

Recommendations and Actions Plan

Update : February 2021

No.	Recommendations	Evaluation of recommendations			Actions Plan
		In progress / already implemented	Scheduled to be implemented	Not implemented / NA	
<b>PS1: Environmental and Social Assessment and Management System</b>					
1.5(1)	Have a clear set of criteria to determine when: (1) E&S involvement is required in design changes (2) NEMA need to be consulted on changes	X			The TEPU Management of Change Procedure L2-PRO-HSE-03-03 has been amended to include the process which all entities must follow in the event there is a change to the approved ESIA's. The process also includes requirements for consultation and notification to authorities.
1.5(1)	E&S teams to be fully involved in management of change process for design changes (when the conditions for evaluation are met)	X			As above, the Management of Change Procedure includes the specific roles and responsibilities of each department including Environment and Social.
1.5(1)	Adequate resources to be retained for E&S analysis of changes during detailed design	X			Dedicated E&S resources have been mobilised to ensure that impacts and mitigations are fully considered for any proposed changes to the project base case.
1.5(2)	Ensure that E&S resources are an integral part of the development and updating of Project risk registers	X			The project risk register is updated on a periodic basis and includes detailed discussions with E&S Teams. Resourcing has been identified by department heads at affiliate level and alongside project teams and will be reviewed on a periodic basis.
1.6(2)	Ensure that the gap analysis of national standards and Total standards is up to date and act to fill gaps where identified.	X			The process of gap analysis of National Standards vs project/Total specifications is continuous. The Legal Team is responsible for identification of new/changes to legislation. In addition, TEPU is invited to consult on any new ENV legislation affecting oil and gas activities in Uganda.
1.6(2)	Undertake a gap analysis of Total standards with IFC requirements. Due to immediate needs this is best done by the Project / TEPU.		X		A gap analysis of Total standards with IFC requirements is planned for 2021 as per ENV work program.
1.6(2)	Ensure comprehensive and clear responsibilities and structures for regulatory compliance management and reporting.	X			L2-PRO-HSE-04-42 specifies the procedure to be followed for the management of environmental data management and reporting. This procedure is scheduled for review in 2021 to ensure that all reporting requirements regulatory and internal are fully captured.
1.6(2)	Total / Project should maintain a detailed regulatory compliance matrix which is supplied to contractors to facilitate their regulatory compliance.	X			The project team has in place a Permit, Licenses, Authorization, Consents and Notification Register. This register is maintained by the Project Risk Manager and is updated on a regular basis.
1.6(2)	Resources required to assure PS compliance should be involved in contract audits	X			PS compliance has been made explicit in the Contract for each contractor. In addition, the requirements of each PS with respect to project activities has been embedded into the Environment and Social Management Plan and supporting plans for the project activities. The plan shall be used as the basis for internal and external audit of both TEPU and its contractor activities.
1.6(2)	Clarity is required in the Project and in contracting documents on which body is responsible for obtaining permits.	X			The requirements for ensuring compliance with legal requirement has been incorporated into the contract of each contractor scope.
1.6(2)	For small contractors who do not have the capacity to obtain permits, attention is needed to facilitate contractors getting the permits.	X			This shall be assessed on a case by case basis depending on capacity of contractor. E&S Teams are involved in supporting contractors to obtain the necessary Environmental permits as required by the project teams.
1.6(2)	Clearly define the responsibility within each contract for ensuring legal compliance.	X			Refer to 1.6(2)
1.8	Ensure clarity with contractors on responsibilities for development of the Project Briefs. If the responsibility is with the contractors, the requirements for the quality of the Project Briefs need to be clearly defined in the contract.		X		The responsibility for the preparation of project briefs for activities within the Tilenga project footprint shall be managed by TEPU in line with EIA Regulatory and IFC requirements. For associated facilities under the operatorship of a third party e.g. waste management, borrow pits, quarries etc, the responsibility for obtaining the necessary approvals under the EIA regulations and other associated Env legislation shall lie with the operator of the facility.

1.8	Get clarity on who is responsible for: - Obtaining construction materials (shared service or construction contractors) as this affects the contract conditions. - Permitting (Project or contractors). If the responsibility is with the contractors, the requirements for the permits need to be clearly defined in the contract.		X		Obtaining construction materials is the responsibility of the contractor. TEPU is responsible for obtaining permits.
1.9	Consider developing a document that collates the full project impacts and mitigations for Tilenga Project & Tilenga Feeder Pipeline	X			The Tilenga and Feeder project Environment and Social Management Plans include all impacts and mitigation measures. These documents shall be reviewed on a periodic basis as the project progresses in line with IFC requirements and the principle of "adaptive management".
1.9	As a priority further attempts should be made to establish the Regional Cumulative Impacts Management (RCIM) as this will take some time to launch and some of the aspects will need addressing as prior to Project implementation e.g. influx.		X		A full scope of work has been drafted for the management of cumulative impacts which includes the development of a CIMS strategy, stakeholder mapping as well as establishment of the Regional Cumulative Impacts Management Forum. This requires JVP approval and was identified as part of the ENV work program in 2020. This scope has been incorporated into the ENV work program for 2021 following transfer of LA-2 operatorship.
1.9	Joint planning is required between Tilenga, Kingfisher and EACOP to address cumulative demands for resources and infrastructure and services. Since such demands will occur from an early stage in Project implementation and solutions may take some time to initiate, attention is required as a priority.		X		Refer to 1.9. CIMS scope of work shall be undertaken in partnership with JVPs, EACOP and other developers. This has been clearly identified in the scope.
1.9	Resettlement planning should be cognisant of the potential for double resettlement of households, which should be avoided.	X			Avoidance studies were conducted.
1.10	Build capacity of local suppliers to understand the importance of good E&S practice and IFC requirements. This should apply to pre-qualification capacity building	X			E&S practice and requirements are incorporated into the contracting process. Local contractor forums are being conducted.
1.10	The information sessions run for bidders should be expanded to cover all the PS topics such as labour requirements.		X		Materials to ensure that contractors understand their responsibilities for compliance with PS with respect to their scope are planned for 2021. This shall coincide with mobilization and is part of the E&S work program for 2021.
1.10	The H&S training to be provided to selected contractors should be extended to cover E&S requirements.	X			This happens in country already and will be extended to other contractors in 2021 as they come on stream. Materials to ensure that contractors understand their responsibilities for compliance with PS with respect to their scope is planned for 2021. This shall coincide with mobilization and is part of the E&S work program for 2021.
1.10	Adequate Project resources should be in place to support the capacity building of contractors with an adequate timescale to allow capability development prior to when it is needed.		X		The organigram for ENV team and also the project team includes adequate provision to support contractors for implementation of ESMP requirements including a dedicated ENV Engineer based in EPSC contractor office and one dedicated to project team to support EI and Drilling. The team based at KLA and site has also been developed to ensure adequate support is available once contractors have mobilized to the field.
1.10	The Project should develop E&S resources and tools to explain to contractors the E&S expectations and assist contractors explaining to their staff.	X			This has been in place and is again a part of work program 2021. Scope has included development of training materials for contractors and this year will include additional ENV resources for understanding ESMPs requirements and for use by contractors.
1.11	Include engagement with authorities on regional / masterplans into current SEP.	X			A consultation process with civil society and ministries and authorities was undertaken for the ESMP and supporting management plans. In addition, specific plans include the requirement to consult on an ongoing basis. SEP is to be updated to incorporate this requirement.
1.12	RAPS2-5 should also identify vulnerable PAPs, and develop priority programs for implementation.	X			Programmes have been developed under livelihood.
1.12	Include the social support program for vulnerable HHs in the CCEDLP.	X			Households execution is in the RAPs and not the SMPs because the later are community level initiatives but this is done.

#### Management Programmes

1.13	In the finalisation process, there is a need to ensure that there are cross-functional inputs: e.g. a strategy and suite of management plans (MPs) for biodiversity to cover all aspects of PS6 (Biodiversity Strategy, Biodiversity and Ecosystem Services MP, plus a number of other PS6-related plans). On PS 2 a labour MP has been drafted but requires input not only for areas with clear HR responsibility (IFC PS requirements on for example, working conditions, collective bargaining and so on), but also on issues that go across functions, such as influx. There is an opportunity to use this transition period following completion of the ESIA's and before contractors are onboard to get engagement and ownership for relevant teams prior to implementation.	X			The suite of ESMPs has been developed and submitted to the authorities including Biodiversity Strategy, Biodiversity and Ecosystem Services Management Plan (BESAP), Biodiversity and Ecosystem Services Management Plan (BESMP), Site Clearance Plan, Site Restoration Plan, Alien Invasive Species Management Plan, Wetlands Management Plan. The requirements of the ESMP and all supporting management plans have been embedded into the contract and have been provided to all contractors.
1.14(2)	Since the CFTs are at the clarification stage there is the opportunity for E&S to input to the process through clarifications. Going forward, the E&S teams need to be an integral part of the bid process from the outset to help manage the risk of contractor performance.	X			As above, all ESMPs have now been embedded into the CFT documentation.
1.14(2)	Since these gaps relate to the ability to manage E&S performance of contractors and thus meet Project commitments it is important to ensure that contractors allocate appropriate resources to fulfil E&S requirements. If this is not done, the outcome will be that the Project requirements are only partially met or are not met at all. Capacity building should be undertaken with the Uganda HSE and E&S teams to facilitate input to the CFT process.		X		Capacity building of contractors will be implemented through dedicated support to ensure that the requirements of ESMPs (incorporating all ESIA, IFC and good international industry practice - GIIP) are met. Training material shall be developed for use.
1.14(2)	ESIA to be included in CFTs and to be issued to technically qualified bidders for ongoing CFTs.	X			All ESMP and supporting management plan requirements have been embedded into CFT documentation for packages that have been issued for tender including Enabling Infrastructure, Drilling and EPSCC.
1.14(2)	Bidders should be provided with the full list of plans and requirements as part of the bid clarification process.	X			All bidders have been supplied with the full list of plans and requirements.
1.14(2)	Specific E&S (as opposed to HSE) bid review criteria should be developed to highlight Project needs and allow differentiation between bidders.	X			Bid review criteria were developed to assist project teams with the bid evaluation. A dedicated resource has been mobilized to ensure the bid criteria are applied during the bid evaluation phase.
1.14(2)	The E&S bid evaluation scoring needs to make a meaningful contribution to the overall scoring. Consideration could be given to an overall pass / fail for E&S.	X			An overall pass/fail mark was introduced for E&S as part of the bid evaluation.
1.15(1)	Establish an action tracking system for the Mitigation Checklist, which shall be updated with any additional measures as they are defined. A project information system such as Borealis can be used.		X		At contract award, a system for tracking compliance with mitigation actions shall be implemented using the project ESMPs as the basis. In addition, any design changes resulting in additional mitigation measures shall be added and ESMPs updated accordingly.
1.16(1)	Ensure that KPIs are adequately specific so that evaluation is meaningful.	X			A full set of E&S KPIs is in place and will be monitored on an ongoing basis.
	The biodiversity mitigation budget appears to be on low side and in view of the need to progress with some mitigation activities (see PS6 discussion), then budgets should be reviewed. The social mitigation budget also appears low and will need to be revised as program activities in all SMPs are finalised.	X			A review workshop was held to define the required budgets for impacts management. These numbers shall be revised based on discussions with contractors and following the net gain piloting program. Budget for implementation of biodiversity mitigation measures has been incorporated into yearly budget and as part of affiliate long term planning process.
1.16(2)	The Project needs to build into ESMPs sufficient time and resources to engage and reach agreement with third parties, to formalise and implement coordinated mitigation measures.	X			A consultation process for the initial draft of the ESMPs was undertaken in August 2020. Comments received were addressed and incorporated into updated documents submitted to NEMA.
<b>Organisational Capacity and Competency</b>					
1.17(1)	Enhance numbers of E&S staff and build capacity of staff to address a Project of this scale being undertaken in accordance with IFC standards.	X			A revised project organigram to cope with the post FID scope has been designed and approved and recruitment is ongoing.
1.17(1)	Ensure that all staff with a responsibility to implement E&S risk management measures are aware of, and able to implement, their requirements.	X			All project teams (affiliate, engineering and drilling) have been provided with training in IFC requirements. Capacity building of ENV and Soc teams has also been undertaken via HQ team including deep dive performance standards training undertaken in Nov 2020.
1.17(1)	Plan staff resources for the swift Project implementation that will follow FID.	X			A revised project organigram to cope with the post FID scope has been designed and approved and recruitment is ongoing.
1.17(1)	Since having adequate staff resources in place is a Project risk, this aspect should be included in the Project risk register and managed as a risk.	X			This will be incorporated into the project risk register.

1.17(1)	Establish cross-departmental forum involving all teams who have some responsibility for implementing PS requirements. The forum should address combined management of E&S, facilitate joint development of solutions to challenges and provide a mechanism to escalate issues for management attention.	X			All departments that have responsibility for implementing PS requirements are led by one member of the affiliate Leadership Team. There is a weekly coordination meeting on all aspects of implementation and challenges are highlighted and escalated as required for additional support or Senior Management attention.
1.17(1)	Identify capacity building needs with Project partners and put programmes in place.		X		Capacity building with partners and authorities is already being undertaken through technical committee meetings and working groups such as the BLAC. In addition, it is planned to set up further industry working groups and joint committees to address specific impacts including oil spill contingency planning and cumulative impacts management.
1.17(2)	The E&S risks and PS requirements need to be understood and supported throughout the management structure.	X			E&S risks are a key focal point for the management team and as such more resources have been dedicated to the teams to ensure that requirements are fulfilled.
1.17(2)	Management attention is required prior to FID on the requirements for E&S management enshrined in the management plans.	X			E&S risks are a key focal point for the management team and as such more resources have been dedicated to the teams to ensure that requirements are fulfilled.
1.1.8	Undertake awareness raising and training to ensure that PS requirements are understood by technical staff who have responsibilities for aspects of the PSs.	X			All project teams (affiliate, engineering and drilling) have been provided with training in IFC requirements. Capacity building of ENV and Soc teams has also been undertaken via HQ team including deep dive PS training undertaken in Nov 2020.
<b>Emergency Preparedness and Response</b>					
1.21(1)	In the absence of agreed protocols, formalise arrangements between the Project and authorities	X			The affiliate has responsibility and long established protocols for emergency response and reporting in the field is through the
<b>Monitoring and Review</b>					
1,22	Ensure that the monitoring and evaluation programme is designed to allow Project-induced changes to be apparent (e.g. monitoring targets set, appropriate frequency of monitoring, criteria of acceptable change defined).  The monitoring programme should ensure that there is sufficient analysis of trends to facilitate understanding of underlying patterns and allow separation of project from non-project impact.		X		A monitoring program is being formalised and will monitor project and non-project impacts through key performance indicators.
1,22	Sufficient field staff need to be in place during construction – the requirements for field staff are often under-estimated in projects. All field staff should be employed sufficiently far in advance of construction to allow them to be trained and familiar with mitigation measures, site conditions, verification procedures and reporting requirements.		X		The whole E&S organisation (including field staff) has been reworked to cope with the post FID workload. Recruitment is ongoing.
1,22	Consideration should be given to external monitoring during Project implementation e.g. third party labour monitoring and third party grievance monitoring.	X			This has been taken into consideration in the SMP monitoring and evaluation plan
1,22	Participation of Affected Communities in monitoring activities should be confirmed through SMPs.	X			This has been taken into consideration in the SMP monitoring and evaluation plan
1,22	Finalise KPIs within the SMPs.	X			This has been done in the SMPs.
1,22	Ensure that senior management are actively engaged in reviewing the outputs of ESMS performance reviews and support adaptive management.	X			This is in place, weekly performance is reviewed at the local Senior Manager level and further reported to the affiliate Senior Management and corporate reporting.
1,24	Develop Terms of Reference for the Societal Steering Committee (with representation across TEPU, gov't and communities) as the vehicle for ensuring crossfunctional participation in SMP implementation.		X		This is in draft and will be finalised in H1 2021.
1,24	Consider forming an Environmental Steering Committee akin to the societal Steering Committee (covering those aspects which do not require input from the social team).		X		This will be implemented at FID
<b>Stakeholder Engagement</b>					
1,25	Amend the SEP to include that Project requirements include compliance with IFC PSs (PS1).	X			This has been done in 2019.
1,26	Strengthen the SEP with additional detail on what, how, frequency, responsibilities of stakeholder engagement (i.e. an action plan, Table 12)	X			This has been done in 2019.
1,27	Include Vulnerable groups as a category in the SEP; describe the differentiated measures of engagement with this group.	X			This is in the RAP SEP.
1,31	Include principles and applicability of Informed Consultation and Participation (ICP) into the SEP.	X			This has been included in 2019

<b>External Communications and Grievance Mechanism</b>				
1,34	Since best practice is to undertake some form of external reporting, consideration should be given to external reporting frequency, coverage, audience and mechanisms. External communication should include methods to: (i) receive and register external communications from the public; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track, and document responses, if any; and (iv) adjust the management program, as appropriate.  Note: Projects are encouraged to make publicly available periodic reports on E&S sustainability	X		External communication is incorporated within the SEP.
1,34	Consider an E&S dashboard type of summary reporting. This would require allocation of a team resource to compile.	X		This is in place for all aspects of E&S.
1,35	Include timeframes into the GM flowchart. Strengthen contractors GM requirements (inc. their reporting requirements to Tilenga).	X		This is in place.
1,35	The GM Procedure (2017) should be updated to reflect updated process and systems.	X		This has been updated in 2020.
1,36	Strengthen GM (including procedure) to include reporting back to Affected Communities on summary grievances and their resolution.	X		This has been done in 2020.
<b>PS 2: Labour and Working Conditions</b>				
<b>Working Conditions and Management of Worker Relationship</b>				
2.8	Review and update the Harassment Policy (L2-POL-HR-01).	X		Done in 2019.
2.8	Draft and disclose the Labour Strategy and Labour Management Plan.	X		
2.9	Update the Regulation for the Rules of Administration of Kampala and Field Based Staff (L2-REG-ADM-02) to include reference to international standards reflecting project commitments, as well as current work context.	X		Done as part of Labour Management Plan.
2.10	Draft the Labour MP including commitments provided for in the ESMP. Working Conditions and Management of Worker Relationship, including: · Working Conditions & Terms of Employment including minimum wages, working hours and rest time; Workers' Organisations and Freedom of Association; Non-Discrimination & Equal Opportunity; Retrenchment; Anti-harassment and Management of Grievances (Employee Grievance Mechanism for all workers). · Occupational Health & Safety including the provision to all employees and workers of PPE in good condition and free of charge; · Workers Engaged by Third Parties; and · Procurement and the Supply Chain	X		Done as part of Labour Management Plan.
2.11	The Labour MP commitments should be strengthened to specifically reference avoidance of unethical recruitment and contracting terms for migrant workers. This will also need to be reflected in CFT documentation.	X		Done as part of Labour Management Plan
2.12	Develop the Workforce Accommodation Plan, as per commitments, and including applicability to contractor/subcontractor camps in the Aol. This should also be appropriately referenced in CFT documentation.	X		Done as part of Labour Management Plan.
2.13	Reflect the commitment to compliance with national Labour laws in the Project's Labour policies (e.g. Ethics Charter, Disciplinary Code, Total Code of Conduct, as appropriate).	X		Done as part of Labour Management Plan.
2.16	Draft the Labour MP in compliance with national labour laws, and international labour conventions including discrimination (Employment and Occupation) Convention, 1958 (No. 111)	X		Done as part of Labour Management Plan.
2.18	Develop the Retrenchment Plan as per commitments: · Analysis of alternatives and measures to minimise adverse impacts of collective dismissal including notification of public authorities, and provision of information to and consultation with workers and their organisations. · Requirement for contractors to include a Workers Demobilisation Plan	X		Done as part of Labour Management Plan and captured in the Grievance Procedure.

2.20(1)	Highlight the worker grievance mechanism in the Social Strategy; the worker grievance mechanism must be provided for in the CFT documentation, and also in contracts for contracted workers. The mechanism is to ensure workers can raise workplace concerns.	X			Done as part of Labour Management Plan and captured in the Grievance Procedure.
2.20(2)	Ensure the documented mechanism provides for anonymous complaints.	X			Done as part of Labour Management Plan and captured in the Grievance Procedure.
	Ensure the mechanism provides for other access to remedy including arbitration or collective agreements.	X			Done as part of Labour Management Plan.
	<b>Protecting the workforce</b>	X			
2.21(1)	The Labour MP is being drafted and should provide for compliance with child labour requirements (include mechanisms for ensuring forced labour is not employed).	X			Done as part of Labour Management Plan.
2.22	The labour management procedure should include mechanisms for ensuring forced labour is not employed.	X			Done as part of Labour Management Plan.
	<b>Workers engaged by Third Parties</b>	X			
2.24	Labour MP procedures will need to document auditing of third-party providers to ensure their consistency with project labour commitments.	X			Done as part of Labour Management Plan.
2.26	Ensure contracted workers have access to a grievance mechanism (GM), including the Project's GM if the third party is not able to provide	X			Done as part of Labour Management Plan.
	<b>Primary Supply Chain</b>				
2.27	Reflect mechanisms for ensuring child and forced labour are not used in the Project supply chain in the forthcoming Labour MP, in line with Project commitments and national legal requirements.	X			Done as part of Labour Management Plan.
<b>PS 3: Resource Efficiency and Pollution Prevention</b>					
	<b>Pollution Prevention</b>				
3.4, 3.5, 3.10, 3.11	As part of Detailed Design the Project should prepare a summary of the actions taken to minimise visual impact and how those choices compare to best practice and including the rationale as to why no further action can be taken, given the potentially significant residual impacts on receptor.	X			The actions required to reduce visual impact have been described in the Landscape and Visual Management Plan. As part of ESMP development a review against best practice was undertaken.
	Any additional hydrological and morphological impacts for the Victoria Nile Ferry Crossing to be captured in Detailed Engineering processes.			X	Removed from project scope because UNRA bridge now confirmed therefore the ferry will not be used.
	The Project to continue their development of the project OSCP as a priority.		X		OSC planning commenced in 2018 for the project including oil spill modelling, fluid testing and sensitivity mapping. Consultation with the authorities is ongoing regarding the requirements of the NOCP and the OSR.
	Other management plans to be updated per the ESMP Program schedule.	X			ESMP Rev 1 submitted to authorities in October 2020.
	<b>Greenhouse Gases</b>				
3.7, 3.8	The Project will need to report on GHG emissions annually.	X			The requirement for this has been included in the Emissions and Dust Control Plan, and Physical Environment Monitoring Plan
	<b>Resource Efficiency</b>				
3.6	If there are major changes regarding water supply, the Project will need to consider how this is permitted. The options will be to complete Project Briefs for water abstraction facilities or to go through the management of change process with NEMA.	X			The project base case has not changed. If changes do occur they will be subject to a management of change procedure.
3.9	The Project will develop criteria for resource management and energy efficiency with each contractor depending on the scope	X			Clear standards for resource efficiency were included in the Env Optimum Requirement document at the FEED stage. Further follow up with the EI and EPSCC contractors will be required at contract award to ensure efficient use of resources.
	<b>Pesticide use and management</b>				

3.14	<p>It is possible that pest/ vector management will be required during on-site Project implementation activities e.g. mosquitoes at camps, for weed control activities (including in relation to invasive alien species).</p> <p>If applicable to the workscope, CFTs and contracts should include requirements for contractors to:</p> <ul style="list-style-type: none"> <li>-determine the need for pest and / or vector management;</li> <li>-apply criteria in the selection and management of pesticides to minimise environmental and human effects (workers and communities);</li> <li>-develop and implement an integrated pest and / or vector management approach;</li> <li>-apply GIIP to handling, storage, application and disposal of pesticides;</li> <li>-comply with WHO recommendations on pesticides;</li> <li>-ensure appropriate training and supply of equipment and facilities for pesticide handling, storage, application, and disposal.</li> </ul>	X			<p>This is established through alien invasives species management plan and will be followed up with each contractor with respect to specific requirements relative to their scope of work. In addition each contractor will have to have an onsite safety plan that addresses all aspects of onsite safety including management of disease spreading insects and handling of chemicals.</p>
<b>PS 4: Community Health, Safety and Security</b>					
<b>Community Health and Safety</b>					
4.5(2)	<p>Establish a coordination forum with Kingfisher (similar to BLAC but rather with a focus on common CHSS issues: influx, disease prevention, road safety).</p>	X			<p>This will be formalised and a quarterly review held.</p>
4.6(1)	<p>Ensure residual risks to community health and safety are included in the Community Health, Sanitation, Safety and Security Plan (CHSSSP). Ensure that restrictions on open trenching are reflected in the CHSSSP required of bidders in the CFT documents.</p>	X			<p>These are included in the CHSSP.</p>
4.6(5)	<p>Ensure that the updated Road Safety and Transport Management Plan (RSTMP) includes all ESIA commitments and is also informed by the Road Safety Initiative; this action is recommended as a high priority given volumes of traffic that will become operational.</p>	X			<p>All commitments are in the Safety and Transport plans respectively. In addition a road safety strategy is being developed for the construction period and then for future operations after first oil.</p>
4.10	<p>Finalise the draft Social Strategy and ensure clear ownership of all aspects of influx management are clearly defined by the appropriate teams. Ensure all internal teams are fully engaged in mapping out requirements relative to influx management and reflected into CFT documentation.</p>	X			<p>Social Mgt Strategy finalised and contractors have been made aware of and will be managed through the ESMPs requirements which addresses the influx management.</p>
4.11(2)	<p>Document and prepare for disclosure to stakeholders the Emergency Response Plan (ERP)</p>		X		<p>The ERP will be shared with stakeholders at all relevant levels Internal and External.</p>
<b>Security Personnel</b>					
4.12(2)	<p>Include provisions on security personnel in the forthcoming Community Health, Sanitation, Safety and Security Plan (CHSSSP) that:</p> <ul style="list-style-type: none"> <li>• Meet the Project's commitments to the Voluntary Principles on Security and Human Rights (VPSHR);</li> <li>• Explicitly provides for access to the grievance mechanism;</li> <li>• Reflect the Project's approach to use of public and private security forces e.g. provision of adequate training on VPSHR, force and firearms.</li> </ul> <p>This CHSSSP should then be publicly disclosed.</p>	X			<p>These provisions are all provided for in the security section of the CHSSSP. Security department is already managing and delivering VPSHR training to all security personnel deployed to protect company assets and will continue to do so.</p>
<b>PS 5: Land Acquisition and Involuntary Resettlement</b>					
5.10(1)	<p>Identify host communities [for resettled PAPs] in RAP1 and include them in stakeholder engagement plans.</p>	X			<p>All PAPs in all RAPs are included in our stakeholder engagements, there is no distinction between those that have been resettled from RAP1 or those to be resettled from RAPs 2-5.</p>
	<p>Review the 5-year RAP budget, informed by the RAP1 planning and implementation experience to date. In particular, revise the Stakeholder Engagement budget (Note that RAP 1 SE budget was half of overall RAP planning budget).</p>	X			<p>This is being implemented at this time. It will be finalised before end of January 2021.</p>
5.10(2)	<p>Strengthen information disclosure regarding rates calculations, including with government on rates once published. Also consider other common grievances / issues and review engagement and information disclosure on these topics.</p>	X			<p>Disclosure meetings are held with the stakeholders and these include updates on grievances as appropriate.</p>
	<p>Include host communities in monitoring (indicators and methods) and reporting.</p>	X			<p>TEPU engages host communities on current indicators and reporting. This will be formalised and continue as a part of the next phase of implementation of RAPs 2-5 and retrospectively with RAP 1.</p>

5.11	Provide for the active participation, engagement and capacity building of the Resettlement Planning Committees (RPCs) for each RAP to ensure consistency in grievance resolution actions.	X			Ongoing.
5.12(1)	Finalise preparation of RAPs 2-6. Provide for unanticipated land take in the RAPs. Develop a district level Land Use Plan in line with ESIA commitments. Use JV partner structures to coordinate on land use planning in the Basin more widely.	X			Done as part of RAP 2-5 planning, ESIA studies.
5.13	Prepare a specific legal framework for compulsory land acquisition prior to its initiation (RAP1, potentially others) for disclosure and agreement with relevant government authorities. Strengthen coordination with authorities on encroachment and opportunistic settlement after the cut-off date, particularly in sensitive environments (e.g. wetland areas).	X			Completed before RAP 1 implementation.
5.14	Revise the RAP1 M&E framework to reflect lessons from the work to date, and should have consistency with RAPs2-6.	X			Completed before RAP 1 implementation.
	Include indicators of biodiversity in the M&E framework.	X			Established through the Biodiversity and Ecosystem Services Monitoring Plan.
5.15	Conduct regular internal implementation monitoring and track corrective actions.	X			Weekly implementation meetings are held and the status of corrective actions is updated.
	Incorporate lessons learned from internal monitoring into RAPS2-6.		X		This is being developed.
5.19	Strengthen support available to vulnerable households during implementation, and particularly at critical times such as during agreement making processes, prior to documenting agreements (e.g. Minutes of Attendance).	X			This was implemented during RAP 1 and will be continued during RAPs 2-5.
5.22	Provide relocation assistance to tenants.	X			This was implemented during RAP 1 and will be continued during RAPs 2-5.
	Reconvene the JV partners internal LAR Steering Committee to establish consistency of approach on future land tenure.		X		This was done until suspension of activities and is planned to resume with RAP 2-5 implementation.
5.23	Continue to disclose information to communities on grievances summaries including rejected compensation of encroachment following the cut-off date.	X			This was implemented and enacted during RAP 1 and will be continued during RAPS 2-5.
5.23	Publish lessons learned for communities from RAP1 in advance of RAPS2-6.		X		This will be implemented.
5.28	Ensure C&P has a clear line of sight of ESIA commitments and requirements including external implementation of livelihoods programs (e.g. cost saving should not threaten programme sustainability).	X			ESIA commitments have been made explicit within main contractor scopes. Contract includes reference to all ESMPs relative to contractor scope of work.
5.28	Consideration of ecosystem services needs to be strengthened, including with partner organisations in implementation. This should include at minimum strengthening on the specifics for medicinal plants, thatch and firewood.	X			Approach has been established through the BESAP and Net Gain Program as well as the Livelihood Restoration Programs.

### PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

	<b>Updated PS6 Guidance Note:</b>				
6.0	Following the gap analysis of the Project position with the revised GN, an action should be developed with a timetable to bring the Project in line with the revised GN.	X			Gap analysis completed in 2019. The Biodiversity and Ecosystem Services Action Plan (BESAP) was updated to incorporate the revised requirements.
	As far as feasible, requirements of the new GN should be incorporated as soon as possible and reflected in the Biodiversity Strategy.	X			As per above - BESAP updated with new requirements.
	<b>General</b>				
6.6	Have a clear set of criteria to determine when: (1) E&S involvement is required in design changes (2) NEMA need to be consulted on changes.	X			The TEPU Management of Change Procedure L2-PRO-HSE-03-03 has been amended to include the process by which all entities must follow in event there is a change to the approved ESIA's. The process also includes requirement for consultation and notification to authorities.
	E&S teams to be fully involved in management of change process for design changes (when the conditions for evaluation are met).		X		As per above, the Management of Change Procedure includes the specific roles and responsibilities of each department including Environment and Social.
	Adequate resources to be retained for E&S analysis of changes during detailed design.	X			Dedicated Env Engineer has been in position to ensure that requirements are fully captured with respect to design changes at CFT stage. At contract award an ENV Engineer shall be in position for EPSC phase to ensure that all requirements are captured as per the requirements of the ESIA and MoC procedure.



	Timing of studies should be planned to ensure that there is sufficient time and flexibility e.g. in Project design, schedule, to be able to respond to study findings.	X			The ENV work program has identified a number of supporting studies for engineering and the work program for ENV has been designed in consultation with the package managers to ensure they are carried out in due time. Weekly coordination meetings are held with the Environmental Infrastructure (EI) team at present to ensure sufficient Env support is required.
6.6	Consider liaison with Kingfisher and EACOP to develop an Albertine Graben combined critical habitat analysis (CHA).	X			The CHA has been completed for Tilenga and EACOP. Further habitat mapping is planned for Feeder pipeline to identify areas for further study using recently purchased satellite imagery. CHA for Kingfisher shall be reviewed in context and as part of the cumulative impacts management workscope. Engagements ongoing.
6.7(1)	Continue application of the mitigation hierarchy in detailed design.	X			As per above, dedicated Env Engineer will be based within EPSC office to ensure that mitigation hierarchy continues to be implemented for detailed design and construction planning phase.
6.7(2)	Ensure that the E&S teams have the ability to initiate the management of change procedure.	X			Roles and responsibilities for all E&S are clearly defined in the MoC procedure.
	Sufficient verification field staff need to be in place during construction – the requirements for field staff are often under-estimated in projects. All field staff should be employed sufficiently far in advance of construction to allow them to be trained and familiar with mitigation measures, site conditions, verification procedures and reporting requirements.	X			The field team organisation has been proposed and agreed for post FID. It will be sufficiently staffed and recruitment is underway (includes one Field Supervisor who shall have sufficient knowledge and experience of project and biodiversity related aspects to capacity build the field team. Under direct supervision of this position will be 4 x EBFOs and 8 x ECOs to ensure that adequate resources are available to guide and monitor contractor field teams).
	Ensure that Project and Contractor management plans and contractor standard operating procedures (SOPs) and method statements are updated in response to changing requirements and that changes are effectively communicated throughout the Project and the contractor organisation.		X		Contract document explicitly requires contractors to produce their own set of management plans for E&S (aligned with the company ESMP and supporting plans) relative to their scope of work.
	Define specific targets for performance measures to indicate what success looks like.	X			KPIs are clearly defined in the ESMP supporting management plans.
	Ensure that there is sufficient analysis of trends to facilitate understanding of underlying patterns.		X		Trending and interpretation of data needs to be addressed for physical environment and biodiversity monitoring. Investment in appropriate software and capacity building in interrogation of data requires to be undertaken.
6.8(1) & 6.8(2)	The BLAC composition should reflect the changing needs of the Project as it moves towards implementation. In particular, input of expertise on the biodiversity compensation and enhancement would be helpful.		X		Terms of Reference of the BLAC is currently under review. Membership of BLAC will be amended depending on the need for specialities e.g marine. The core of the committee will remain biodiversity and livelihood focused. BLAC will be renamed IBLAC (I standing for independent).
<b>Protection and Conservation of Biodiversity</b>					
6.10(2)	An early decision is required on the governance structure for the No Net Loss / Net Gain (NNL / NG) programme as this will affect the development of the programme.		X		The NG program is sufficiently mature technically to allow the piloting phase to commence. Discussions are currently underway on the initiatives and the responsibilities for implementing and monitoring effectiveness of the initiatives. The piloting phase is part of the work program for 2021 and will include an assessment of appropriate governance and finance models for the long term roll out.
6.10(2)	There is a need for focused planning and implementation of NNL / NG actions to progress the programme in order to achieve the targets in a timely manner.	X			The Net Gain Implementation Plan (NGIP) is part of the Biodiversity and Ecosystem Services Action Plan (BESAP) and is well defined in terms of activities. Resources are currently being recruited and engagements with the authorities on implementation well underway. Looking beyond the pilot phase, we are ensuring additional sufficient planning for scale up of activities.
6.10(2)	To this end, adequate resources (numbers, technical expertise) need to be utilised to develop the programme. As the NNL / NG programme is defined, adequate resources (numbers, specific relevant expertise) need to be involved in the development and implementation of initiatives.		X		Resources are currently being recruited and engagements with the authorities on implementation well underway. It is planned to mobilize an additional Biodiversity Specialist with the necessary expertise and experience of biodiversity offsetting to ensure that the Biodiversity Coordinator for the affiliate is given the correct level of technical support. This recruitment is expected to happen Q1 2021.
6.10(2)	Involvement of expertise on maintenance of livelihoods and alternative livelihood strategies and community consultation should be a key consideration from the early stages of planning any initiatives.	X			The NGIP has been devised with community participation as a key focus. The pilot phase will include a selection of initiatives that will have community involvement and participation.

6.10(2)	Establishment of a co-ordination structure between Tilenga, Kingfisher and EACOP to actively manage development of the NNL / NG programmes.	X			The NG Implementation Plan for Tilenga area has been established. BESAP development for the Feeder pipeline shall commence in 2021 and shall align with the requirements of the NGIP for Tilenga. Collaborative initiatives e.g. chimpanzee survey and monitoring shall be undertaken in consultation with Tilenga, EACOP and Kingfisher.
	The Project should progress with plans to facilitate integration of stakeholders - government, other projects, conservation organisations - to develop the NNL / NG planning in an integrated manner at the landscape level and improve chances of success. It is suggested that a focal point is identified to drive this forward. This may be an NGO representative or possibly a member of BLAC.	X			Consultation with the PAU and the authorities responsible for implementation of the initiatives has been undertaken in the first phase. As part of the detailed planning and feasibility, consultation with community, district and civil society will be undertaken relative to the scope of the initiatives to be piloted. In addition, BLAC work plan for 2021 will include an item to develop a scale up strategy and provide guidance on roll out of the NGIP.
6.10(3)	Lessons learned from the implementation of other offset programmes should be collated and applied in the development of the NNL / NG programme. As well as research studies, conference papers other valuable inputs could be supplied by paying experts to provide inputs of Project experience.	X			Lessons learned from offsetting programs has been taken into account for the development of the Tilenga BESAP and shall also be done for development of the Tilenga Feeder BESAP.
6.10(4)	As the NNL / NG programme is defined, ensure that adequate resources (numbers, specific relevant expertise) are involved in the development and implementation of initiatives, including social expertise regarding maintenance of livelihoods and community liaison.		X		Resources are currently being recruited and engagements with the authorities on implementation well underway. It is planned to mobilize a Biodiversity Specialist with the necessary expertise and experience of biodiversity offsetting to ensure that the Biodiversity Coordinator for the affilaite is given the correct level of technical support. This position shall also be responsible for engaging the Social Affairs team to ensure that community and livelihood aspects are taken into account and fully aligned.
6.14	E&S teams to be consulted as part of the management of change (MoC) process for design changes which could adversely affect natural habitat and an appropriate level of impact evaluation undertaken.	X			Roles and responsibilities for ENV are clearly defined in the MoC procedure.
	Ensure a robust analysis of alternatives for Project changes that could affect natural habitat.	X			Criteria including biodiversity impacts have been established for the assessment to be conducted for any design change proposed as per the requirements of the MoC procedure.
	Undertake stakeholder consultation regarding Project changes which could impact biodiversity values in natural habitat.		X		This shall be undertaken pending the outcome of the MoC process for the design change proposed.
6.16	Consider the best time to re-evaluate critical habitat in terms of the revised triggers in GN6.	X			GN6 gap analysis including revised triggers have been included in the BESAP.
6.17	Critical habitat analysis and impact evaluation needs to be extended to cover any new area of influence identified as the Project develops.		X		This will be identified as part of the criteria for assessment as per the MoC procedure.
	E&S teams to be consulted as part of the management of change process for design changes which could adversely affect critical habitat and an appropriate level of impact evaluation undertaken.	X			Roles and responsibilities for ENV are clearly defined in the MoC procedure.
	Ensure a robust analysis of alternatives for Project changes that could affect critical habitat.		X		This shall be undertaken pending the outcome of the MoC process for the design change proposed.
	Undertake stakeholder consultation regarding Project changes which could impact biodiversity values in critical habitat.		X		This will be identified as part of the criteria for assessment as per the MoC procedure.
6.19	Consider how to demonstrate NG is achieved for critical habitat. Whilst the nature of interventions may be the same for NNL and NG, habitat and species targets need to be set to clearly aim for net gain for critical habitat. The aim for overall effectiveness of the programme need to be considered – NNL or NG – and this will partly depend upon the proportion of critical habitat in the programme.	X			The broad targets to achieve NNL/NG have been clearly defined in the Loss Gain Accounting Report for Tilenga and have been incorporated into the BESAP. Furthermore, the results of monitoring as defined under the BEMP and for the individual criteria developed as part of the detailed planning for each initiative will be assessed throughout the pilot phase. As the vast majority of Tilenga project area is critical habitat, these targets have been designed to achieve overall Net Gain to biodiversity as per GN6.
6.22(1) & (2), 6.23	Ensure coverage of invasive alien fauna, pests and pathogens in the IAS Management Plan (or provide an explanation that they are not a risk to explain why they are not addressed).		X		Alien Invasives Species Management Plan has been developed and shall be reviewed to ensure it incorporates this requirement.
<b>Supply Chain</b>					
6.30	Requirements around sustainability of supply of primary production should be included in contracts e.g. timber, thatch.	X			This requirement has been incorporated into the Contract.
	A ban on procurement of bushmeat should be included in contracts e.g. included in Project management.	X			This requirement has been incorporated into the Contract.
<b>PS 7: Indigenous Peoples</b>					

<b>Applicability</b>					
7.0	Ensure the Tilenga response is robust in specifically addressing each of the four criteria for triggering PS 7.	X			Addressed in the final ESIA report.
	Ensure that there is a documented response direct to the stakeholder who raised the issue during consultation.	X			Addressed in the final ESIA report.
	Make the Project response on Indigenous Peoples available to other stakeholders should this be requested.	X			Addressed in the final ESIA report.
<b>PS 8: Cultural Heritage</b>					
<b>Protection of Cultural Heritage in Project Design and Execution</b>					
8.6	Consider development/sponsoring of an ongoing program of research that builds on baseline developed in the ESIA, with a focus on establishing site chronologies, intangible heritage documentation, understanding paleoclimate, investigating pottery and salt making, and landscape archaeology.	X			Addressed in the final ESIA report.
8.7	Agree and document in the Cultural Heritage MP the additional avoidance, control and mitigation measures with the Uganda Department of Museums and Monuments, including on key issues such as relocation of spiritual sites or other critical cultural heritage, where spiritual leaders or other competent professional input is required.	X			This is captured in the Cultural heritage plan.
8.8(2)	Complete the CHMP. Update the Chance Finds Procedure based on lessons learned from RAP1.	X			Chance Finds Procedure has been updated following issue of the Cultural Heritage Management Plan.
8.8(3)	Confirm in organisational charts and updated Chance Finds Procedure that a team of appropriately skilled tangible heritage experts are engaged for the Project's ground-breaking activities.	X			These experts will come from respective institutions such as Museum, University and Gender and will not be internal employees.
8.12	Include definition of non-replicable CH and the required conditions for its removal, in Project documents (ESIA, ESMP, CHMP, CFP).	X			This is captured in the Cultural heritage plan.
8.13	Ensure that CHMP includes definition of Critical Cultural Heritage and identified management requirements.	X			This is captured in the Cultural heritage plan.
8.14	Include the specific requirements of free, prior and informed consent (FPIC) into the CHMP with regards to management of critical cultural heritage.	X			This is captured in the Cultural heritage plan.
8.15	Include the specific additional requirements for finds in protected areas into the CFP.	X			This is captured in the Cultural heritage plan.
<b>Air Emissions and Ambient Air Quality</b>					
G1.1.1	EHS 1 Emissions to air should continue to be studied, including modelled, following FID / in detailed design, including the technical configuration of the plant and operational modes. This will need to be a priority for Detailed Design.	X			Studies including air emissions studies have been undertaken for both FEED designs. The requirements that require to be addressed in terms of technology selection for the development are clearly defined in the FEED dossier. Further studies including air emissions modelling will be undertaken as part of EPSC scope under the direction of a dedicated ENG Engineer.
G1.1.1	EHS 2 With regard to emissions to air, detailed design work will need to include updating the best available technology (BAT) assessment, as applicable, for the final plant configuration.	X			BAT assessment has been conducted for both designs during FEED. This documentation shall be revised and updated as detailed of the finalized design premise are made available.
G1.1.1	EHS 3 If all alternatives are explored and there are still exceedances of emission limit values (ELVs) the Project will need to present a case for derogation justified by an impact assessment-based approach and BAT justification.	X			Revised decision document currently under preparation for selected design and also due to the application of East African Standard Air Quality Specification which has been adopted by NEMA which are more stringent than IFC standards. In addition, the BAT justification for the technology selection shall be updated under guidance from the Env Engineer based in EPSC office.
<b>Energy Conservation</b>					
G1.2.1	EHS 4 The Project will develop criteria for resource management and energy efficiency with each contractor depending on the scope. The Energy Management Plan and Energy Efficiency Maintenance Plans, or equivalent, should be added to the program of ESMP development.		X		The requirements for energy efficiency and energy management shall be developed during detailed engineering including the requirement to undertake a full energy efficiency study will be part of the EPSC contractor deliverables for both construction and operations phase.
<b>Noise</b>					

G1.7.1	EHS 5 Noise emissions are to continue to be studied following FID. Recommendations from Section 2.4 of the draft noise derogation will need to be a priority for Detailed Design and considered accordingly in the project planning (licenses and consents plan).	X			Studies including noise modelling have been undertaken for both FEED designs. The requirements that require to be addressed in terms of technology selection for the development are clearly defined in the FEED dossier. Further modelling will be undertaken as part of EPSC and drilling scope under the direction of a dedicated ENV Engineer with respect to the required levels as per the Noise Regulations.
<b>IFC EHS Guidelines – Onshore Oil and Gas Development</b>					
1.1.3	No additional actions required with regard to air emissions; just those that are already planned by the Project. This will be tracked from FEED design to Detailed Design.		X		Shall be followed up during detailed design phase as per answer to G1.1.1.
1.1.9	No additional actions required regarding decommissioning; just those that are already planned by the Project in terms of plan update as described in the ESIA.		X		Decommissioning has been addressed at a high level within the ESMP and supporting management plans with a clear commitment to ensure that all regulatory requirements are taken into account at decommissioning stage.
2.0.1	No additional actions required regarding environmental monitoring; just those that are already planned by the Project in terms of plan update and Contractor engagement.	X			Environmental Monitoring Program in place covering physical aspects and biodiversity. This is clearly identified in the Physical Environment Monitoring Plan and the Biodiversity Monitoring and Evaluation Plan.