601-Y-TTM-0024).

## 4.7.4 Community health care

Coastal community health care requirements will be the same as described in Section 3.7.4, but applicable to coastal areas.

# 5 Community grievances

Any grievances may be reported by members of the local communities via the COMPANY and CONTRACTOR CLOs, and/or the COMPANY Third-Party Grievance Mechanism (found at http://www.trans-adriatic-pipeline.com) and/or CONTRACTOR's third-party grievance mechanism.

CONTRACTOR will include information about both CONTRACTOR's third-party grievance mechanism and the COMPANY's Third-Party Grievance Mechanism (found at http://www.trans-adriatic-pipeline.com), including contact details, in all relevant communication materials.

If the COMPANY receives a third-party grievance relating to the activities of CONTRACTOR or its subcontractors, the COMPANY will forward the grievance to CONTRACTOR for resolution. CONTRACTOR will resolve the grievance in accordance with CONTRACTOR's third-party grievance mechanism. CONTRACTOR's third-party grievance mechanism shall be linked to and aligned with the principles of the COMPANY Third-Party Grievance Mechanism (found at http://www.trans-adriatic-pipeline.com).

Any deviation from the above will need to be substantiated and submitted for acceptance in writing to the COMPANY.



Document Title : TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number: IAL00-RSK-601-Y-TTM-0022 00

Document Date : 09/06/2015

CONTRACTOR will support the COMPANY's Grievance Managers in all respects and respond to requests within 3 working days.

For more information on third-party grievance procedures, refer to the Third-Party Grievance Mechanism (found at http://www.trans-adriatic-pipeline.com).

## 6 Training

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

# 7 Monitoring and Inspection

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

## 8 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 Community Safety and Security CCP (IAL00-RSK-601-Y-TTM-0009)
- Compliance Assurance Plan
- Third-Party Grievance Mechanism (http://www.trans-adriatic-pipeline.com)
- Stakeholder Engagement Strategy (TAP-HSE-ST-0009)
- Community Liaison Management Plan
- Offshore Resource Management CCP (IAL00-RSK-601-Y-TTM-0014)
- Offshore Pollution Prevention CCP (IAL00-RSK-601-Y-TTM-0015)
- Offshore Waste Management CCP (IAL00-RSK-601-Y-TTM-0019)
- Offshore Compliance Monitoring CCP (IAL00-RSK-601-Y-TTM-0023)
- Offshore Employment, Training and Worksite Management CCP (IAL00-RSK-601-Y-TTM-0024)



Document Title : TAP Italy ESMS Offshore Community Safety and Security CCP

Document Number: IAL00-RSK-601-Y-TTM-0022\_00

Document Date : 09/06/2015

Offshore Infrastructure and Utilities CCP (IAL00-RSK-601-Y-TTM-0025)

- Italy Stakeholder Engagement and Corporate Social Responsibility CCP (TAP-ASM-PR-0003)
- TAP Battery Limits Onshore Offshore Sections (CPL00-ENT-100-F-DFO-0002)
- Livelihoods Restoration Framework (TAP-LEA-PL-0004).