

**Environmental and Social Action Plan (ESAP)  
Floating Storage and Regasification Unit (FSRU) - EL SALVADOR**

No.	Aspect	Action	Deliverable	Delivery date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>				
1.1	E&S Assessment and Management System	a. Prepare a comprehensive E&S governance memorandum, representing which party is responsible for the E&S management of the Project (including the implementation of actions in this ESAP) from conversion to decommissioning. The memorandum should also describe the ESMSs and ESMPs that the Project will implement during its life cycle to comply with IFC Performance Standard 01, as well as alignment with any independent certifications that may be sought (e.g. ISO 9001, 14001, 45001, etc).	a. E&S governance memorandum	a. Prior to Financial Close
1.2	Policy	Prepare a Project -specific E&S policy that covers the life span of the Project	a. Project-specific E&S policy submitted	a. Prior to Financial Close
1.3	Management Programs	a. Finalize the EHS bridging plan for the conversion phase that incorporates the Project-specific plans for the following aspects: i) solid waste management, including hazardous waste and oil spills; ii) resource efficiency; iii) wastewater and effluents management; iv) HAZMAT management; and v) labor management b. Finalize BWs EHS plan for the transportation phases. c. Prepare a Project-specific bridging ESMP/EHS plan or document for the preparation works and operational phase that includes: i) water use and monitoring; ii) GHG inventory and management; iv) air quality and emissions; v) solid waste management; vi) HAZMAT management; vii) noise and underwater noise; viii) wastewater management; ix) security management; and x) emergency preparedness and response d. Prepare a decommissioning framework for the Project.	a. EHS bridging plan for the conversion phase submitted b. EHS plan for the transportation phase submitted c. Project-specific bridging ESMP/EHS plan or document for the preparation (commissioning) works and operational phase submitted d. Memorandum describing the decommissioning framework for the Project submitted	a. Prior to First Disbursement b. Prior to March 31 <sup>st</sup> 2021 c. 30 days prior to the Project's Physical Completion Date. d. 30 days Prior to Project's Physical Completion Date
1.4	Organizational Capacity and Competency	Finalize the E&S organizational structure for the conversion, transportation and operations phases.	a. Preliminary E&S organization charts of Keppel, BW, and Invenergy E&S teams assigned to the Project, including reporting lines for the conversion, transportation, and operational phases submitted b. Final E&S organizational charts of 1) Keppel, 2) BW, and 3) Invenergy E&S teams assigned to the Project including reporting lines for the conversion, transportation, and operational phases submitted	a. Prior to Financial Close b. 1) , 2) three months prior to the transportation phase, and 3) 30 days prior to Project Physical Completion Date
1.5	Stakeholder Engagement	Provide input into the update process of EDP's SEP to include measures for annual reporting of FSRU operations to external stakeholders.	Updated Stakeholder Engagement Plan incorporating measures for the FSRU submitted	30 days prior to Project Physical Completion Date
1.6	External Communication and Grievance Mechanism	a. Disclose Project status, community grievance mechanism and contact details of designated FSRU contact point (e.g. CLO) to stakeholders b. Establish a Project website that includes key project information such as the ESIA and grievance forms.	a. Project disclosure report containing: i) minutes of meetings; ii) attendance registers; and iii) photographic evidence of grievance boxes submitted b. Project website with ESIA and grievance forms uploaded	a. 30 days prior to Project Physical Completion Date b. Prior to Financial Close

PS 2: Labor and Working Conditions				
2.1	Working Conditions and Management of Worker Relationships	Update employment contracts for the operational phase to also include details on deductions, leave entitlements, and overtime regulations and payment.	Updated worker contracts provided	30 days prior to Project Physical Completion Date.
2.2	Working Conditions and Management of Worker Relationships	<ul style="list-style-type: none"> <li>a. Provide shipyard worker accommodation and COVID-19 contingency plans to verify that adequate management systems are in place, to support and protect migrant workers and their living conditions</li> <li>b. Provide evidence that all Project furnished accommodations in the operational phase meet IFC/EBRD standards for workers' accommodation.</li> </ul>	<ul style="list-style-type: none"> <li>a. Shipyard worker accommodation and COVID-19 contingency plans submitted</li> <li>b. Worker accommodation plan for operational phase submitted</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to First Disbursement</li> <li>b. 30 days prior to Project Physical Completion Date</li> </ul>
2.3	Occupational Health and Safety	<ul style="list-style-type: none"> <li>a. Conduct a desktop working environment study for the operational phase of the FSRU to confirm that occupational noise levels will be within the regulatory limits in all new modules.</li> <li>b. Health and Safety Plan for the operational phase of the Project including policies and procedures to manage risks associated with COVID-19 based on guidance from the World Health Organization (WHO)</li> </ul>	<ul style="list-style-type: none"> <li>a. Copy of working environmental study submitted</li> <li>b. Health and Safety Plan for the operational phase submitted</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to first disbursement</li> <li>b. 30 days prior to the Project Physical Completion Date</li> </ul>
2.4	Workers Engaged by Third Parties	Include provisions in the procurement procedure for the transportation phase stating that random spot checks and audits of suppliers will also entail verification of their compliance with labor rights (and OHS) requirements.	Amended procurement procedure	One month prior to voyage commencing
PS 3: Pollution Prevention and Control				
3.1	Water Quality and Effluents	Provide a sponsor's joint assessment of the pipeline contractor/operator actions to manage any hydrostatic testing water discharged offshore in alignment with GIIP.	Memorandum detailing support or supplemental actions for the management of the hydrostatic water discharges	Prior to First Disbursement
3.2	Air Quality and Atmospheric Emissions	EDP Air Quality Monitoring Plan needs to be updated to clearly define monitoring requirements disaggregated for the FSRU – alternatively, a Project-specific Air Quality Monitoring Plan is required. Provide an updated Air Quality Monitoring Plan for the Operations Phase for the Project	Air Quality Monitoring Plan – Operations Phase – taking into account the FSRU submitted	30 days prior to the Project Physical Completion Date
3.3	Greenhouse Gas Emissions	Provide an Annual Greenhouse Gas Inventory for the Project	Annual GHG Inventory submitted	First Inventory due on December 31 <sup>st</sup> , 2021
PS 4: Community Health & Safety				
4.1	Community Health, Safety and Security	a. Conduct ongoing engagement with EDP regarding monitoring and reporting to external stakeholders about the implementation of the exclusion zone, as per EDP specific applicable community-related E&S plans (e.g. Livelihood Restoration Plan-LRP; Emergency Preparedness Response Plan-EPRP; Security Management Plan-SMP), as required by EDP deadline requirements.	a. Evidence submitted of engagement through regular (monthly) reports to EDP containing e.g.: i) minutes of meetings/attendance registers; ii) implementation of planned activities (e.g. drills); iii) incident reporting.	First progress report due 30 days after Project Physical Completion
4.2	Emergency Preparedness and Response	<ul style="list-style-type: none"> <li>a. Develop a Project-specific Emergency Preparedness and Response Plan (EPRP) for FSRU operation</li> <li>b. Disseminate the EPRP to the workforce and relevant external stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>a. EPRP submitted</li> <li>b. Evidence of EPRP dissemination provided</li> </ul>	a. and b.: 30 days prior to Project Physical Completion Date

4.3	Security Management and Personnel	<p>a. Develop Project-specific security management plan for the transportation phase once the Private Maritime Security Contractor (PMSC) has been appointed, detailing specific provisions including risk assessment and identification of high-risk areas to be used for transit, equipment to be used by the PMSC (including arms if considered necessary) as per the risk assessment, and types of training to be required for all security staff.</p> <p>b. Update security management plan for operations to clearly stipulate security provisions and roles and responsibilities for security provision at the FSRU.</p>	<p>a. Project-specific security management plan submitted</p> <p>b. Updated security management plan submitted</p>	<p>a. One month prior to voyage commencing</p> <p>b. 30 days prior to Project Physical Completion Date</p>
<b>PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>				
6.1	Baseline and Impact Assessment and Conservation of Biodiversity	<p>Potential Entrainment and Impingement:</p> <p>a. Undertake an assessment of the cooling and regasification water intake regarding the entrainment and impingement of fish larvae (and juveniles), as well as accidental spills of pollutants based on additional plankton baseline data.</p> <p>b. Include mitigation measures to the assessment to address the impacts, if identified,</p>	<p>a. Assessment report of the cooling and regasification water intake submitted</p> <p>b. Updated MBM submitted, if needed</p>	<p>a. Prior to Financial close</p> <p>b. 30 days prior to Project Physical Completion Date</p>