

# Offshore Cape Three Points Environmental and Social Monitoring Report 2023

Vitol Upstream Ghana Limited

June 2024



**OFFSHORE CAPE THREE  
POINTS  
ENVIRONMENTAL AND  
SOCIAL MONITORING  
REPORT (SEPTEMBER  
2023)**

# OFFSHORE CAPE THREE POINTS ENVIRONMENTAL AND SOCIAL MONITORING REPORT (SEPTEMBER 2023)

Project No. **1620010598**  
Issue No. **FINAL**  
Date **26 February 2024**  
Made by **C Halliwell, M Westbury and S Coey**  
Checked by **C Halliwell**  
Approved by **C Halliwell**

Made by: M Westbury, C Halliwell, and S Coey  
Checked/Approved by: C Halliwell



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## Version Control Log

Revision	Date	Made by	Checked by	Approved by	Description
1	10/11/23	MW, CH, SC	CH	CH	Draft issued to WBG/Vitol for comments (not for disclosure)
1	7/01/24	MW, CH, SC	CH	CH	Draft issued to Vitol, IFC and Eni following comments received from IFC and Eni (not for disclosure)
1	26/02/24	MW,CH,SC	CH	CH	Final – disclosure version

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PHOTOLOG

## ACRONYMS AND ABBREVIATIONS

ACA	Additional Conservation Actions
AIS	Alien Invasive Species
AMR	Annual Monitoring Report
AQS	Air Quality Standard
BAP	Biodiversity Action Plan
BMP	Biodiversity Management Plan
BWPD	Barrels of Water Per Day
CAW	Centre for African Wetlands
CEMS	Continuous Emissions Monitoring System
CIS	Community Investment Strategy
CLO	Community Liaison Officer
DAoI	Direct Area of Influence
EC	Energy Commission
EDGE	Economic Diversification for Ghanaians Living in Ellembelle
E&S	Environmental and Social
ePTW	Electronic Permit to Work
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESL	ESL Consulting
EHS	Environmental, Health and Safety
EPA	Environmental Protection Agency
ERP	Emergency Response Plan
FC	Fisheries Commission
FFI	Flora and Fauna International
FPSO	Floating Production Storage and Offloading
GBVH	Gender-based violence and harassment
GEA	Ghana Enterprise Agency
GES	Gas Export Sealine
GMA	Ghana Maritime Authority
GNGC	Ghana National Gas Company
GNPC	Ghana National Petroleum Corporation
GOR	Gas Oil Ratio
GUPC	Ghana Petroleum Upstream Chamber
HSE	Health, Safety and Environment
HSE and S	Health, Safety, Environment and Sustainability
IBA	Important Bird and Biodiversity Area
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
IOCs	International Oil Companies
kboe	Kilo barrels of oil equivalent
KPI	Key Performance Indicator
LDPj-CIS	Local Development Project-CIS
LRP	Livelihood Restoration Plan
LTI	Loss Time Incident
MIGA	Multilateral Investment Guarantee Agency
MMO	Marine Mammal Observer
MMscf	Million standards cubic feet
MoC	Management of Change
MoU	Memorandum of Understanding
MPG	Main Power Generator

MS	Management System
NAG	Non-associated Gas
NNL	No net loss
NNLIP	No Net Loss Implementation Plan
NO <sub>2</sub>	Nitrogen Dioxide
NO <sub>x</sub>	Oxides of nitrogen
O&G	Oil and Gas
OCTP	Offshore Cape Three Points
ORF	Onshore Receiving Facility
OHS	Occupational Health and Safety
PAP	Project-Affected Person
PAC	Permanent Accommodation Camp
PC	Petroleum Commission
PHC	Population and Housing Census
PM <sub>10</sub>	Particulate matter <10 microns in diameter
PP	Project Participants
PPE	Personal Protective Equipment
PS	Performance Standard
PTW	Permit to Work
QMR	Quarterly Monitoring Report
RoW	Right of Way
SEP	Stakeholder Engagement Plan
SHERPA	Safety Health Environment Radiological Protection Data Acquisition
SLC	Sustainability & Local Content
SMP	Security Management Plan
SO <sub>2</sub>	Sulphur Dioxide
STEM	Science, Technology, Engineering and Mathematics
tCO <sub>2</sub> eq	Tonnes of Carbon Dioxide equivalent
ToR	Terms of Reference
Vitol	Vitol Exploration and Production Limited
Voluntary Principles	Voluntary Principles on Security and Human Rights
VUGL	Vitol Upstream Ghana Limited
WB	World Bank
WBG	World Bank Group
WHO	World Health Organisation
WMP	Waste Management Plan

## EXECUTIVE SUMMARY

In September 2023, Ramboll UK Limited, acting in the role of Independent Environmental and Social Consultant (IESC), undertook the eighth in a series of 6-monthly/annual site visits to monitor the environmental and social (E&S) performance of the Offshore Cape Three Points (OCTP) Project, Republic of Ghana (the 'Project'). The Project is operated by Eni Ghana Exploration and Production Ltd (Eni Ghana). Vitol Upstream Ghana Limited (VUGL), an affiliate of Vitol Exploration and Production Limited (Vitol), and Ghana National Petroleum Corporation (GNPC) are JV non-operating partners.

The overall role of the IESC is to monitor the Project's management of E&S matters, including the implementation of the Project Environmental and Social Action Plan (ESAP); the adequacy of Health, Safety, Environment and Sustainability Management Systems; and the implementation of a suite of E&S management plans intended to address applicable Project standards, notably the World Bank Group (WBG) Performance Standards<sup>1</sup>.

A two-person team from Ramboll participated in the site visit. Representatives from IFC and VUGL also joined the site visit as observers. The Ramboll team was supported by a biodiversity specialist based in the UK who joined meetings remotely. Topic specific meetings were conducted with the Eni Ghana HSE and the Sustainability and Local Content (SLC) teams and their supporting consultants throughout the site visit (see site visit itinerary, Appendix 3). The primary objectives of the monitoring visit were to:

1. Confirm closure of the issues identified during previous visits/desk-top reviews;
2. Address any issues identified following review of the Project's 2022 Annual Monitoring Report and Quarterly Monitoring Report prepared at the time of the visit (Q1 and Q2 of 2023);
3. Conduct a physical walkover of the Onshore Receiving Facility (ORF) including the Gas Export Sealine (GES) shore crossing;
4. Interview Eni Ghana's environmental/biodiversity monitoring consultants;
5. Monitor the ongoing implementation of Eni Ghana's E&S management plans including biodiversity plans, such as its Turtle and Avian Biodiversity Action Plans (BAPs) with a particular focus on actions taken to achieve no net loss of habitat;
6. Revisit status of Security Management Plan and its implementation;
7. Discuss recent progress, status and future work with respect to:
  - a. The Livelihood Restoration Plan (LRP); and
  - b. The Local Development Project-Community Investment Strategy (LDPj-CIS) projects, including the Water and Sanitation, Education, Access to Energy and Economic Diversification ('Livelihood' and 'Building Business') components.
8. Discuss implementation of the Stakeholder Engagement Plan and the current situation regarding both community and workers' grievances;
9. Gather feedback on labour and working conditions through four group interviews with workers from contractors and Eni Ghana working at the ORF;
10. Discuss the ongoing influx monitoring;
11. Assess status of efforts to manage cumulative impacts;
12. Revisit compliance with the ESAP (version updated February 2018); and
13. Identify any upcoming activities for further attention in future monitoring efforts.

Regarding the first objective, the IESC found that Eni Ghana had made good progress with the closure of the actions reported following the previous IESC monitoring trips. The IESC found that the Project to be compliant with the requirements of the ESAP, and that HSE and social matters are well managed.

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<sup>1</sup> WBG Performance Standards refer to IFC (January 2012), WB (July 2012) and MIGA (October 2013) Performance Standards



Nevertheless, 22 findings were identified during the site visit. Of these, zero findings are of 'High' significance and 10 are of 'Moderate' significance with the remainder being of 'Minor' significance. Below, the findings of 'Moderate' significance are presented along with recommendations.

The findings categorised as 'moderate' are listed below.

1. Following a community request, Eni Ghana are planning the development of an upgraded feeder road (which is separate to the existing beach road) for the community of Bakanta and have started the procurement process for engineering studies. Eni Ghana have also decided to undertake an Environmental and Social Impact Assessment (ESIA) for the road. Eni Ghana should ensure some overlap in timing between the engineering and the ESIA studies so that the findings of the ESIA can be used as input to engineering decisions. Eni Ghana should also engage with the local communities to help ensure that the proposed route is acceptable to the community, whilst at the same time balancing the need to protect biodiversity, and that this engagement is also used to feed into the engineering studies and the ESIA.
2. Eni Ghana has managed to progress efforts in respect to management of cumulative impacts, however, disagreement over the funding mechanism remains a significant barrier to the functioning of the Multi Stakeholder Co-management Platform and technical working groups. Ongoing efforts are required to resolve disagreement over the funding mechanism and to transfer Secretariate duties. The IESC recognises the multi stakeholder nature of the platform and the limited influence Eni Ghana has as a single operator. Nevertheless, it should continue to use its best endeavours to resolve the issue highlighted above.
3. Safety risk assessment for SLC team - while the SLC team are provided PPE for field work, there has not been a comprehensive risk assessment for the tasks conducted by the SLC team while doing work in the communities. The IESC has recommended that Eni Ghana undertake a risk assessment exercise for the tasks conducted by the SLC team, using similar approaches as for the activities undertaken within the ORF.
4. A number of H&S observations were made during an inspection of the ORF, including: access to the plant nursery; risks posed by corroded fencing and barbed wire; pooling of water and poor H&S practices at the warehouse. Collectively these represent a moderate risk and actions should be taken to address each of the findings without delay.
5. Monitoring of the Main Power Generator stack emission indicate exceedance of applicable standards for carbon monoxide and nitrogen oxides. For the former, the origins of the limit and its applicability to the Project should be confirmed. For the latter, the benefits of the planned process improvements may bring the MPG emission back into compliance, however if this is not the case, further investigations into this apparent non-compliant emission will be required. Regardless of any benefit resulting from the process improvements, further details are required on the operating parameters of the MPG when taking emission measurements, particularly as NO<sub>x</sub> emission can increase when the MPGs are operating at reduced load, for example, <70% capacity. Knowledge of the operating parameters during future sampling periods will provide context to the results.
6. The Security Management Plan was reviewed and the following observations made:
  - the risk matrix in the latest version of the Security Management Plan makes reference to discussion regarding finalisation of a MoU with the Navy. Given that the MoU was agreed in 2022 this text would appear to be out of date.
  - the risk matrix does not appear to consider emerging events/threats, for example upcoming elections/protests. Such events should be considered and documented in the risk matrix.

- SMP updates, scheduled to occur annually (or more frequently in the event of a significant change) should be documented.
7. Review of LRP Completion Audit - the programme of support under the LRP has been completed and a consultant is preparing the LRP Completion Audit, due to be completed in October 2023. The LRP Completion Audit is a vital part of the delivery of the LRP, and should be carefully reviewed by Eni Ghana and IFC, with support from the IESC as applicable, before it is finalised and the LRP then be considered as completed. The Completion Audit should acknowledge the impact that economic challenges arising from COVID-19 and inflation will have had on livelihoods, and the livelihood status of vulnerable persons and the impact of vulnerability on livelihood restoration should also be clearly stated. Additionally, for those LRP PAPs who were also EDGE beneficiaries, the LRP Completion Audit should consider the contribution of the LRP in restoring their livelihoods, separate to the impact of EDGE support.
  8. The impacts on turtle nesting habitat associated with the upgrade of the Bakanta beach road is unknown. Further assessment is required to determine whether there has been additional loss of habitat due to the upgrade of the beach road and factor any losses into the No Net Loss Implementation Plan.
  9. The BAP target to keep sea turtle poaching at the baseline level or below (19%) was not met for the reporting period (22.7%, which is above the 20% warning threshold stated in the BAP and therefore requires a review of the drivers for this exceedance and options available for further intervention). Considering the overall high degree of poaching and the poor willingness of the local fishers to release turtles which destroy their nets, the IESC recommends exploring further opportunities to decrease the poaching and the provision of nets to compensate for the damaged ones as recommended by the End of the Season Report, recognising that such measures would need to be managed carefully to minimise the chance of the approach being abused by fishermen.
  10. The assessment of the light disturbance revealed an overall 60% increase in artificial light and a 120% increase in Rank-3 light (the most harmful type of light for turtles) in comparison with the 2016 baseline which is largely related to Eni Ghana's community school construction at Bakanta. This is overall significantly above the BAP warning threshold (25% increase). The Project should further work internally and with the community to find a solution to address the increased light disturbance issue. Noting this social project did not consider ecological harm caused by the lighting, a formal communication/liaison protocol should be implemented to ensure conflicting biodiversity and social issues are identified during the early planning stages of any future community development projects.

The findings presented in this report should be incorporated within Eni Ghana's audit findings and action tracking/closure process, with evidence of corrective actions provided via the Lenders' quarterly reporting process.

# 1. INTRODUCTION

Ramboll UK Limited (Ramboll) was commissioned in January 2017 by Vitol Upstream Ghana Limited (“VUGL” or “Vitol”) to undertake environmental and social monitoring (E&S) of the Offshore Cape Three Points (OCTP) Project (the ‘Project’), Republic of Ghana. The Project is operated by Eni Ghana Exploration and Production Ltd (Eni Ghana). VUGL, an affiliate of Vitol Exploration and Production Limited, and Ghana National Petroleum Corporation (GNPC) are JV non-operating partners.

In fulfilling the role of Lenders’ Independent Environmental and Social Consultant (IESC), Ramboll has a duty of care to a consortium of lenders (the ‘Lenders’) to the Project, including the International Finance Corporation<sup>2</sup> (IFC), World Bank<sup>3</sup> (International Development Association) and the Multilateral Investment Guarantee Agency<sup>4</sup> (MIGA) which are all members of the World Bank Group (WBG).

This report provides the findings following the seventh of a series of independent monitoring visits in which the Project is assessed against agreed E&S management plans which in turn were developed to meet the applicable Project Standards, including the WBG Performance Standards and applicable WBG Environmental, Health and Safety (EHS) guidelines.

A two-person team from Ramboll participated in the site visit. Representatives from IFC and VUGL also joined the site visit as observers. The in-country Ramboll team was supported by a biodiversity specialist based on the UK who joined meetings remotely. Topic specific meetings were conducted with the Eni Ghana HSE team, the Sustainability and Local Content (SLC) team and supporting consultants throughout the site visit (see site visit itinerary, Appendix 3). The primary objectives were to:

1. Confirm closure of the issues identified during previous visits/desk-top reviews;
2. Address any issues identified following review of the Project’s 2022 Annual Monitoring Report and Quarterly Monitoring Report prepared at the time of the visit (Q1 and Q2, 2023);
3. Conduct a physical walkover of the Onshore Receiving Facility (ORF) including the Gas Export Sealine (GES) shore crossing;
4. Interview Eni Ghana’s environmental/biodiversity monitoring consultants;
5. Monitor the ongoing implementation of Eni Ghana’s E&S management plans including biodiversity plans, such as its Turtle and Avian Biodiversity Action Plans (BAPs) with a focus on the No Net Loss Implementation Plan;
6. Confirm status of Security Management Plan and its implementation;
7. Discuss recent progress, status and future work with respect to:
  - a. The Livelihood Restoration Plan (LRP); and
  - b. The Local Development Project-Community Investment Strategy (LDPj-CIS) projects, including the Water and Sanitation, Education, Access to Energy and Economic Diversification ('Livelihood' and 'Building Business') components.
8. Discuss implementation of the Stakeholder Engagement Plan and the current situation regarding both community and workers’ grievances;
9. Gather feedback on labour and working conditions through four group interviews with workers from contractors and Eni Ghana working at the ORF;

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<sup>2</sup> Lender to VUGL debt financing package

<sup>3</sup> Guarantor to support the gas development

<sup>4</sup> Insurer for the lenders to VUGL, including Equator Principles Banks and Export Credit Agencies.

10. Discuss the ongoing influx monitoring;
11. Assess status of efforts to manage cumulative impacts;
12. Revisit compliance with the ESAP (version updated February 2018); and
13. Identify any upcoming activities for further attention in future monitoring effort.

Face-to-face/remote interviews were held primarily with Eni Ghana's:

- Health, Safety and Environment (HSE) Team;
- Sustainability and Local Content (SLC) Team;
- Security Manager; and
- Biodiversity experts from Eni HQ, Milan (remote)

Further face-to-face interviews/meetings were held with representatives of the following Eni Ghana consultants, including:

- ESL Consulting; and
- TechnoServe.
- Envaserv Research Consult

VUGL's Asset Manager was present during the site visit and available to answer any questions raised by the IESC. Also, representatives from the World Bank Group (IFC) joined the monitoring visit as observers. Eni Ghana and Vitol made available all personnel requested by the IESC and fully cooperated with all requests made by the IESC throughout the visit.

## 2. SCOPE AND STRUCTURE OF THE REPORT

### 2.1 Scope of the virtual site visit

As a condition of the Project ESAP (Appendix 1), Eni Ghana and VUGL are required to appoint an IESC to monitor and report on the implementation of the ESAP and compliance with WBG Performance Standards and Project E&S commitments.

This E&S Monitoring Report details the Project's compliance with the applicable Project Standards listed in Section 2.2, and in doing so, presents the HSE&S risks associated with the Project. It has been prepared for the attention of VUGL, the IFC and other entities defined as relying parties<sup>5</sup>. It addresses the various components of the Project (as defined briefly in Section 3, Project Description).

The report presents the findings of the September 2023 site visit based on information gained following: interviews with Eni Ghana personnel and consultants supporting with Eni Ghana's management of E&S issues and review of documentation made available prior to and during the site visit. A full list of Project documentation reviewed during preparation of this E&S Monitoring Report is provided in Appendix 2.

The site visit was undertaken during the period 25<sup>th</sup> September to 29<sup>th</sup> September 2023. The tasks performed are summarised below and detailed in the site visit itinerary (Appendix 3): Meetings and interviews, primarily concerned the management and monitoring of the following Project Health, Safety, Environment (HSE) and Sustainability and Local Content (SLC) aspects, were held:

- Project status, including new issues/activities;
  - HSE and SLC resourcing;
  - Audit and inspection programmes (HSE);
  - Permitting;
  - Environmental monitoring (onshore and offshore);
  - Biodiversity (monitoring and implementation of management plans such as the Biodiversity Action Plans and No Net Loss Strategy);
  - Discharge of produced water;
  - Greenhouse gas emissions monitoring and reporting;
  - Emergency response;
  - Status of oil sheens and remedial actions/plans;
  - Monitoring and evaluation work to determine livelihood restoration status;
  - Influx management;
  - Management of cumulative impacts;
  - Community Investment Strategy implementation (including status and progress for the projects);
  - Stakeholder engagement/Grievance Mechanism;
  - Occupational Health and Safety (OHS) performance and management;
  - Security management (offshore – FPSO, and onshore - ORF); and
  - Status of ESAP requirements.
- Open findings from site visits/desk top studies were also revisited and closed where possible.

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<sup>5</sup> Relying parties include Eni Ghana and the World Bank, MIGA, and other lenders.

## 2.2 Project Standards

In accordance with the IESC's Terms of Reference, the Project was assessed against the following standards and guidelines:

- Applicable laws and regulations of Ghana;
- WBG Performance Standards (2012):
  1. PS1: Assessment and Management of Environmental and Social Risks and Impacts;
  2. PS2: Labour and Working Conditions;
  3. PS3: Resource Efficiency and Pollution Prevention;
  4. PS4: Community Health, Safety, and Security;
  5. PS5: Land Acquisition and Involuntary Resettlement; and
  6. PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- WBG Environmental Health & Safety (EHS) Guidelines applicable to the Project including:
  1. EHS General Guidelines (2007);
  2. EHS Guidelines for Offshore Oil and Gas Development (2015); and
  3. EHS Guidelines for Onshore Oil and Gas Development (2007).

PS7 (Indigenous Peoples) was excluded from the scope of the independent monitoring on the basis that the E&S Due Diligence<sup>6</sup> performed prior to financial close concluded that no Indigenous Peoples are affected by the Project.

PS8 (Cultural Heritage) was excluded from the IESC's scope for this monitoring visit (although comments are made where potential impacts to cultural heritage objects are perceived).

## 2.3 Structure of the Report

Section 3 below describes the status of production activities at the time of the visit. Section 4 describes how different levels of significance are attributed to issues highlighted in the report, and Section 5 outlines the Ghanaian legislative framework, including status of key permits, and other applicable Project Standards. The report is then structured around the seven IFC Performance Standards that are applicable to the Project. The key issues identified during the monitoring visit are summarised in 'significance tables' for each Performance Standard. The status of residual open issues from previous monitoring reports is provided in Appendix 4; these are closed where possible based on discussion and findings made during the site visit.

The report has endeavoured to provide a balanced opinion, providing examples of good practice. However, being a compliance report covering a broad range of aspects, it does focus mostly on observations and non-compliances.

The IESC has not duplicated all information provided in previous reports. Thus, to obtain background information/context in relation to this report, it should be read in conjunction with previous IESC reports listed in the Table 2-1.

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<sup>6</sup> An environmental and social due diligence (ESDD) exercise was performed by KBC Process Technology Ltd on behalf of potential lenders [Ref - Environmental and Social Review OCTP Project, Ghana September 2016]. The ESDD Report identified a number of issues and made recommendations that were transposed into an Environmental and Social Action Plan (ESAP). The ESAP provided in the ESDD report formed the basis of the final agreed ESAP included in Appendix 1 of this report.

**Table 2-1: List of IESC monitoring reports**

<b>Report title</b>	<b>Site visit/desk-top review</b>	<b>Reporting period</b>	<b>Date of Issue</b>
Offshore Cape Three Points Environmental and Social Monitoring Report (status in September 2022)	Site visit	June 2021 to September 2022	February 2023
Offshore Cape Three Points Environmental and Social Monitoring Report (May 2021) – 2021 AMR, Q1 and Q2 2020 QMR	Desk-top virtual site visit (due to COVID)	July 2020 to May 2021	August 2021
Offshore Cape Three Points Environmental and Social Monitoring Report – 2019 AMR, Q1 2020 QMR and Q2 2020 QMR	Desk-top virtual site visit (due to COVID)	1 <sup>st</sup> July 2019 to 30 <sup>th</sup> June 2020	December 2020
Offshore Cape Three Points Environmental and Social Monitoring Report – Q2, 2019 QMR	Desk-top	1 <sup>st</sup> April to 30 <sup>th</sup> June 2019	November 2019
Offshore Cape Three Points Environmental and Social Monitoring Report (status in May 2019)	Site visit	19 May to 23 May 2019	July 2019
Offshore Cape Three Points Environmental and Social Monitoring – Q4, 2018 QMR	Desk-top	1 <sup>st</sup> October to 31 <sup>st</sup> December 2018	April 2109
Offshore Cape Three Points Environmental and Social Monitoring – Q3, 2018 QMR	Desk-top	July 2018 to September 2018	February 2019
Offshore Cape Three Points Environmental and Social Monitoring Report (status in September 2018)	Site visit	17 September to 21 September 2018	December 2018
Offshore Cape Three Points Environmental and Social Monitoring – Q1 and Q2, 2018 QMR	Desk-top	January 2018 to June 2018	October 2018
Offshore Cape Three Points Environmental and Social Monitoring Report (status in March 2018)	Site visit	16 September to 16 March 2018	July 2018
Offshore Cape Three Points Environmental and Social Monitoring – Q3, 2017 QMR	Desk-top	June 2017 to September 2017	December 2017
Offshore Cape Three Points Environmental and Social Monitoring Report (status in September 2017)	Site visit	21 February 2017to 15 September 2017	November 2017
Offshore Cape Three Points Environmental and Social Monitoring – Q1, 2017 QMR	Desk-top	January 2017 to March 2017	June 2017
Offshore Cape Three Points Environmental and Social Monitoring Report (status in February 2017)	Site Visit	Period up to 20 <sup>th</sup> February 2017	May 2017

## 2.4 Limitations

None.

### 3. PROJECT DESCRIPTION

This section is intended to provide a brief description of the Project and the status of construction/production activities at the time of the site visit. It also highlights any material design changes that might result in HSE and S impacts.

#### 3.1 Project description

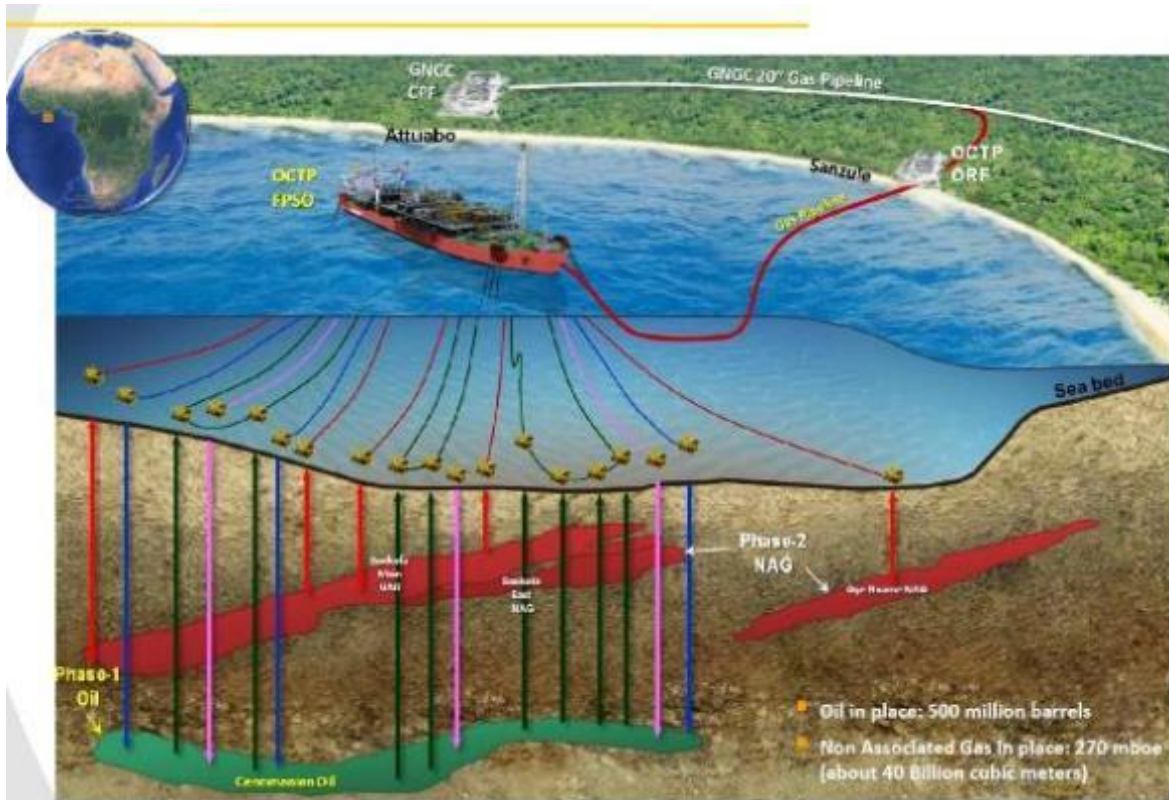
The Project, as described in the Phase 1 and Phase 2 ESIA Reports, involved the development of the Sankofa East oil field and non-associated gas in the Sankofa and Gye Nyame Gas Fields, which are located offshore, 55 to 60 km from the coastline of the Western Region of the Republic of Ghana (Figure 3-1). Eni Ghana has developed these fields as an integrated oil and gas development Project utilising a newly converted double-hulled FPSO facility. Other key components of the original Project include:

- Fourteen wells for oil exploitation (producing and injection wells); oil is transferred to tankers for direct export to market;
- Five wells for non-associated gas exploitation;
- A 63km subsea gas pipeline from the FPSO to shore;
- A 1.5 km onshore gas pipeline from the shore to the (ORF);
- The Onshore Receiving Facility (ORF) (Figure 3-2), including a gas compressor station, pilot and permanent accommodation camps, firefighting station, helipad and medical facility; and a tie-in to the existing Ghana National Gas Company (GNGC) 20-inch gas pipeline; and
- A logistics base in Takoradi and a quay within the port of Takoradi.

The Project is split into two phases:

- Phase 1: Oil Development Project. This phase consists of the 14 subsea wells (8 oil producers, 3 water injectors and 3 associated gas injectors), subsea facilities, and a FPSO unit that would be located approximately 60 km offshore south of Sanzule; and
- Phase 2: Gas Development Project. This phase will consist of 5 subsea wells, subsea facilities, gas treating facilities on the FPSO unit, a 63km subsea gas pipeline (known as the gas export sealine or GES), the ORF, and tie-in with the GNGC sales gas pipeline.





**Figure 3-1: Schematic of the OCTP Project (pre infill wells)**

Material Project design/scope changes since the ESIA Report was prepared included 3 infilling wells, the upgrade of regulating and metering stations with a short interconnecting pipeline in Takoradi associated with the West Africa Gas Pipeline and a revised approach to the nearshore pipeline installation/beach crossing. The changes and execution of associated works have been completed and are described in previous reports rather than be duplicated here.

Status of the Project at time of the monitoring visit

The Project is well into its Production phase with first oil achieved in Q2, 2017 and first gas in Q3, 2018. At the time of the September 2023 site visit:

- The FPSO had been in position and producing oil since mid-2017;
- Drilling and completion of the original 20 subsea wells accomplished (10 oil producing; 5 gas producing, 3 gas injection; 2 water injection);
- Construction of the ORF tie-in to the GNGC gas pipeline completed;
- The GES was installed with gas exported to the ORF since 4<sup>th</sup> August 2018; post lay trenching (to lower the GES at the beach landfall) was completed in November/December 2018;
- All three compressors were operational and gas was being supplied to the GNGC gas sales pipeline for onward distribution;
- Reinstatement of disturbed land progressing was had been ongoing for several years;
- Three infill wells had been completed;
- The upgrade of regulating and metering stations was completed and handed over to the respective operators; and
- The Permanent Accommodation Camp (PAC) was occupied (since Q3, 2019).



**Figure 3-2: Onshore facilities (drone photo in late 2019)**

In its previous monitoring report the IESC identified a number of activities that were planned for 2022/23. These activities and their current status are shown in the table below.

<b>Planned Activity previously reported</b>	<b>Status (Sept 2023)</b>
Conversion of a gas injection well (GI-3) to an oil producer, anticipated to occur in Q3, 2021	Conversion to oil producer remains on hold. No drilling in the OCTP concession as of September 2023
Load Bank installation on ORF MPGs for generators output optimization <sup>7</sup> .	Construction was largely complete (and visited during the site visit).
Non-associated gas (NAG) system debottlenecking to boost the NAG system capacity to 260MMScfd	Successfully completed in early 2023
3rd HP Flash Compression System – installation of 3rd compression train to boost gas injection on FPSO <sup>8</sup>	Planned installation in Q1, 2027

Other Projects noteworthy Project developments, discussed in detail later in this report, include:

- The onset of small volumes of produced water since November 2022 from oil producing wells.
- Efforts to halt the leakage of oil from producer wells and thereby prevent occurrence of oil sheens.

<sup>7</sup> Installation of Power and Battery Banks for the parallel running of two MPGs to allow one MPG to take up the load in the event of a trip and to increase plant uptime and reliability.

<sup>8</sup> 3rd HP Compressor to ensure higher gas processing capacity (AG export to ORF) beyond the original HP compressor rate, thereby reducing volume of gas to be flared.

## 4. SIGNIFICANCE ASSESSMENT

### 4.1 Review Findings

A summary of the review findings is presented in a significance table at the end of each section (see Table 4-1 for an example of the summary table format). For each item, the following is presented:

- The aspect;
- A description of the issue, for example deficiencies or omissions;
- Identification of the standard(s) against which the deficiency or omission has been identified;
- The IESC's recommendation, where applicable, to resolve/manage the deficiency or omission; and
- The significance of the issue on a three-point scale (see below for criteria).

### 4.2 Assessment of Significance

A ranking system has been used to indicate the relative significance of an issue identified during the monitoring visit. As well as highlighting the most important areas requiring attention, it can also be used to aid the tracking and rectification of specific items requiring improvement.

Identified issues have been placed into one of the following four categories:

<b>Minor:</b>	Minor non-compliance, risk or minor technical breach of Applicable Standards and commitments with no material, actual or likely potential: environmental or social consequences; or significant human injury or harm.
<b>Moderate:</b>	Moderate non-compliance or risk with actual or likely potential: localised and short-term environmental or social consequences; minor human injury or harm; or material short-term breach of Applicable Standards and commitments.
<b>High:</b>	Major non-compliance or risk with actual or likely potential: spatially extensive and/or long-term environmental or social consequences; serious human injury/death or harm; or material and extensive breach of Applicable Standards and commitments.
<b>Not Applicable</b>	Issue is noteworthy, but it is not a matter of non-compliance.

Where time-critical recommendations are made (for example, for specific actions), a timeframe linked to Construction/Production phase milestones is indicated in the IESC Recommendations' column. Time-critical issues can lead to a higher classification of significance. Similarly, findings made in earlier reports that have not been addressed may be given an elevated significance categorisation in this report. Where possible an indicative date for completion is provided in parentheses under the Significance rating.

Table 4-1: Example of the summary table format

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
00	Storm water run-off – monitoring	<p>The ESAP requires <i>Company X</i> monitors the quality of surface water run-off from facilities.</p> <p>To date the Company has been unable to procure monitoring equipment – no monitoring has been undertaken.</p>	WBG EHS Guidelines	<i>Company X shall expedite procurement of monitoring equipment with the support of senior management.</i>	<b>Moderate</b> (within 3 months of issue of this report)

## 5. LEGISLATIVE FRAMEWORK AND OTHER PROJECT STANDARDS

### 5.1 Summary of legislative framework

The undertaking of projects such as oil and gas developments requires registration and authorisation by the Ghana Environmental Protection Agency (EPA). The EPA was established under the Environmental Protection Agency Act (Act No. 490 of 1994) as the leading public body responsible for the protection and improvement of the environment in Ghana. The EPA has the authority to require an EIA Report and is responsible for issuing and enforcing requirements specified in environmental permits. Permits are also required from other regulatory bodies including the Petroleum Commission (PC), Energy Commission (EC) and, for projects with coastal/offshore facilities and/or activities, the Ghana Maritime Authority (GMA).

### 5.2 Permitting

The status of the Project's permits has been discussed in preceding IESC monitoring reports. Following the gradual transition from the Construction to the Production Phase the nature of the Permits has changed, with only a limited number of Production Phase permits required. Key permits, falling under the responsibility of the HSE team, and their validity status at the time of the site visit are presented in the table below:

**Table 5-1. Status of key permits**

Issuing authority	Permit details	Validity (renewal/expiry date)
Ghana Environmental Protection Agency (EPA)	OCTP Block Phase 1_Oil Production Operations Permit	Renewed 15 May 2023 Expires 14 May 2026
Ghana Environmental Protection Agency (EPA)	OCTP Block Phase 2_ Gas Production Operations Permit	Renewed 21 Dec. 2022 Expires 20 Dec. 2025
Ghana Maritime Authority (GMA)	Permit to Operate FPSO and Subsea Facilities in Ghana waters. - Operating permit	Renewed 11 Apr. 2023 Expires 10 Oct. 2023
Ghana Maritime Authority (GMA)	Permit to Operate FPSO and Subsea Facilities in Ghana waters. - Safety permit	Renewed 01 June 2023 Expires 31 May 2024
Ghana Maritime Authority (GMA)	Establishment of exclusion safety zones around field and vessels	Renewed 15 Nov. 2022 Expires 14 Nov 2023
Petroleum Commission (PC)	Production Permit (oil and gas phase)	Renewal process stalled - Eni Ghana application was submitted on time

The Project has all the key permits with the exception of the production permit from the Petroleum Commission. Eni Ghana's position, as reported previously, remains unchanged: Eni Ghana disputed the request from the Petroleum Commission for production fees on the basis that the Regulation triggering production payments is pre-dated by 2006 Petroleum Agreement which includes "stabilisation provisions" guaranteeing the terms of the Petroleum Agreement. Thus, the imposition of fees would be contrary to the 2006 Petroleum Agreement agreed between parties including the Petroleum Commission and Eni Ghana. The IESC understands that Eni Ghana has stated its position in a letter addressed to the Petroleum Commission in March 2020 and has not received a formal response to the letter.

Other permits of lower materiality are also required. The IESC has reviewed Eni Ghana's permit register and the permits therein and finds them to be in place with the exception of the aforementioned permit from the Petroleum Commission and permits relating to security clearance for vessels. In the case of the latter, application have been made to the Petroleum Commission (June 2023) but no permits have been forthcoming to date.

## 6. PERFORMANCE STANDARD 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

### 6.1 Requirements specified in the ESAP

All actions with defined end dates<sup>9</sup> have been completed with the following exceptions:

- *ESAP 10. LRP Finalization report and Completion Implementation audit carried out by an external competent resettlement professional and report submitted to WBG*

See Annex 1 and Section 10.1 for more details on this ESAP item.

### 6.2 HSE and SLC responsibilities and resources

Organigrammes for the Safety Environment and Quality (SEQ) and SLC team were presented during the site visit. There are no significant changes to the structure and level of resourcing since the previous IESC Monitoring report and therefore the organigrammes have not been duplicated in this report. Levels of resource and competency within the SEQ and SLC functions remains good with no additional needs identified by the IESC.

The IESC did previously report the appointment of an HSE Operations Manager who would report to the HSEQ Manager. However, contrary to our earlier understanding, the review of the latest organogram indicates the post to be vacant. Other less senior posts also remain vacant.

Eni Ghana continues to receive specialist support on biodiversity matters from ESL10, Eni HQ in Milan and Flora and Fauna International<sup>11</sup> (FFI).

### 6.3 Audit programme

Eni Ghana prepares a HSE audit programme annually, detailing the programme for the upcoming 12 months (2023) and providing a high-level programme for the three years thereafter (2024-2026).

Ten key internal/external audits were planned for 2023, including the Ramboll audit (as the Lenders IESC). Similarly to the previous year, audits were targeted at:

- ISO 14001 and 45001 compliance (external audit by RINA);
- Contractors HSE compliance;
- Process safety; and
- Legal compliance

However, additional audits were including in the programme relating to internal and audit of Eni Ghana's Energy Management System (see also Section 6.3.2, ISO certifications and Section 8.4.2 – 8.4.3, GHG emissions).

The completion audit for the Livelihood Restoration Plan is discussed in Section **Error!**  
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Contractor Management

<sup>9</sup> Some ESAP items require ongoing action and therefore cannot be marked as 'completed'

<sup>10</sup> ESL is a specialist environmental consultancy based in Ghana

<sup>11</sup> FFI is a specialist biodiversity consultancy based in the UK.



Contractor management has been reported by the IESC within earlier site visit reports, particularly during the time of construction when the contractors' workforce peaked. Contractor management was revisited during the most recent site visit.

The Contractor Management HSE Procedure clearly specifies HSE expectations placed on Contractors and describes the process in place that is intended to ensure Contractors HSE performance. The Procedure scope covers, *inter alia*: pre-qualification; tendering; pre-mobilisation; works execution; demobilisation; and close out (8 phases in total).

The procedure was updated in February 2023 to include requirements placed on contractors in relation to energy management, in line with the Project's desire to achieve ISO 50001 certification. Accordingly, measures for energy efficient and reporting of energy consumption are included throughout the procedure. The procedure is comprehensive and well written insofar as requirements relating the development of HSE plans, emergency response, training, supervision and reporting are specified. Annex E includes minimum HSE requirement for contracts, as adjusted depending on the nature of the contractor's role. Expectations for contractors' subcontractors are also addressed within the scope of the procedure.

Eni Ghana has the right to audit any contractor and has a programme in place to do so. Three audit reports from 2023 were requested by the IESC, including audits of both waste contractors and a shipping Company (Macro Shipping). Typically, a team of around 4 auditors from Eni Ghana will conduct a one-day audit.

Audit reports were reviewed and found to be appropriate with many observations and recommendations made for the auditee's attention. Review of the Consolidated Action Tracking Register confirmed that audit actions are tracked and generally closed out in a timely manner with the exception of actions following an internal energy audit performed in September 2023 which, based on the consolidated tracker, has no target 'close out' dates.

#### 6.3.1 ISO Recertification Audit

Certificates for ISO 14001 (environment) and ISO 45001 (Occupational Health and Safety) were both renewed on mid December 2022 following an external audit by RINA. Both have a three-year validity expiring in December 2025.

Eni Ghana is also aiming for ISO 50001 and is currently awaiting to outcome of an ISO 50001 certification audit performed by RINA.

## 6.4 Local Development Project - Community Investment Strategy

Since late 2019, Eni Ghana refers to the Community Investment Strategy (CIS) as the Local Development Project-CIS (LDPj-CIS). Its fundamental aim is to promote inclusive economic growth and well-being for 10 coastal communities in the Ellembelle District (which includes the four communities in the Direct Area of Influence, DAoI) over the period 2019 to 2022. The original duration (2019 to 2021) was extended by one year primarily due to delays in completing the CIS Implementation Plan which resulted in postponement of certain planned actions in 2019. There are four main components of the LDPj-CIS:

- Water and Sanitation;
- Education;
- Access to Energy; and
- Economic Diversification ('Livelihood' and 'Building Business' initiatives).

The status of these components and the key actions undertaken during the reporting period are summarised in the sections below.



#### 6.4.1 Water Supply Project

In 2020, a decision was made to extend the Water Supply Project to bring water closer to more potential customers and thus generate additional revenue. This included the construction of three new fetching points (one in Anwolakrom and two in Sanzule) making a total of six fetching points, and refurbishment at the Water Treatment Facility with the installation of a water tank. The extended project has made potable water more easily available to approximately 5,000 residents of Sanzule (including Anwolakrom), Krisan and Bakanta. During 2021, Eni Ghana conducted engagement with the Water Board Committee<sup>12</sup> to support the handover of the Water Supply Project to the Committee. A Handover Certificate was signed in June 2021 between the contractors (Stepp Pryme Engineering Ltd or SPEL) and the Water Board Committee.

During the site visit, IESC went to the treatment plant location and spoke with a representative of the Water Board Committee and the operator. The IESC understands that the Water Board Committee continues to conduct water quality monitoring twice per year, and the feedback is that the Committee is satisfied that results indicate that the water is potable<sup>13</sup>. The facility that is being built next to the treatment plant to allow for the filling of water sachets that can then be sold is close to completion, and the Water Board Committee hope that this will lead to additional revenue.

The IESC notes that the Water Supply Project continues to operate under the Water Board Committee and has no recommendations for corrective actions.

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<sup>12</sup> A community-based committee that was established to manage the Project's delivery of water on an ongoing basis.

<sup>13</sup> As any testing is conducted by the Water Board Committee rather than Eni Ghana, IESC has not reviewed water quality testing data.



**Figure 6-1: Community Water System treatment plant, with adjacent facility in construction to allow for filling of water sachets**

#### 6.4.2 Education project

##### *Introduction*

The education project consists of two components:

- Capacity-building for school staff (the 'soft' component); and
- Improvements to schools and related infrastructure.

The project covered four basic schools (Sanzule/Krisan, Eikwe and Bakanta) and 400 students for the pilot phase and eight basic schools in all 10 communities for the main LDPj-CIS phase, with the aim to reach over 3000 students and over 100 teachers. Progress under these two components is considered below.

##### *Capacity-building Component*

The 'soft', capacity building component of the education project includes provision of teacher training in competency-based approach, human rights approach, organic agriculture, sports and COVID-19 prevention methods for all 10 communities in Eni Ghana's Area of Influence. The training is provided to existing teachers<sup>14</sup> and is designed to enhance their competency. The Italian NGO, Volontariato Internazionale per lo Sviluppo (VIS), has been contracted by Eni Ghana to continue to provide this capacity-building support for education. The timeline for completion of

<sup>14</sup> All of the teachers required for the schools are from the existing schools, and so the Project has provided training to existing teachers in the local schools rather than seeking to increase the number of teachers.

this component was extended from December 2022 to December 2023, under a Management of Change process. This was to allow additional time for the launch, implementation and distribution of scholarship packages to beneficiaries at the Charlotte Dolphyne Technical Institute, which has been included as part of this 'soft' component of the education project.

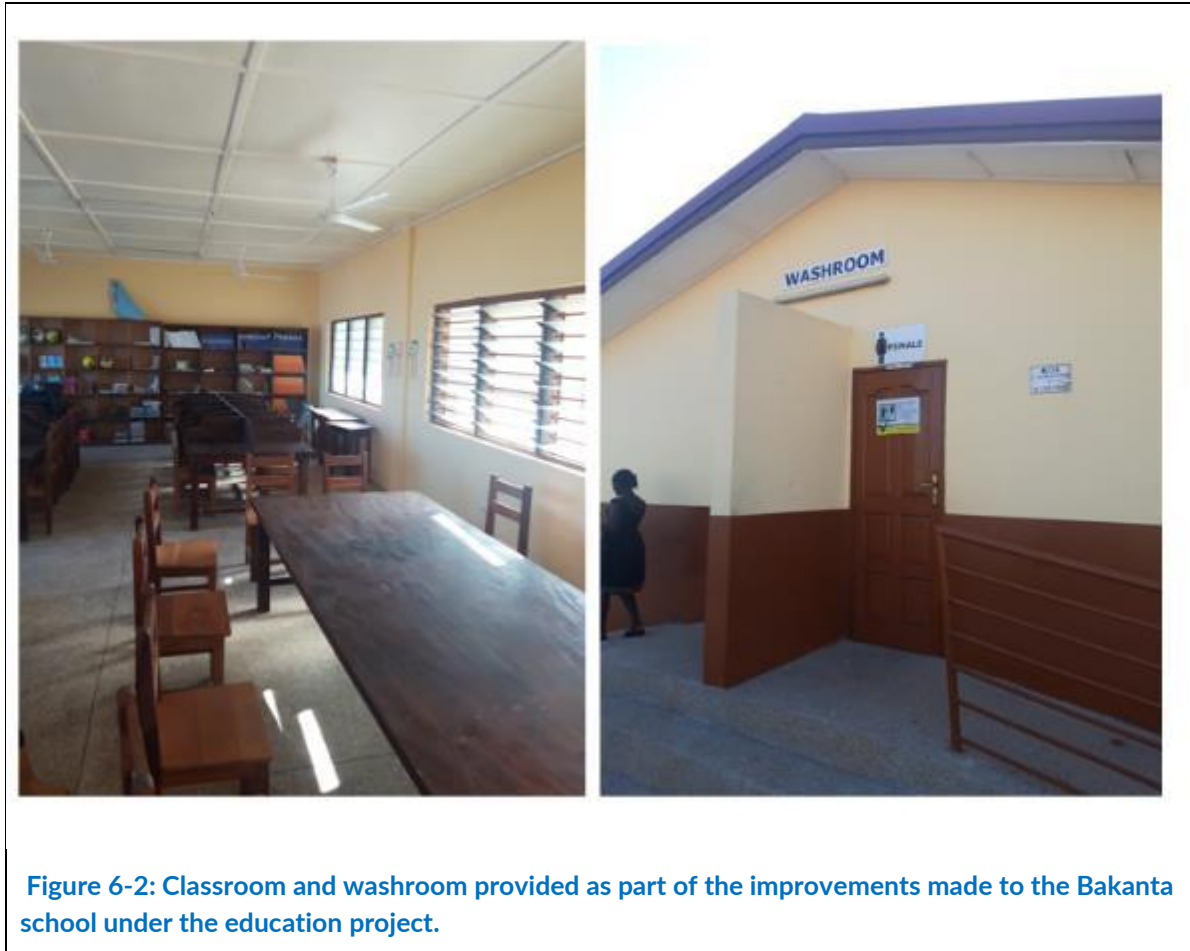
Within the monitoring period, the education project has included training of teachers on human rights issues, including measures to avoid use of corporal punishment, and measures to increase the participation of girls in the schools through the distribution of reusable sanitary pads and sensitization of menstrual health for all students, teachers, parents and School Management Committee. The soft component is still ongoing with further training and provision of the scholarship scheme, with completion due at the end of the 2023. VIS will then issue a closure report early in 2024, to cover the soft component of the education project.

#### *Infrastructure Component*

The infrastructure component of the education project involves the refurbishment of existing school buildings, the installation of solar panels, the construction of new facilities (staff rooms, libraries, canteens, toilet facilities, and sports facilities), and the supply of school furniture and sports equipment. Works have been undertaken at the following schools: Asemnda primary, Ngalekyi/Baku primary and Junior High School (JHS), Atuabo primary and JHS, Anokyi primary, Anokyi JHS, Eikwe primary, Eikwe JHS, Sanzule-Krisan primary, Sanzule - Krisan JHS, Old Bakanta primary, and New Bakanta primary and JHS. Works have been undertaken by Stepp Pryme Engineering Ltd. and MacWest Limited. All schools have now been completed and handover over, with the defect liability period ongoing.

#### *Findings*

During the site visit, the IESC visited the school in Bakanta and spoke with the headteacher, a teacher, and community members about the support that had been provided by the Project through the soft and infrastructure components. The feedback was highly positive, with a high level of appreciation for the significant physical improvement made to the school as well as the provision of training and materials (textbooks, etc). The IESC also discussed the education programme with the SLC team and reviewed documents provided in the AMR and QMRs. The IESC has found that Eni's approach to the education component has been holistic through its support to infrastructure, teacher training, awareness of human rights, and measures to support the participation of girls, and aims to be self-sustaining once the education project has completed. The IESC understands that the ongoing management and funding for the schools will be through the District Assemblies, and notes the challenges that may arise to ensure adequate maintenance of the facilities on an ongoing basis. This may be a particular issue for the schools that are close to the coast as the atmospheric conditions contribute to rust and wind damage over time. The IESC understands that as part of their ongoing monitoring and evaluation efforts, the SLC team will continue to engage with District Assemblies, school committees and other school representatives on any issues associated with the schools. Eni Ghana intend to provide further support where there is a clear need and they are able to do so, though this will be outside of a formal support programme, and with no obligation to provide such financial or other ongoing support.



**Figure 6-2: Classroom and washroom provided as part of the improvements made to the Bakanta school under the education project.**

#### 6.4.3 Access to Energy: Rural Clean Cooking Project

This project is a joint multi-phase project with the World Bank and is implemented by Ghana Alliance for Clean Cookstoves and Fuels (GHACCO). The expected benefits of the project are:

- Improved indoor and outdoor air quality with community health benefits;
- Reduced fuelwood use; and
- Quicker cooking times.

The project has now been completed and deployed a total of 3,373 units of improved biomass cookstoves and LPG cooking systems, between December 2021 and November 2022. It has therefore achieved its target objective of distributing 3,000 unit of improved cookstoves to households in the 10 beneficiary communities. The project also supported six local artisans (five males and a female) with technical training on charcoal and LPG cookstoves' design and manufacture. A final report has been prepared by GHACCO to summarise the activities undertaken and outcomes achieved. The IESC has no recommendations for corrective actions in relation to the rural clean cooking project.

#### 6.4.4 Economic Diversification: Building Businesses

The aim of this initiative was to encourage and support residents in the 10 communities in the establishment of small businesses. The project aimed for participation of 800 individuals, with an emphasis on women and youth. The main support was in the form of a variety of capacity-building activities, with material support provided as necessary on a case-by-case basis. The implementing partner was NBSSI/GEA and a kick-off meeting was held in February 2021, followed by an introduction of NBSSI/GEA to the communities during the period 15 to 17 April

2021 and to the Paramountcy in May 2021. In February 2022, the project completed the Entrepreneurship and Small Business Management training with 947 individuals in attendance from the 10 communities. A needs assessment for the technical skills training was also completed in the first quarter of 2022. Within the second quarter of 2022, compliance and regulatory training was conducted for registered participants.

Since September 2022, activities under the Building Businesses project has included:

- Advanced technical skills training was conducted for 406 participants in soap making, animal farming, hairdressing, dressmaking and event décor;
- Group trainings in cosmetology, carpentry, and beads making for 57 participants;
- A five day basic electrical skill training was conducted for 23 participants;
- Training on branding and packaging for a total of 129 participants; and
- An 8-days intensive training on Argon welding for 13 participants.

The Building Businesses project has now been completed, with a graduation ceremony for the project beneficiaries having been conducted on 26th April 2023. Over 1,000 attendees participated, and graduation certificates were presented to 765 beneficiaries who successfully participated and completed the various training programs under the project. The IESC has no recommendations for corrective actions in relation to the Building Businesses project.

#### 6.4.5 Economic Diversification: Livelihoods

Eni Ghana and TechnoServe Ghana established a Cooperation Agreement in February 2022 to deliver the 'Livelihoods' component of the Economic Diversification part of LDPj-CIS through a project referred to as 'Economic Diversification for Ghanaians Living in Embelle', or EDGE. The project aims to improve household food security and economic opportunities by adopting a value chain approach through improved agricultural production and livestock rearing. It seeks to create benefits to the communities within the Project's Area of Influence defined for the LDPj-CIS, specifically Atuabo, Bakanta (Old and New), Ngalekyi, Sanzule (including Anwolakrom), Krisan, Eikwe, Anokyi, Ngalekpole, Asemnda, and Baku. The project has a target of 600 beneficiaries (based on 300 households and 300 market-oriented producers) in these communities.

The EDGE project started in February 2022, with a series of engagement activities undertaken in March 2022 with community leaders, youth representatives and assembly members from the 10 communities. The engagements were used to introduce TechnoServe as the implementing partner, and to give details on what the EDGE project entails. A further round of community engagement was conducted in May 2022.

Since September 2022, the EDGE project activities have included provision of technical training, financial management training, pest identification and control training, agrochemical and fertilizer application training, support to the formation of cooperatives/associations for crop farmers, site inspections, provision of equipment (e.g. tools, polytanks, irrigation systems etc), provision of feed for livestock, and provision of livestock as starter packs (chicks, breeding pigs, juvenile fish). The EDGE programme has involved two cohorts of Project Participants (PPs), with the technical assessment for the second cohort of 173 PPs having been undertaken in March 2023 to assess the suitability of their lands for inclusion in the programme. In total, 563 PPs have been selected for the EDGE project, of which 428 are for crops and 135 for livestock.

As part of the site visit, the IESC visited a number of EDGE project beneficiaries, including those involved in crop farming, poultry, pig production, and aquaculture, and spoke with the beneficiaries about their experience of the EDGE project<sup>15</sup>. All of the beneficiaries met with spoke positively about the contribution from the EDGE project, and none stated the need for additional

<sup>15</sup> The selection of beneficiaries was provided by Eni Ghana / TechnoServe and may not be a representative sample of all beneficiaries.



or ongoing support from Eni, indicating at least some level of commercial sustainability to the activities. Some of the beneficiaries also spoke of re-investment of harvest revenues back into the activity, which is also a positive indicator of longer-term commercial sustainability.

The Eni Ghana and TechnoServe teams explained that flooding affected a number of beneficiaries from June 2023, and that the EDGE project has undertaken work to assess the extent of the flooding for those beneficiaries. In total, 388 beneficiary farms were affected, comprised 327 crops and 61 livestock farms. The EDGE project provided additional targeted support where necessary (e.g. additional seeds) for those affected by floods, but the project has avoided a level of intervention or additional support that could create ongoing dependencies on EDGE/Eni Ghana, or an expectation that EDGE/Eni Ghana will always step in to remedy any hardship or challenge. The IESC notes that this is a sensible approach to help beneficiaries become self-sustaining, rather than encouraging ongoing dependencies.

The EDGE project is current ongoing with the TechnoServe team monitoring progress made by the beneficiaries in their activities, providing support to the formation of cooperatives/associations for crop farmers, and completing other elements of the support programmes. The TechnoServe and Eni Ghana team are currently determining whether it is possible to close the EDGE project by the end of 2023 as was planned, with consideration to the impacts of the floods. The current plan is that a close out report will be developed by TechnoServe early in 2024, with this report stating the activities and outcomes of the programme.

#### 6.4.6 End of project evaluation

With the LDPj-CIS projects coming to an end, the IESC understands that Eni Ghana will undertake an evaluation and review of the programme in the 1st and 2nd quarter of 2024, and then consider options and develop a plan for a follow-on multi-year programme. They are also planning some targeted 'quick-win' LDPj-CIS activities in 2024. The IESC supports the approach to conducting a thorough review before considering the community needs and options to help address them, and then to develop a plan for the next programme of support.

### 6.5 Cumulative impacts

The ESAP includes a commitment for Eni Ghana to report on its "*best efforts to engage other developers, local institutions and government, and other stakeholders in designing coherent management strategies to mitigate cumulative impacts.*"

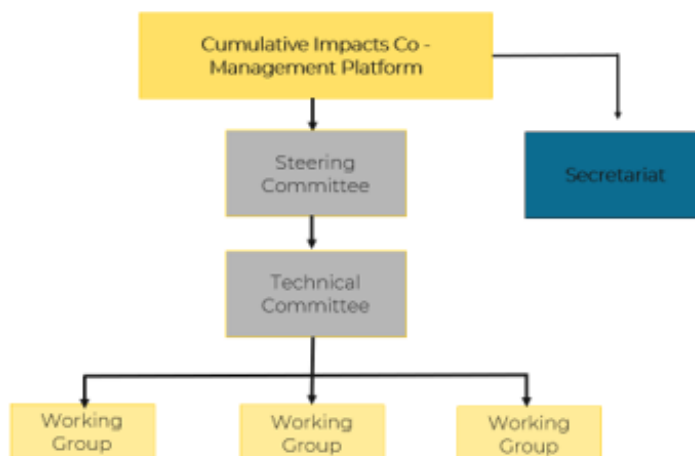
Previous IESC monitoring reports have presented Eni Ghana's progress in this regard through to September 2022. In summary the previous report confirmed, *inter alia*:

- a multi stakeholder co-management platform to manage cumulative impacts had been established;
- successful inauguration of a Technical Committee in (February 2022) to steer technical Working Groups; and
- preparation of a Terms of Reference with priority actions relating to fishing livelihoods and fishing regulations.

The IESC also previously highlighted key disagreements within the platform including: i) disagreement over the entities that should be party to the platform; and ii) funding of the platform/measures identified by Working Groups. A number of recommendations were made in light of the progress made in September 2022 which are listed below along with status updates.

Previous issue/recommendation	Status 2023
Disagreement over the entities which should be party to the co-management platform	Resolved – agreement reached on members of the platform
Funding of the platform	Unresolved
The IESC recommended Eni Ghana to influence the Technical Committee/Working Groups ToRs to include the actions highlighted in the biodiversity management plans, specifically: i) cumulative pressures on sea turtles; ii) cumulative impacts on birds; and iii) inclusion of population change as a topic for assessment.	i) In progress ii) In progress A ToR has been drafted by Envaserve (under contract to Eni Ghana) that addresses cumulative impacts on turtles and birds. ToR to be shared with the Co Management platform at the next meeting (see below). iii) Pending future Platform meetings Eni Ghana intends to raise the subject at future Co-Management platform meetings (see below).

The governance structure of the cumulative impact co management platform is shown in Figure 6-3. Membership of the Steering Committee include Ghana regulatory authorities, GNPC, GNGC and international oil companies (IOCs). Membership of the Technical Committee is the same but with the inclusion of Ghana Maritime Authority (GMA), the Fisheries Commission (FC) and Ghana Petroleum Upstream Chamber (GUPC).



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**Figure 6-3: Governances structure of cumulative impacts platform**

The IESC recognises the multi stakeholder nature of the platform and management of cumulative impacts in general, and the limited level of influence Eni Ghana has over the Platform direction as a single member of the platform (Steering and Technical Committees). Within the context of these constraints, the IESC acknowledges the significant efforts made by Eni Ghana, particularly in terms of its efforts to set up a biodiversity focussed Working Groups(s) in line with its biodiversity management plans. However, whereas progress has also been made with respect to the platform's members, Working Group(s) cannot function because of the failure to agree on the funding mechanism. The most recently scheduled meeting of the Steering Committee was postponed due to lack of availability amongst heads of the IOCs and efforts made by Eni Ghana to reconvene the meeting has to date not been successful<sup>16</sup>.

Eni Ghana also informed that it proposes the Secretariate duties be transferred from the Petroleum Commission to Ghana Petroleum Upstream Chamber in order to address some of the administrative challenges being faced. Such a transfer of duties will require agreement within the Platform with progress again being dependent on the occurrence of future meetings.

In summary, Eni Ghana has clearly endeavoured to address the IESC's earlier recommendations and to progress the management of cumulative impacts via the Co-Management Platform, however it faces constraints as a single operator/member of the Steering and Technical Committees. Progress towards agreement on the funding mechanism, and other issues highlighted in this section of the report, will be revisited in subject monitoring visits. In the interim, Eni Ghana should continue with its best endeavours to encourage future meetings and influence the direction of the Co-Management Platform/Workings Groups.

## 6.6 Influx in the DAoI

The Project conducted influx monitoring in the closest communities to the ORF (Sanzule and Anwolakrom, Krisan, Bakanta, and Eikwe), and has now completed the following household surveys subsequent to the 2016 baseline:

- First Household Survey in February 2019.
- Second Household Survey in April to May 2021
- Third Household Survey in April 2022.

In the last IESC monitoring report, the IESC noted that there remained no conclusive evidence of influx created by the Project, and as the Project has now moved well into the production phase the employment and economic opportunities afforded by the Project/construction workforce have significantly reduced, thus making influx less likely compared to the situation in 2019. The IESC recommended that as part of the next monitoring report, that Eni Ghana include data to reflect population trends in the broader region, i.e. in areas with no impact from the Project. This will help to show if the modest changes in population levels in DAoI communities are similar or different to broader population trends. The IESC also recommended that feedback be elicited from local community representatives to verify that the community do not consider influx as an ongoing issue that needs to be monitored.

The Eni Ghana team have responded positively to the two IESC recommendations as stated above, and have compiled published data on population change in the broader area as well as held community focus groups with opinion leaders of the four communities in Eni Ghana's DAoI to gather feedback on the perspectives on influx.

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<sup>16</sup> IESC has seen email evidence of Eni Ghana's effort to reconvene the meeting.



The published data shows that for other communities within Embelle District the level of population change from 2010 to 2021 may be higher than in the DAoI. The IESC has recommended that the final influx monitoring report also includes data for surrounding Districts as well as Ghana as a whole as that will help further confirm that the levels of influx in the DAoI are not notably higher than for other areas.

The key findings from the focus groups were that although the Project is seen as a contributing factor to community population increase, there are also other contributing factors, including from employment opportunities in hospitals, other oil and gas companies, hotels, restaurants, fishing activities and schools. Participants noted that as a result of population increase the communities were experiencing increased demand and pressure on toilet facilities, water, electricity, housing and cemetery space.

The IESC recommends that a monitoring report is prepared by Eni Ghana to reflect the published data and to report on the findings of the focus groups, and to then give a recommendation on the need for further influx monitoring. Based on the information provided during the site visit and in the previous influx monitoring reports, the IESC would support a recommendation that the influx monitoring can be closed, though this is conditional on the IESC reviewing the actual content and recommendation to be given in the monitoring report. The IESC does, however, recommend that demographic change and associated impacts on communities are included as a topic within the cumulative impacts co-management platform, as and when that is developed (see Section 6.5).

## **6.7 Stakeholder engagement**

The OCTP Operations SEP was finalized in June 2019 and is still being implemented. The Project updates the engagement action plan each year for the year ahead, based on the principles and approaches defined in the SEP. The 2022 AMR and the QMRs provide embedded copies of documents pertaining to stakeholder engagement events within their respective time periods. These documents and other information provided by Eni Ghana demonstrate that there continues to be a meaningful level of ongoing engagement with stakeholders on key topics, and that feedback is being elicited and recorded. The SLC team continues to be appropriately resourced with stakeholder engagement officers and community liaison personnel to deliver the stakeholder engagement requirements.

## **6.8 Community grievance mechanism**

Since September 2022, the Project has received the following community grievances (excluding those related to labour and working conditions, which are summarised in section 7.6):

- Three separate grievances in November and December 2022 related to the availability of equipment in the LDPj Building Business project.
- Two grievances in January and February 2023 related to the training provided under the LDPj Building Business project.
- One grievance in March 2023 related to high electricity bills and a non-functional solar panel installed for the school as part of the infrastructure component of the Education project.
- One grievance in May 2023 related to an incident of flooding linked to blocked drainages in proximity to the ORF.

During the site visit, the Eni Ghana team described the steps taken to investigate and resolve these grievances and the IESC is satisfied that appropriate approaches have been taken. All the above grievances have been closed in reasonable timescales, except for the one related to the flooding incident. This is still open as Eni Ghana are undertaking a technical assessment and implementation of mitigation plans to help avoid future impact of flooding, as part of ongoing support to the Sanzule community. The additional time taken to properly investigate this

grievance is appropriate, and IESC is satisfied that steps are being taken to resolve the grievance.

## **6.9 New Bakanta Road**

The local community Chiefs have raised a request to the Ghana Petroleum Commission for a new 3.2km road to be developed to the community of Bakanta. The Petroleum Commission have agreed that Eni Ghana can build the road, and Eni Ghana have started the procurement process for engineering studies to be done by a consultant. The basis for the engineering study is for the road to be developed principally along an existing transmission line. This route is currently classed as a feeder road, though it a footpath that cannot be used by vehicles with the exception of 0.25 km thus Eni Ghana will be upgrading it rather than creating an entirely new road. Eni Ghana have also decided to undertake an Environmental and Social Impact Assessment (ESIA) for the road. This is an internal decision as it is not required under national regulation. The ESIA will be procured separately to the engineering studies and may be conducted by a separate consultant. Eni Ghana currently plan for the engineering studies to be finished in January or February 2024, and for the ESIA to be done in the first quarter of 2024.

The IESC has recommended that Eni Ghana ensure some overlap in timing between the engineering and the ESIA studies so that the findings of the ESIA can be used as input to engineering decisions. The IESC has also recommended that Eni Ghana engage with the local communities to help ensure that the proposed route is acceptable to the community, and that this engagement also is used to feed into the engineering studies and ESIA. The ESIA and engagement process should consider the protection of ecological sensitivities, including existing swamp habitat, and the need to find a balance between supporting community development and protecting natural habitats.

## **6.10 Emergency Response Planning**

The IESC previously noted that an oil spill response exercise conducted in November 2021 was desk based and did not require the mobilization/deployment of any response personnel or equipment. It was therefore recommended that an oil spill exercise, inclusive of deployment of equipment, be conducted in 2023.

At the time of the visit in September 2023, a full-scale emergency exercise had been conducted requiring deployment of equipment. The IESC has reviewed the emergency exercise report and notes the exercise to be carefully planned and executed. A small number of findings requiring corrective actions were identified relating to better use of response software and communications difficulties experienced by a new member of the Emergency Response Team (ERT). However, the exercise scenario did not involve an oil spill and therefore the earlier recommendation for a full-scale oil spill exercise (with deployment of personnel and equipment) remains applicable – see findings 003\_ 9/22, Appendix 4.

## **6.11 Closure of earlier IESC findings**

The IESC's September 2022 site visit identified 32 findings, many of which had recommended corrective actions. Where possible the IESC has revisited these findings within this report and described progress made towards the closure of earlier findings. Of the 32 findings made, 12 remain open/in progress with the others having either been closed, superseded or on hold.

The 'open' issues identified in the previous monitoring visits are tabulated in Appendix 4 with an indication of the current status of each issue provided by the IESC following this September 2023 site visit. Previously 'closed' items have been removed from Appendix 4.

**Table 6-1: Summary of Findings, PS1**

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
001_9/23	Influx monitoring	<p>In the last IESC monitoring report, the IESC noted that there remains no conclusive evidence of notable influx created by the Project, and as the Project has now moved well into the production phase the employment and economic opportunities afforded by the Project/construction workforce have significantly reduced, thus making influx less likely compared to the situation in 2019. The Eni Ghana team have compiled published data on population change in the broader area as well as run community focus groups with opinion leaders of the four communities in Eni Ghana's Direct Area of Influence to gather feedback on the perspectives on influx.</p> <p>Based on the information provided during the site visit and in the previous influx monitoring reports, the IESC would support a recommendation that the influx monitoring can be closed, though this is conditional on the IESC reviewing the actual content and recommendation to be given in the monitoring report.</p>	IFC PS1	A monitoring report should be prepared by Eni Ghana to reflect the published data compiled in 2023 (plus the additional data for other Districts and Ghana as a whole) and to report on the findings of the focus groups. The report should give a recommendation on the need for further influx monitoring.	<b>Minor</b> (Q1 2024)
002_9/23	Community investment: development of Bakanta road	Following a community request, Eni Ghana are planning the development of an upgraded feeder road for the community of Bakanta and have started the procurement process for engineering studies to be performed by a consultant. Eni Ghana have also	IFC PS1	Eni Ghana ensure should some overlap in timing between the engineering and the ESIA studies so that the findings of the ESIA can be used as input to engineering decisions. Eni Ghana should also engage with the local	<b>Moderate</b> (Q1 2024)

		decided to undertake an ESIA for the road. The ESIA will be procured separately to the engineering studies and may be conducted by a separate consultant. Eni Ghana currently plan for the engineering studies to be finished in January or February 2024, and for the ESIA to be done in the first quarter of 2024.		communities to help ensure that the proposed route is acceptable to the community, whilst also recognising the need to protect natural habitat, and that this engagement also is used to feed into the engineering studies and ESIA.	
003_9/23	Cumulative Impacts	Eni has managed to progress efforts in respect to management of cumulative impacts, notably in terms of inclusion of biodiversity matters and the membership of the platform. However, disagreement over the funding mechanism remains a significant barrier to the functioning of the platform and technical working groups.	PS1	<p>Ongoing efforts are required to resolve disagreement over the funding mechanism and to transfer Secretariate duties.</p> <p>The IESC recognises the multi stakeholder nature of the platform and the limitations faced by Eni Ghana as a single operator. Nevertheless, it should continue to use its best endeavours to resolve the issue highlighted above.</p>	<b>Moderate</b> (ongoing basis)

## 7. PERFORMANCE STANDARD 2: LABOR AND WORKING CONDITIONS

### 7.1 Introduction

This section covers the following topics:

- Equal opportunity for women workers and potential for workplace harassment;
- Contractor management of worker welfare;
- Worker accommodation;
- Mental health support; and
- Occupational Health and Safety.

As context, Table 7-1 presents the employment breakdown for the main operational facilities: the ORF and the FPSO. The total workforce at each site is provided for both direct workers (employed by Eni Ghana) and for contracted workers; however, the breakdown of the employment data into worker categories (such as females or workers from the DAoI<sup>17</sup>) applies to the total number of workers only. The increase in contracted workers at the ORF from June 2022 to June 2023 relates primarily to the construction of the load bank installation and warehouse upgrade.

**Table 7-1: ORF and FPSO Employment Breakdown**

Location	Year	# Total Workers (Direct: contracted)	#Females	# Ghanaian	# DAoI	# Expatriates
ORF	12/2019	154 (38:116)	4	148	21	6
	12/2020	43 (35:8)	0	39	0	4
	04/2021	114 (32:82)	18	108	48	6
	06/2022	132 (35: 97)	17	108	27	23
	06/2023	319 (31: 288)	56	294	95	25
FPSO	12/2019	209 (15:194)	1	130	0	79
	12/2020	199 (16:183)	1	129	0	70
	04/2021	201 (16:185)	1	135	0	66
	06/2022	212 (15: 197)	1	151	0	61
	06/2023	215 (15: 200)	10	152	0	63

Source: Data for 06/2023 from Quarter 2 2023 QMR. Data for previous periods as reported in IESC monitoring report for September 2022.

**Table 7-2: Accra and Takoradi Employment Breakdown**

Location	Year	# Total Workers (Direct: contracted)	#Females	# Ghanaian	# Expatriates
Accra	06/2022	285 (115:170)	121	258	27
	06/2023	312 (111:201)	114	286	26
Takoradi	06/2022	168 (5:163)	16	155	13

<sup>17</sup> DAoI is the Direct Area of Influence (of the OCTP Project), consisting of four nearby villages.

	06/2023	169 (5:164)	25	155	14
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Source: Data for 06/2023 from Quarter 2 2023 QMR

The 2023 employment breakdown data for the Accra office and Takoradi Logistics base, presented in Table 7-2 above, shows no significant change on the previous year.

## 7.2 Equal opportunity for women workers and potential for workplace harassment

In the September 2022 monitoring report, the IESC noted that:

- There was a low proportion of women workers at the ORF and FPSO, and the IESC recommended that a review was done to identify whether there are any work practices or issues that are directly or indirectly limiting participation by women, and to identify measures to revise these practices and help ensure equal opportunity and a supportive work environment for women at the ORF and FPSO; and
- The low number of women workers at the ORF and FPSO has the potential to heighten risks of gender-based violence and harassment (GBVH) for these women, particularly given the remote nature of the sites<sup>18</sup>, and made recommendations to reduce this potential risk.

Eni Ghana have responded positively to these recommendations. On the first point, the Human Resources department reviewed the potential issues or barriers to participation by women, and received feedback from women workers during a Women's Day event. A key finding of the review is that the Project workers are typically at an age when they are having and raising children, and that remote work and work on rotation is generally not favoured by women at this time, leading to very low numbers of applications for these positions. The Project team have identified and implemented other approaches to increase participation by women by:

- Supporting participation by women in their National Service employment programme, for which 17 out of the 44 graduates were women; and
- Promoting broader participation by women and girls in the Science, Technology, Engineering and Mathematics (STEM) field, by running awareness sessions for female Junior High School Students in selected schools in the Project area.

The IESC considers that these are meaningful initiatives to support participation by women both in the short-term and directly in relation to the Project, and for longer-term participation by women in STEM fields more broadly across the oil and gas sector and beyond.

On the second point, Eni Ghana have undertaken a number of initiatives, building on its Zero Tolerance Policy "Eni Against Violence & Harassment in the Workplace" which was launched in 2021. These have included:

- An awareness campaign in February 2022 to foster awareness of the details of the policy and the company's zero tolerance against violence & harassment in the workplace;
- A townhall event for all staff in December 2022, including staff in the operational sites, to highlight awareness on the policy, including reporting mechanisms;
- From June 2023, engaging external staff in the Logistics Base and ORF on the policy;
- In September 2023, Eni Ghana rolled out a mandatory training course to strengthen awareness of the rules pertaining to violence and harassment for all staff;

<sup>18</sup> As a proxy indicator of the contextual GBVH risk for women in Ghana, the Institute of Development Studies and Ghana Statistical Services report *Domestic Violence in Ghana: Incidence, Attitudes, Determinants and Consequences* (2016) found that 30 per cent of surveyed women experienced domestic or non-domestic sexual violence at least once over their lifetime.

- The principles in the zero tolerance policy has been highlighted in the Security Induction document for operational sites, to be highlighted to all who visit the sites.

Eni Ghana also have a reporting mechanism for GBVH incidents, with an online mailbox that allows anonymous reporting. Submissions through this mailbox are reviewed by a team who have been trained in GBVH issues, and they will involve other members of the Eni Ghana team in the investigation if appropriate. This reporting mechanism is being rolled out in September 2023 and by the time of the site visit they had not had any GBVH issues raised through it. As well as this mechanism, any worker with a GBVH complaint can go to the Eni Ghana Human Resources department, which includes women members of staff.

### **7.3 Contractor management of worker welfare**

The IESC discussed with Eni Ghana Human Resources Department and the ORF Community Labour Relations Officer the actions arising from the last IESC monitoring that related to the following labour and working conditions issues raised by some of the contractor workers<sup>19</sup>:

- Overtime paid at rates lower than their standard wages.
- There were some poor supervisory practices, with one case reported of verbal abuse of workers, and some workers have concern of retribution when raising grievances due to these supervisory practices.
- Management sought to influence workers over workers' decisions on unionisation.
- Workers did not receive pay increments when renewing contracts.

The IESC found that Eni Ghana has investigated these issues and has strengthened its processes to help identify and remedy issues for contractor workers. Specifically, Eni Ghana undertook the following actions:

- Investigated the issues raised related to overtime and found this was an isolated issue for some workers which has now been resolved, with rates for overtime now defined;
- Investigated the issues raised about salary increments and confirmed that increments are being given, including cost of living increments for at least one of the contractors;
- Investigated amongst contractors, with one group of contractor workers currently considering unionisation and no findings that they were being prevented from doing so; and
- Eni Ghana also undertook a communications campaign about the worker grievance mechanism (see section 7.66).

The Eni Ghana team also described an appropriate approach to monitoring labour and working conditions for contractor workers, by conducting informal discussions to hear feedback, by allowing workers to raise grievances directly to Eni Ghana if they wish, and to review contractor worker grievances raised to the contractor. The Eni Ghana team raise known issues to contractor management for resolution.

IESC undertook four group interviews with workers from three contractors working at the ORF as well as direct employees of Eni Ghana. The workers provided feedback on a number of positive aspects related to their working conditions, with workers reporting that they have contracts of employment, are generally paid on time, are satisfied with the occupational health and safety provisions, and have no issues of concern related to accommodation. Some of the workers described the following issues of concern:

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<sup>19</sup> As was noted in the last IESC monitoring report (September 2022), these issues were raised by a small number of contractor workers, and within the scope of the September 2022 site visit the IESC was not able to verify the accuracy of the reported issues or to further investigate the prevalence of the issues stated above.

- Overtime not being paid, though it was noted that overtime is rarely undertaken and so this non-payment is a rare occurrence.
- Some delays in wage payments, of a few days.

The IESC is satisfied that Eni Ghana are actively identifying and managing these specific issues and are working with contractors to help ensure that contractors address the concerns.

A small number of interviewed workers also referred to the perception that some Contractor workers do not get the same pay, allowances and bonuses as Eni Ghana or other contractors, and there was also a perception that they should be given additional allowances for working in what they perceive to be a 'high risk' environment. The IESC notes that these issues with pay differentials are principally commercial issues and that market rates for workers under different contractors will legitimately differ for various reasons and do not indicate a non-compliance with PS2. This observation does, however, prompt the need for Eni Ghana to sensitively raise awareness about the safety situation at the ORF so that contractor workers have a realistic perception of safety risk and to help resolve any excessive concerns or incorrect perceptions, and also to help to manage rumours about the differences in pay between contractors and to explain the reasons for these differences.

#### **7.4 Worker accommodation**

The IESC has undertaken inspection of the Pilot and Permanent accommodation blocks at the ORF in previous visits<sup>20</sup> in which no significant findings have been made. Consequently, no inspection of accommodation was conducted during this visit, other than to confirm workers are still provided with single occupancy rooms with bathrooms. It was further reconfirmed during the walkover inspection that separate female toilet blocks are available in communal areas.

#### **7.5 Mental health support**

In the September 2022 monitoring report, the IESC recommended that a mental health awareness campaign is run to support awareness of mental health issues and to signpost to available support resources, including those provided by Eni Ghana. Eni Ghana have designed and are now rolling-out a mental health support program, with a series of awareness sessions being implemented from September 2023. The first webinar, 'Introduction on Mental Health' took place on 19th September 2023, with 182 participants covering all sites, including at Eni Ghana office in Accra, Takoradi logistic base, the ORF and the FPSO. This was available to contractor workers as well as direct Eni Ghana employees. Eni Ghana are also planning (not yet implemented) an Employee Assistance Program (EAP), which will provide a dedicated telephone line to provide support on an anonymous basis, including in relation to mental health. In addition to support provided through the EAP, workers (including contractor workers) will be entitled to up to three sessions of one-on-one counselling with a psychologist.

The IESC considers that this is a comprehensive support program, particularly in being open to contractor workers, and addresses the IESC's recommendation from the last monitoring report.

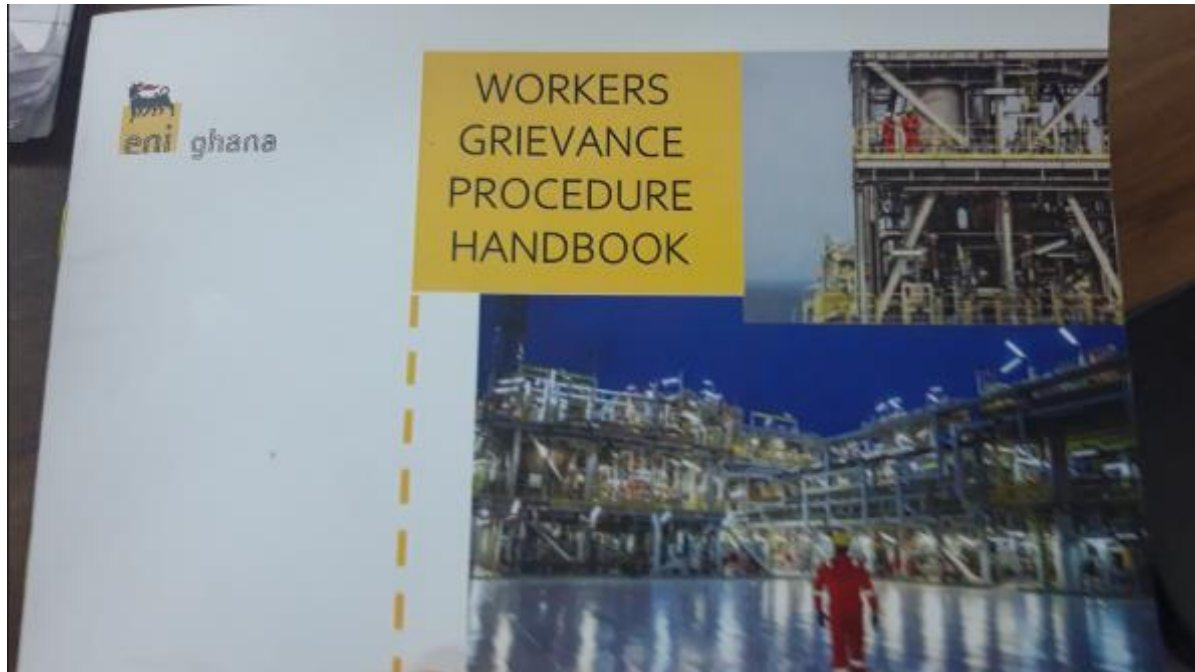
#### **7.6 Worker grievances**

Since the last IESC monitoring visit, Eni Ghana has undertaken a communications campaign about the worker grievance mechanism, including refresher training for all contractor workers from April to June 2023, provision of posters to describe the mechanism, making a QR code / web link available for online grievance submission, and provided a handbook about the grievance mechanism to all workers (Figure 7-1).

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<sup>20</sup> See findings in the IESC's 2022 monitoring report





**Figure 7-1: Workers Grievance Procedure Handbook issues to workers**

In the period September 2022 to September 2023, there were two worker grievances raised to Eni Ghana and six raised to contractors. The grievances involved one case of appeal for a contract renewal, three cases involving isolated workers who had experienced unpaid wages, three cases of workers that raised requests for increased salaries, and one case related to the payment of quarantine allowances. The IESC reviewed these cases through discussion with the SLC team and is satisfied they have been investigated and resolved appropriately. The cases involving unpaid wages were resolved with payments being made within 20 days of the grievance being raised. The only grievance that is still open is the one related to the quarantine allowance, and IESC notes that there are valid reasons for this one to remain open while the resolution is implemented. The IESC is satisfied that the worker grievance mechanism is being well communicated to Eni Ghana and contractor worker, that it is being used, and that grievances are being investigated and resolved appropriately.

## **7.7 Occupational health and safety**

### **7.7.1 H&S Performance**

The Project continues to demonstrate very positive H&S metrics with zero recordable incidents since the IESC's previous site visit in September 2022. This level of performance dates back several years with zero Loss Time Incidents (LTI) in the preceding 4/5 years at the ORF and FPSO respectively.

Going forward, a challenge for Eni Ghana will be to maintain this high level of performance and avoid the onset of complacency. Eni Ghana recognises the need to continually reinforce H&S messages and to create new initiatives and means of messaging H&S to maintain interest and awareness. In this respect, in addition to H&S initiatives detailed in previous IESC reports, Eni Ghana has launched its HSE Play and Learn initiative and an HSE Observations app uploaded to all employees' mobile phones to encourage reporting of HSE observations. For the former, the initiative takes the form of a fun quiz with small prizes awarded to the winning participants.

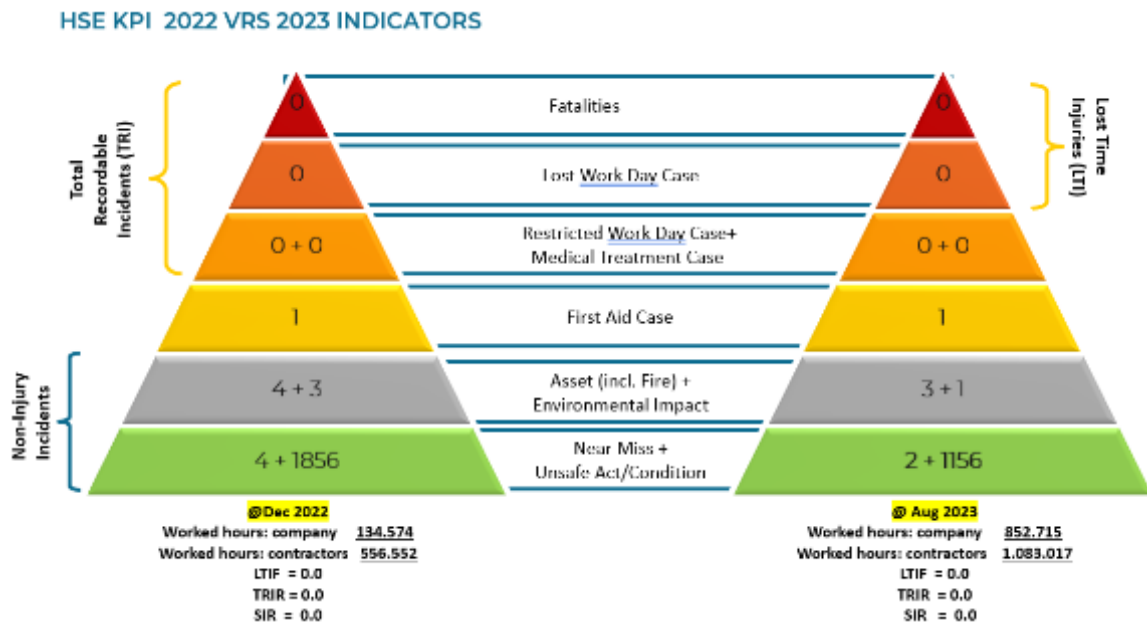


Figure 7-22: Key HSE Key Performance Indicators for 2022 and 2023<sup>21</sup>

### 7.7.2 Electronic Permit to Work

The Electronic Permit to Work (ePTW) system was described in preceding IESC monitoring visits. Use of the ePTW has continued to be rolled out and is used for all hazardous works undertaken in all locations with the exception of certain tasks outside of the main facility boundaries. The IESC was provided with a demonstration of the ePTW which entails several approval gates prior to a work task being allowed to proceed. With respect to the ORF, the IESC understands the relevant H&S and Operations personnel meet daily to discuss and approve the batch of work permits needed for the following day. The meeting is attended by the Operations Manager who provides the ultimate approval; it is understood the daily volume of permits to work is considered manageable and decisions are not made under time pressure. Permit requests are occasionally rejected and postponed pending further information on measures in place to manage risks.

For work performed outside of the ORF fence line, the original paper based PTW system is used. Work performed outside the fence line includes the biodiversity related tasks, for example, installation of bird nests in trees as part of the No Net Loss strategy. Noting the inherent risks associated with this activity (working at heights/use of ladders, wildlife, uneven surfaces) the IESC requested evidence that ESL’s activities were subject to a Job Safety Analysis (JSA) and PTW. Eni Ghana confirmed that such procedures applied to ESL’s work and provided evidence accordingly.

### 7.7.3 Site walkover

An inspection of the site was conducted during a walk over survey. Although the entire site was visited, special attention was given to the areas listed below. Where applicable, opportunities for improvement (OFI) are recommended.

- Ongoing construction of the Load Bank installation
- Areas subject to reinstatement

<sup>21</sup> NM + UA/UC refers to Near Misses plus Unsafe Acts/unsafe conditions.

- The plant nursery
- Beach crossing of the Gas Export Sealine
- Pipeline right of way (RoW) – beach to ORF and ORF to GNGC pipeline tie in.
- Warehouse
- Pilot camp

Contrary to the IESC's initial perception, the Load Bank facility is small and located within the boundary of the ORF inner fence line. Construction of the Load Bank was almost complete with very limited activities ongoing at the time of the visit (one individual present). No observations are made in relation to the Load Bank installation.

#### *Plant nursery*

Access to the plant nursery is via a short slope descending from the side of the road (see Photo 1, Appendix 5). During the visit, one of the observers had a minor slip. Although the slip did not result in a fall, the incident should be considered as a near miss. Eni Ghana should assess the risks and ensure better access to the nursery; this will likely entail a small number of steps to ensure safe access.

#### *Areas subject to reinstatement*

The area undergoing reinstatement at the old Consar workshop area was visited. This area is currently undergoing a programme of invasive species removal, with teams from ESL on the ground removing the invasive grass species *Imperata cylindrica*. During the site visit old security fencing and barbed wire was seen to be in a poor condition with the metal fencing having collapsed and barbed wire rusted and loose (see Photos 2 and 11, Appendix 5).

#### *Pilot Camp*

Similar examples of loose barbed wire were noted at the Pilot Camp, presenting a hazard to residents of the Pilot Camp who typically would not be wearing PPE. The IESC therefore recommends an inspection of all fencing around the site; corroded/loose fencing and barbed wire should be repaired or removed if there is no longer a requirement for the fence.

Metal boxes housing fire hoses were also badly corroded within the Pilot Camp grounds with the potential that fire hoses could not be readily accessed (if corroded handles failed). The high levels of corrosion would appear to be due to Project's location in a corrosive coastal environment. Eni Ghana is fully aware and there is an ongoing programme to replace corroded housing; some new housing units for fire hoses were evidenced during the site visit. Given the corrosive environment Eni Ghana should consider the use of non-metallic materials when replacing the corroded hose housing.

Elsewhere within the Pilot Camp other corrosion issues were observed. Of note, one of the fire water storage tanks had a significant corrosion induced leakage (see Photo 13, Appendix 5) with multiple implications, including: i) reduce volume of water in the tank available for use in the event of a fire; ii) resource (water) usage to top up the tank; and iii) pooling of water adjacent to the tank which provides habitat for breeding mosquitos (see Photo 14, Appendix 5). Elsewhere in the Pilot Camp, redundant equipment has not been decommissioned, allowing rainwater to pool and similarly providing potential habitat to mosquitos to lay their eggs (see Photo 12, Appendix 5).

#### *Warehouse*

The warehouse upgrade was largely complete however some limited construction works (final fittings) remained ongoing. The warehouse is used for the storage of equipment, spares and

hazardous materials and was in use at the time of the visit. A number of opportunities for improvement were identified as listed below:

- Racks in the warehouse were not secured thus risking a domino effect if one rack was to topple.
- Lighting in the warehouse was not functioning on the day of the visit.
- A ladder used to access racks at height was reportedly tested, however the inspection date was not visible on the ladder because a non-permanent marked had been used to record the test. It is therefore not possible to know when the ladder was last tested.
- Gas cylinders that had been secured to a dividing wire fence as a temporary measure were at risk of toppling over (see Photo 8, Appendix 5). The IESC was informed that gas cylinder racks had been procured but not yet installed. Installation is required as a priority.
- Hazardous materials (typically oils and lubricants) were stored in designated areas with labels on the wall. In some instances, the actual container did not have a label (see Photo 9, Appendix 5). This practice presents a risk of misidentification if a material is stored in the wrong location. All containers should therefore have labels identifying their contents.
- Fire extinguishers were stored loose in non-designated areas.

Actions are required to address each of these observations as a priority. Each can be readily addressed and indeed the IESC was informed they were being addressed even before the site visit was concluded. In isolation, the observations noted do not present a significant risk, however, of more concern is the commissioning of a warehouse that is not completed with respect to all H&S provisions. It is therefore recommended that future buildings are formally inspected by H&S representatives to ensure adequate H&S provisions are in place before their use.

**Table 7-3: Summary of Findings, PS2**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard</b>	<b>IESC Recommendations</b>	<b>Significance</b> (indicative date for completion)
004_9/23	Worker communications	A small number of interviewed workers referred to the perception that some Contractor workers do not get the same pay, allowances and bonuses as Eni Ghana or other contractors, and there was also a perception that they should be given additional allowances for working in what they perceive to be a 'high risk' environment. The IESC notes that these issues with pay differentials are principally commercial issues and that market rates for workers under different contractors will legitimately differ for various reasons and do not indicate a non-compliance with PS2.	IFC PS2	Eni Ghana to sensitively raise awareness about the safety situation at the ORF so that contractor workers have a realistic perception of safety risk and to help resolve any excessive concerns or incorrect perceptions, and also to help to manage rumours about the differences in pay between contractors and to explain the reasons for these differences.	<b>Not Applicable</b> (opportunity for improvement rather than a non-compliance) Q2 2024
005_9/23	Occupational Health and Safety	The IESC notes that the SLC team based at the ORF spend a lot of time in communities, where there are some hazards that could result in injury. This includes the potential for trips and falls, cuts, and snake bites. While the SLC team are provided PPE for field work, there has not been a comprehensive risk assessment for the tasks conducted by the SLC team.	IFC PS2	Undertake a risk assessment exercise for the tasks conducted by the SLC team, using similar approaches as for the activities undertaken within the ORF. This will help to ensure that all risks have been identified and appropriate controls are put in place.	<b>Moderate</b> (Q1 2024)
006_9/23	Slip/fall hazard	Access to the plant nursery is via a short slope which presents a slip and fall hazard to users of the nursery.	PS2	Eni Ghana should ensure better access to the nursery; this will likely entail a small number of steps to ensure safe access.	<b>Minor</b> (within 3 months)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
007_9/23	Corrosion induced hazards	<p>Corroded and loose security fencing and barbed wire was noted in several locations presenting a risks of trips and cuts.</p> <p>Metal boxes housing fire hoses within the Pilot Camp grounds were also badly corroded with the potential that hoses could not be readily accessed.</p>	PS2	<p>Inspection of all fencing around the site; corroded/loose fencing and barbed wire should be repaired or removed if there is no longer a requirement for the fence.</p> <p>Given the corrosive environment at the ORF, Eni Ghana should consider the use of non-metallic materials.</p>	<b>Minor</b> (within 3 months)
008_9/23	H&S risks - warehouse	The warehouse construction was largely complete however some limited construction works (final fittings) remained ongoing. The warehouse was in use despite ongoing finalisation of works. Several H&S observations were made.	PS2	<p>Actions are required to address each of these observations as a priority.</p> <p>It is therefore recommended that future buildings are formally inspected by H&amp;S representatives to ensure adequate H&amp;S provisions are in place before their use.</p>	<b>Moderate</b> (as soon as possible and no later than 2 months after the site visit)
009_9/23	Pooled water -	A leaking firewater storage tank and another area due for decommissioning are providing habitat for mosquitos to lay eggs.	PS2	<p>The tank should be replaced. If the leakage was caused by metal corrosion consideration should be given to procurement of plastic tank.</p> <p>Equipment that no longer has a function should be decommissioned and removed from site.</p>	<b>Minor</b> (within 3 months)

## 8. PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION

This section considers the management and monitoring of key environmental impacts associated with the Project and the Project's commitments to the prevention of pollution and promotion of resource efficiency. Key aspects relevant to the Project include:

- Surface water, including oil sheens;
- Offshore environmental monitoring (water, sediments, fauna and air quality)
- Wastewater effluent, including produced water;
- Air quality (including stack emissions and flaring);
- Greenhouse gas emissions;
- Noise; and
- Waste management.

### 8.1 Oil sheen

The IESC previously reported on the intermittent occurrence of oil sheens which were confirmed to be originating from a sub-surface leak from the OP-7 well since May 2021. The leak originated from the OP7 Xmas tree and was initially controlled by injection of methanol and then subsequently by a combination of a sealing chemical and methanol injection. At the time of the IESC's September 2022 site visit there had been no evidence of a sheen for the preceding 4 weeks, however Eni Ghana recognised that the solution was a temporary solution and that a permanent solution was required.

Further oil sheen was detected close to GI-1 well (an oil producer) in January 2023. The source of the leak at GI-1 was found to be the same as for the OP7; a component in the Xmas tree. The second leak was successfully treated in the same manner as OP7 using methanol injection and a chemical sealant. There has been no evidence of sheens within the OCTP concession since April 2023.

In parallel with the temporary solution, Eni Ghana has been working with the manufacturer of the Xmas tree to identify a permanent solution. A technical concept, finalised in June 2023, has been developed which involves the attachment of a new 'mini tree' to the existing tree. The approach has a number of advantages, including: i) no requirement to remove the existing Xmas tree (no need for a rig); and ii) the concept/equipment is based on proven technology. At the time of writing, engineering studies were ongoing and mini tree deployment is scheduled for 2024. In the meantime, Eni Ghana is committed to continued monitoring for further oil sheens using a combination of satellite imagery (twice a month), localised vessel surveys (weekly) and helicopter surveys.

In the event of further sheens from OP7, GI-1 or any other oil producing wells, further temporary interventions will be possible and Eni Ghana also has the ability to shut down wells at any time and thereby stop any significant oil release.

### 8.2 Offshore monitoring campaign

Eni Ghana has performed a series of biennial offshore monitoring campaigns with previous campaigns undertaken in 2017 and late 2018. Both these campaigns were led by the specialist oceanographic survey company, Tecnoambiente, based in Spain, with local support from ESL. A further campaign was scheduled for mid-2021 but was delayed until April 2022 because of COVID-19 travel restrictions. At the time of the previous 2022 IESC monitoring site visit the campaign report had not been finalised, however the IESC met virtually with a new survey team

from Freddie Jordan Oil Company Limited, to discuss the survey findings and reported its findings accordingly. The IESC has since received the survey report dated December 2022. The IESC's findings are repeated in this report and updated as necessary following review of the final Offshore Survey Report.

The offshore sampling programme was intended to duplicate earlier campaigns with the following objectives:

- Determine water column characteristics in the study area;
- Assess planktonic communities;
- Determine characteristics of the seabed sediment, with specific reference to various biological, physical, and chemical sampling parameters;
- Document the existing state of the marine environment;
- Carry out air quality monitoring to evaluate impacts to air quality from offshore activities.

The scope of the survey was comprehensive and broadly in line with the programme detailed in Eni Ghana's Environmental Monitoring Programme. However, it is noted that some of the sampling coordinates provided by Eni Ghana had not been previously sampled in 2017 and/or 2018. Also of note, the survey was conducted in April and May whereas the preceded campaign in 2018 was conducted in November and December.

Key findings from the survey campaign are as follows:

- Certain nearshore arsenic and barium concentrations in sediments were elevated compared to 2017/2018.
- Metal concentrations in offshore sediment were generally lower in 2022, except for arsenic and barium in isolated cases. In particular, barium is significantly elevated, exceeding Threshold Effect Levels (TEL) around the wells. This is attributed to drilling activities in the offshore monitoring report and seems the most likely explanation.
- Total petroleum hydrocarbons were elevated in 4 sampling locations (up to 4,800 mg/kg) although below Dutch intervention values of 5,000 mg/kg set for impacts to infauna. Conversely, the report cites research indicating high likelihood of impact to benthic macrofauna at levels above 2,144 mg/kg, a value that was exceeded in sediments analysed.
- Air quality measurements, intended to assess the impact of the flare on the FPSO, were below international threshold limits with the exception of
  - one station, 2 km SW of the FPSO for SO<sub>2</sub>; and
  - a second station 6km NE of the FPSO where PM<sub>10</sub> measurements were elevated.

The survey team believe these were anomalous results, on the basis that the wind direction was not from the FPSO and given the distance from the flare.

It is understood that sampling points on the vessel were positioned to avoid influence from the vessel's exhaust. Nevertheless, it is highly likely that the elevated SO<sub>2</sub> and PM<sub>10</sub> measurements will be a result of vessel emissions rather than the FPSO, particularly when noting samples were taken simultaneously from the front and rear of the vessel over 24-hour periods. To emphasise this point, a measurement of 66 ug/m<sup>3</sup> for Total Particulates was measured at the rear of the boat. This compared to <4ug/m<sup>3</sup> for a sample collected at the same time from the front of the boat.



In its preceding report the IESC made a number of recommendations as follows:

1. The influence of seasonality on survey results, if any, should be described in the report.
2. Sample results from the recent survey should be compared with both 2017 and 2018 results and any baseline survey results where possible.
3. Careful interpretation of the elevated As and Ba results in sediments, including potential for bioaccumulation/toxicity on benthos and commentary on whether the same locations had been previously sampled in 2017/18.
4. Lesson learned should be clearly described, for example, problems associated with laboratory analysis timeframes that may have invalidated (high) total coliform results.

Following review of the report it appears that recommendations 1) and 2) were not considered in the final report. The recommendations should therefore be captured within the Terms of Reference (ToR) for any future offshore survey. A detailed ToR will be required to ensure that future survey results can be compared with those of the 2022 and previous campaigns to the extent possible. The IESC understands future offshore survey monitoring campaigns will be awarded in 2025 via a competitive tendering process. It is therefore possible that a different contactor will be awarded the work, further emphasising the need for a tightly specified Terms of Reference, including consideration of seasonal effects, sampling methodologies, analytical techniques (noting recommendation 4 above), confirmation of necessary limits of detection (if measure trace metals in fish tissues) and interpretation of analytical results. The value of air quality monitoring in offshore areas, significant distances from receptors, should also be evaluated.

With respect to recommendation 3), the IESC has been informed that further studies are being commissioned to measure metals in fish tissues.

The IESC was informed that commencement of monitoring campaigns/ commissioning of consultants and other services has been delayed whilst approval from GNPC (a non-operating partner) has been sought. Given the importance that monitoring campaigns are conducted at specific times of the year to take account of seasonality issues/ensure comparability of different surveys, going forward it is recommended contingency is built into the procurement process.

### **8.3 Onshore Monitoring**

#### **8.3.1 Surface water**

ESL has been retained in 2023 to continue the quarterly monitoring programme, sampling from the same locations used during the construction phase. The sampling programme meets with the requirements specified in the Onshore Environmental Monitoring Programme for Production Phase of OCTP Phase 2 (prg ms hse 011 eni ghana r00).

Monitoring results have been reviewed for the period Q3 2022 through to Q2 2023, however no results are available for Q1 2023 because ESL's contract was not renewed in time to allow for monitoring effort in this time period. The IESC understands delays associated with approval from GNPC are a factor leading to the delay (see recommendation above).

Parameters measured in surface waters were typically below relevant limits with some exceedances of turbidity limits at sampling location SW04 (close to the Pilot Camp) during heavy rainfall in late 2022 that was attributed to localised soil erosion. The IESC notes that reinstatement/revegetation of disturbed areas has generally been successful (Photo 5, Appendix 5) and drainage channels are also vegetated and expected to minimise the levels of suspended sediments discharged to swamp areas (Photo 3, Appendix 5). However, some localised erosion

was observed during the site visit that is likely to have contributed to the high turbidity measurements (Photo 4, Appendix 5). Despite a generally successful reinstatement programme, ongoing reinstatement efforts are needed to stabilise residual areas of bare earth.

### 8.3.2 Waste-water effluent

Effluent discharged from the three sewage treatment plants (STPs) located at the ORF, permanent camp and pilot camp were analysed for microbiological and physicochemical parameters as part of the routine monitoring programme. For all three STPs, total coliforms, including e coli, in treated effluents were found to exceed applicable limits. Similar findings were highlighted in the IESC's previous monitoring report, indicating the non-compliant discharge has been ongoing for over 12 months.

As reported previously, Eni Ghana halted the discharge of treated wastewater to a soakaway and instead the effluent from the STPs has been collected by Eni Ghana's waste contractor for treatment in a municipal treatment works and consequently, the non-compliant effluent does not pose a risk to environmental quality. Nevertheless, transportation of sewage offsite should not become the permanent solution and it is recommended to further investigate the reason for the STPs malfunctioning and implement corrective measures. Once corrective measures are completed, the frequency of effluent monitoring should be increased until there is confidence the STPs are functioning correctly.

### 8.3.3 Produced Water

A relatively small volume of produced water from the oil wells is being generated for the first time since November 2022. The FPSO is design for the reinjection of produced water however the current volumes (approximately 4,500 BWP) fall well below expectation and the system's minimum design capacity of 13,500 BWP. Consequently, produced waters to date have been collected in a holding tank to allow removal of surface oil before being subsequently analysed for oil content<sup>22</sup> prior to overboard discharge to sea.

Oil concentrations have been measured to be less than 8.9 ppm. This is reportedly below the national limit and also the IFC limit<sup>23</sup> of 42 mg/l daily maximum; 29 mg/l monthly average for oil in produced water discharge to open sea.

Whereas discharge to sea is permissible, it does not represent best practice. Eni Ghana is fully aware reinjection is considered a best practice and has a programme in place to ensure reinjection can commence, as per the original intent, in the near future. In this regard, works have been undertaken to modify the reinjection system to allow for smaller volumes of water reinjection (800 BWP). Currently the bacteria profile of the produced water is being studied to ensure there is no bacteria present that could damage the formation e.g. sulphate reducing bacteria. Eni Ghana is hoping to start the reinjection of produced water by the end of 2023 pending results of the bacteria profiling. In the interim, produced waters should be treated to the extent possible and as a minimum be compliant with national and IFC limits before discharge to sea.

## 8.4 Air quality

### 8.4.1 Ambient air quality

The IESC has reviewed ambient air quality results since Q3 2022 through to Q2 2023 (with no results available for Q1 2023 for the reasons described above) for the purposes of this reporting

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<sup>22</sup> Oil concentration is monitored automatically at the tank and also via samples analysed by Eni Ghana and Yinson as operator of the FPSO.

<sup>23</sup> EHS Guidelines for Offshore Oil and Gas Development, June 2015. Discharge to sea is allowed if oil and grease content does not exceed 42 mg/l daily maximum; 29 mg/l monthly average.

period. Samples analysed for NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub> and total particulates were below Project standards on all occasions.

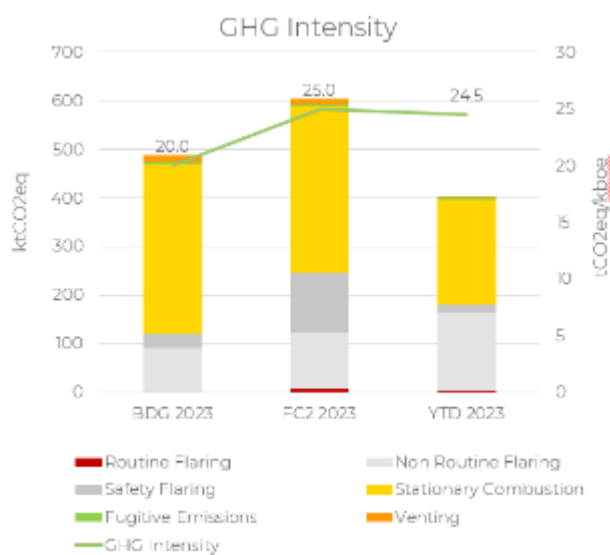
### 8.4.2 Flaring

Eni Ghana has also committed to implement a Zero-Permanent Flaring policy and will implement measures for minimization of venting and flaring (consistent with the Global Gas Flaring and Venting Reduction Voluntary Standard) and minimization of fugitive emissions.

In 2022, Eni Ghana reported flaring of 3,484 mmscf at FPSO compared with 908 mmscf in 2021. The increase was primarily due to emergency flaring prompted by an increased gas to oil ratio (GOR) beyond the FPSOs reinjection capacity. In mid-2022, Eni Ghana increased its capacity for reinjection of Associated Gas (AG) from 150 mmscf to 260 mmscf (see previous IESC report).

Volumes of AG flared in the first to two quarters of 2023 equate to 2,355mmscf due mainly to maintenance activities, including compressor bundle replacement. There has been no flaring of Non Associated Gas (NAG) in 2023.

Figure 8-1 below shows the effects of flaring on the Project’s total GHG emissions. The effects of non-routine flaring (maintenance) can be seen in the year-to-date column and a revised 2023 forecast that estimates GHG emission of approximately 25tCO<sub>2</sub>eq/kboe [compared to 14.0 tCO<sub>2</sub>eq/kboe in 2021]



**Figure 8-1. Project GHG gas intensity**

Flaring represents a significant proportion of the Project’s total GHG emissions and is therefore a priority focus area for attention. Noteworthy initiatives recently undertaken to reduce the volume of gas flared include:

- Installation of a third HP compressor on the FPSO. The compressor has resulted in a higher gas processing capacity beyond the previous HP compressor rate (allowing more AG export to ORF), thereby reducing the volume of gas needing to be flared. The additional AG exported to the ORF has been sold to third parties.

- Eni Ghana is also exploring the feasibility of a closed loop system that would allow the collection of gas from LP and HP flare systems as an alternative to flaring. The system would be designed to recover up to 3.5mmscf of associated gas during abnormal operating conditions before flaring would be required. If feasibility studies are positive the system could be operational by 2025.

8.4.3 Other measures to reduce GHG emissions

The IESC has reported on various other initiatives to reduce GHG emission in earlier reports. These include: i) a comprehensive programme of leak detection at the ORF and then at the FPSO to reduce fugitives; ii) an energy efficiency audit; iii) use of bicycles at the ORF; iv) installation of photo-voltaic panels at the Bradley Tower; v) elimination of diesel fuel for power generation at the ORF Pilot camp; vi) replacement of light bulbs with energy efficient bulbs on the FPSO (ongoing); energy saving signage.

The afore mentioned fugitive emission campaign was completed for the FPSO in July 2023 (with two leaks detected). Ongoing efforts to reduce energy consumption/reduce GHG emission are expected to materialise as Eni Ghana seeks to achieve ISO 50001 certification, including the use of drones to detect fugitive emissions at the ORF and FPSO.

During the site visit the IESC undertook a walkover inspection of the Pilot Camp and noted communal air-conditioned rooms with windows left open. Consistent with other localised energy saving behaviours, windows should not be open whilst air conditioning units are running. This message needs to be reinforced amongst the residents/users of the accommodation camps.

8.4.4 Stack Emissions

The IESC previously reported on the Company’s plans to commission a Continuous Emissions Monitoring System (CEMS) on the Main Power Generating units however the IESC understands this is no longer the plan.

In the absence of a CEMS, stack emission measurements have been taken by ESL and samples analysed for Sulphur Dioxide (SO<sub>2</sub>), Nitrogen Oxide (NO<sub>x</sub>) & Carbon Monoxide (CO). The most recent results for the three MPGs are shown below.

Sample	Main Power Generator	Main Power Generator	Main Power Generator	Main Power Generator	Main Power Generator	Ghana Standards Point Source Guideline (GS 1236:2019)	IFC/WBG Point Source Emissions Guidelines (2007)
	(MPG 1) June 2023	(MPG 1) Jan 2023	(MPG 2) Dec. 2022	(MPG 1) Sept 2022	(MPG 3) April 2022		
SO <sub>2</sub> (mg/Nm <sup>3</sup> )	<0.01	<0.01	0.80	<0.01	2.71	100	N/A
NO <sub>x</sub> (mg/Nm <sup>3</sup> )	307.02	250.21	306.24	156.99	200.88	320	200
CO (mg/Nm <sup>3</sup> )	1361.59	1296.28	1223.88	884.38	960.96	100	N/A
Temperature of flue gas (°C)	452.0	452.0	456.4	439.3	466	NG	NG

Figure 8-2. Stack emission results 2022/2023 (source: eni slide pack)

The results show significant and consistent exceedance of the national limit CO as prescribed in GS1236:2019. Eni Ghana informed that some process improvements have been made and the effects of these improvements will be clear when Q3, 2023 results are available. However, Eni

Ghana is also of the opinion that the national limit of 100mg/Nm<sup>3</sup> is unachievable for the MPGs, irrespective of process improvement, and that the limit should not be applied to the plant.

The source of the Ghana standard and its applicability to the stack emissions not known, although 100mg/m<sup>3</sup> aligns with the WHO 15-minute AQS Objective, which would not typically be applied to a stack emission. Eni Ghana has informed that emission results for stacks have been shared with the Ghana EPA and there has been no expression of concern from the regulator. Nevertheless, the source of the limit and its applicability/non applicability to the Project should be confirmed. Depending on the outcome of Eni Ghana's investigation, either: i) written confirmation should be provided to Lenders confirming the limit is not applicable, or ii) Eni Ghana should demonstrate it has a derogation for this limit.

The table also shows NO<sub>x</sub> levels are below Ghana standards but exceed the more stringent IFC limit of 200 mg/Nm<sup>3</sup>. Further details are required on the operating parameters of the MPG when measurements are taken, particularly as NO<sub>x</sub> emissions can increase when operating at reduced load, for example, <70% capacity. Thus, operating parameters should be recorded during future sampling periods in order to provide context to the results. The effects of the afore mentioned process improvements may bring the MPG emission back into compliance, however if this is not the case, further investigations into this apparent non-compliant emission will be required.

## 8.5 Noise

Eni Ghana continues to monitor noise levels within the ORF and at nearby receptors. The noise levels measured are comparable with earlier results and continue to exceed IFC daytime (55dB(A)) and night time limits (45dB(A)) for residential areas. These exceedances are most notable the absolute limits for night time at Sanzule cemetery and the village of Anwolakrom. However, as reported previously, the noise levels are comparable with baseline noise levels and therefore considers the noise levels conform with IFC limits<sup>24</sup>. The high baseline is reported to result from waves and other non-project related noises. The IESC's observations during repeated site visits supports this assertion i.e. the Project is not audible at the nearest offsite receptors during normal operations.

## 8.6 Waste management

Eni Ghana retains the two waste management contractors<sup>25</sup> (Zoil for most onshore wastes and ZEAL for waste generated on the FPSO) discussed in previous reports. Given the steady state nature of the Project, and the ongoing use of professional waste contractors, the IESC has no further findings relating to waste management. However, the IESC does acknowledge audits conducted on both of Eni Ghana's waste provides during 2023.

An update on the status of earlier waste related findings is provided in Appendix 4.

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<sup>24</sup> IFC limits allow for up to 3dB incremental increase above background levels.

<sup>25</sup> IESC confirms both waste contractors have valid operating permits in place.

**Table 8-1: Summary of Findings, PS3**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard</b>	<b>IESC Recommendations</b>	<b>Significance</b> (indicative date for completion)
010_9/23	Procurement delays	The IESC was informed that commencement of monitoring campaigns/commissioning of consultants and other services has been delayed whilst approval from GNPC has been sought.	PS3	Given the importance that monitoring campaigns are conducted at specific times of the year to take account of seasonality issues/ensure comparability of different surveys, it is recommended contingency is built into the procurement process.	<b>Minor</b>
011_9/23	Soil erosion/sedimentation	Some localised erosion was observed during the site visit that is likely to have contributed to the high turbidity levels in surface waters	PS3	Efforts should continue to stabilise the isolated areas where reinstatement of vegetation have not been successful.	<b>Minor</b>
012_9/23	Environmental monitoring	No environmental/biodiversity monitoring was undertaken in Q1 2023 because ESL's contract was not renewed in a timely manner. The IESC understands delays associated with approval from GNPC are a factor leading to the delay.	PS3	See recommendation above (010_9/23)	<b>NA</b>
013_9/23	Wastewater effluent	The STPs located at the ORF, Permanent and Pilot camps are not functioning according to measurements taken.	PS3	The reasons for malfunctioning STPs should be investigated and corrective actions undertaken to achieve a compliant effluent.	<b>Minor</b> (within 6 months)
014_9/23	Produced water	Small volumes of produced water are being generated. Equipment on the FPSO is installed to reinject produced water, however the volumes produced are below the minimum required for reinjection. Consequently, the produced water is tested before being discharged to sea.	PS3	Complete engineering works to allow for the reinjection of smaller volumes of produced waters as planned.	<b>Minor</b> (within 6 months)

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Standard</b>	<b>IESC Recommendations</b>	<b>Significance</b> (indicative date for completion)
		Works have been undertaken to modify the reinjection system to allow for smaller volumes of water reinjection.			
015_9/23	Energy efficiency	During the site visit the IESC undertook a walkover inspection of the Pilot Camp and noted communal air-conditioned rooms with windows left open.	PS3	Residents at the pilot (and permanent) camps should be reminded of the need to reduce energy use by closing windows when air conditioning units are running.	<b>Minor</b> (1 month)
016_9/23	Stack emissions (carbon monoxide)	Exceedance of the national limit for CO. Eni Ghana is of the opinion that the 100mg/Nm <sup>3</sup> is unachievable for the MPGs, irrespective of any process improvement, and that the limit is not appropriate for the plant.	PS3	The source of the limit and its applicability to the Project should be confirmed. Depending on the outcome of Eni Ghana's investigation, either: i) written confirmation should be provided to Lenders confirming the limit is not applicable, or ii) Eni Ghana should demonstrate it has a derogation for this limit.	<b>Minor</b> (3 months)
017_9/23	Stack emission (nitrogen oxides)	NOx levels exceed the IFC limit of 200mg/Nm <sup>3</sup> .	PS3	The benefits of the planned process improvements may bring the MPG emission back into compliance, however if this is not the case, further investigations into this apparent non-compliant emission will be required.  Operating parameters can affect NOx emission levels and should be recorded during future sampling periods in order to provide context to the stack emission results.	<b>Moderate</b> (6 months)

**Offshore Cape Three Points**

## **9. PERFORMANCE STANDARD 4: COMMUNITY HEALTH, SAFETY, AND SECURITY**

### **9.1 Introduction**

In this section the IESC's analysis focuses on security matters. Community Health and Safety will be a focus for the next IESC site visit. Topics presented in this section are:

- Status of the Security Management Plan;
- Security provision at the ORF and FPSO;
- Fishery-based incursions into the FPSO exclusion zone; and
- Security related grievances

### **9.2 Status of the Security Management Plan**

The Security Management Plan (SMP) was revised in February 2023 to reflect the finalisation of a Memorandum of Understanding with the Ghana navy. The previous version of the SMP received "sign-off" from the IFC and it is understood any revision should also be shared with IFC, however, at the time of the site visit IFC did not believe the revised February 2023 version had been shared.

#### **9.2.1 Risk Assessment Matrix**

The measures put in place, as described in the SMP, are based on a Security Risk Assessment Matrix that should be updated annually or when threats change/emerge. Eni Ghana Security Manager informed that the security landscape and threats to Eni Ghana assets have not changed significantly in recent years. Reportedly, political demonstrations have taken place (August 2023) but these have occurred in major cities with no targeting of Eni Ghana assets. Security threats are monitored on a continuous basis through sharing of information with Regional Security Advisors (weekly updates) and exchanges with local security agencies.

The IESC agrees that the SMP needs to be underpinned by a current risk assessment. With this in mind, the following observations are made:

- the Risk matrix in the latest version of the SMP (Feb. 2023) makes reference to discussion regarding finalisation of a MoU with the Navy. Given that the MoU was agreed in 2022 this text would appear to be now superseded.
- The Risk Matrix is organised by location. However, it does not appear to consider emerging events/threats, for example upcoming elections. Eni Ghana informed that there had been no increased threat to Eni Assets during previous elections, but nevertheless it is recommended that such events are considered and included in the risk matrix.
- The SMP, and risk matrix therein, should be updated at least once a year (or more frequently in the event of a significant change). Dates on previous SMPs would suggest the SMP is not necessarily reviewed, updated where necessary, and reissued on an annual basis.
- Eni Ghana should consider inclusion of a security threat as part of its future emergency response exercise scenarios to test communications with security agencies. This recommendation is a repeat on an earlier recommendation – see Appendix 4, Issue ref. 023\_09/22.



## Offshore Cape Three Points

### 9.3 Security provision at the ORF and FPSO

A Memorandum of Understanding (MoU), agreed with the Ghana Navy in 2022, remains in place. The MoU makes clear reference to adherence to the Voluntary Principles on Security and Human Rights and also the UN Basic Principles for Use of Force and Firearms.

The IESC has previously recommended similar MoU's be established with other governmental security forces, however Eni Ghana informed that there are established communications with these organisations and each year a national security response exercise is conducted involving national security providers. Consequently, Eni Ghana does not see any need to formalise arrangements with other security providers via a MoU.

The onshore facilities are considered to be of national strategic assets and therefore are provided with a permanent armed police presence (as reported previously). There is also a military detachment deployed nearby that Eni Ghana can call upon if a threat to the ORF exists.

The private security provider G7 continues to provide non armed security services for all of Eni Ghana's onshore facilities.

### 9.4 Fishing vessel incursions

Eni Ghana has reported zero incursions in 2023 to date following agreement with the Navy to patrol and intercept fishing vessels entering the FPSO exclusion zone. The naval presence appears to be a strong deterrent with no interventions required other than on occasions when fishing vessels have run into difficulties/loss of power and drifted into the exclusion zone.

Eni Ghana continues to maintain a presence on the naval vessel and reports daily basis. The IESC understands there have been no arrests or firing of warning shots.

### 9.5 Security related grievances

A review of grievances does not reveal any open security related grievances in 2023 year to date.

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**Table 9-1: Summary of Findings, PS4**

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
018_09/23	Security risk assessment	<p>Up to date Security Risk Assessments are critical to the SMP and risks should be frequently reviewed and the SMP updated accordingly.</p> <p>The risk matrix in the latest version of the SMP makes reference to discussion regarding finalisation of a MoU with the Navy. Given that the MoU was agreed in 2022 this text would appear to be now superseded.</p> <p>The risk matrix is organised by facility location. However, it does not appear to consider emerging events/threats, for example upcoming elections/protests. Such events should be considered and documented in the risk matrix.</p>	PS4	<p>The SMP should be updated to:</p> <ul style="list-style-type: none"> <li>• reflect current status of the Navy MoU; and</li> <li>• consider emerging events/threats in the risk matrix</li> </ul> <p>The SMP updates, scheduled to occur annually (or more frequently in the event of a significant change) should be documented.</p>	<p><b>Moderate</b> (within 3 months)</p>

## 10. PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

### 10.1 Completion of Livelihood Restoration Plan

The timeframes for completion of the LRP were extended by the Project in order to provide additional support to those PAPs who had not been able to re-establish their livelihoods within the original planned timescales. However, the Project has now completed the delivery of support provided under the Livelihood Restoration Plan (LRP) for the land-based economic displacement, including the Asset Compensation, Financial Management Training, Transitional Support Full Food Aid and Support Service components.

TechnoServe, as the implementation company for the LRP, has completed an updated 'endline' survey, which used a questionnaire administered with the LRP Project Affected People (PAPs) to collect income and other socio-economic data. This is designed to help make comparisons with the baseline situation for these PAPs. The endline report was completed in December 2022, and will be available for the consultants doing the LRP completion audit.

The LRP completion audit is being prepared by HPC, an Italian consulting company, and their local partners and a report is due to be completed in October 2023. HPC and their local partners conducted a sample-based survey of PAPs to collect data on livelihood status and outcomes of the LRP support, and also undertook key informant interviews and focus group discussions.

As noted in the last IESC monitoring report, the LRP PAPs – along with all other households in Ghana - will have been impacted to some extent by economic challenges created by COVID-19 and by the recent high inflation levels in Ghana. These economic challenges will have made it harder for the Project to restore livelihoods to baseline levels, particularly when inflation is taken into account. It will be important for the LRP Completion Audit to consider the extent to which these external factors have impacted on the restoration of livelihoods. Additionally, for those 38 LRP PAPs who were also EDGE beneficiaries, the LRP Completion Audit should consider the contribution of the LRP in restoring their livelihoods, separate to the additional benefit generated by the EDGE support. The livelihood status of vulnerable persons and the impact of vulnerability on livelihood restoration should also be clearly state in the LRP Completion Audit.

The LRP completion audit is a vital part of the delivery of the LRP, and the IESC recommends that it is carefully reviewed by Eni Ghana and IFC, with support from the IESC as applicable, before it is finalised and the LRP then be considered as completed.

### 10.2 Meeting with LRP Working Group

During the site visit, the IESC along with Eni Ghana representatives conducted a meeting with community members of the LRP Working Group. The meeting was used by the IESC to gather information about the role of the LRP Working Group and feedback on the LRP implementation process. This follows a similar meeting conducted with the LRP Working Group during the IESC site visit in September 2022.

The LRP Working Group members described their ongoing role in engaging with the LRP PAPs on their livelihood activities. This work is being undertaken by the LRP Working Group as leaders in the community, and will continue outside of the LRP implementation process once it is completed. The LRP Working Group members provided positive feedback on the livelihood restoration that had been achieved for the majority of LRP PAPs, with many of the LRP PAPs now having a better standard of living than those who were not PAPs. They did, however, note that some PAPs with larger numbers of people in their households have had challenges, and also that there have been broader economic challenges in Ghana. The LRP completion audit consultants (HPC) met with the LRP Working Group as part of their data collection process.

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As reported in the last IESC monitoring report, the IESC notes the ongoing and valuable role that the LRP Working Group appears to have in supporting the LRP PAPs.

**10.3 Fisheries management**

As noted in the last IESC monitoring report, the impact management related to fisheries is generally completed, with the original disturbance allowances fully paid, incursions into the FPSO area now dropped to zero, and there being no requirement for ongoing monitoring of fish catch or fishery-related activities. Eni Ghana are continuing to engage with the Fisheries Management Coordination Committee, and the IESC notes that this remains as an important mechanism to hear about any issues of concern that arise on an ongoing basis. Additionally, Eni Ghana are developing three sheds at three landing beaches (Sanzule, Krisan and Eikwe) to help support the local fishing communities.

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Table 10-1: Summary of Findings, PS5

ID	Aspect	Issue Description	Standard	IESC Recommendation	Significance (indicative date for completion)
019_09/23	LRP Completion Audit	The LRP completion audit is a vital part of the delivery of the LRP and is due to be completed with a report issued by the consultants in October 2023.	PS5	<p>The LRP Completion Audit to be carefully reviewed by Eni Ghana and IFC, with support from the IESC as applicable, before it is finalised and the LRP then be considered as completed.</p> <p>The Completion Audit should acknowledge the impact that economic challenges arising from COVID-19 and inflation will have had on livelihoods, and if livelihoods have not been restored due to these external factors, that recommendations for any further support measures are made based on the Project's responsibilities in line with PS5. Additionally, for those LRP PAPs who were also EDGE beneficiaries, the LRP Completion Audit should consider the contribution of the LRP in restoring their livelihoods, separate to the impact of EDGE support. The livelihood status of vulnerable persons and the impact of vulnerability on livelihood restoration should also be clearly stated.</p>	<p><b>Moderate</b></p> <p>(end December 2023)</p>

# 11. PERFORMANCE STANDARD 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

## 11.1 Introduction

The IESC chaired a meeting relating to the management of biodiversity aspects in the reporting period, involving the following parties in addition to Eni Ghana: ESL Consulting (ESL), Eni HQ<sup>26</sup>. In addition, the site walkover included inspection of the ORF, plant nursery, reinstatement areas and areas previously noted to be at risk from erosion and drainage issues during the previous site walkovers to gauge progress.

This chapter presents the findings of the IESC monitoring in relation to biodiversity elements, including revisiting findings of the previous site visit and desk-based audit, with updates provided as appropriate. The chapter focuses on:

- Sea Turtle Biodiversity Action Plan (BAP);
- Avian BAP;
- Natural Habitat No Net Loss Implementation Plan (NNLIP);
- Vegetation reinstatement and recovery;
- Site drainage and erosion control; and
- Marine monitoring.

The status of previously identified issues is also reviewed in Appendix 4 and summarised below:

- 1) Working towards the improvement of the communication between the biodiversity and social teams was recommended in relation to the Bakanta beach road upgrade; and conducting a retrospective assessment of the level of impact and confirmation that the Bakanta road upgrade works have not compromised the Sea Turtle BAP, with identification of suitable mitigation/ compensation measures should a significant residual effect be identified. In response to the recommendations Eni Ghana has provided evidence of communications between the biodiversity and SLC team being conducted where there are competing objectives, however, there has been no assessment of impacts to date. An additional concern has been identified relating to the lighting levels resulting from the construction of a community school at Bakanta and their potential effects on sea turtles, which could have been mitigated at the design stage if effective communication between the teams had taken place.
- 2) When the Avian BAP was finalised in 2020 it was noted that insufficient data was available for a warning threshold to be set for sanderling density, which should have been developed on completion of the 20/21 monitoring period, but this was not achieved. The presentation on shorebirds to the IESC during the monitoring visit indicated that the sanderling warning threshold is taken to be the same as the BAP target (12.3/km), and this has been confirmed by the Project team. Whilst the Project team consider it likely that the abundance of sanderlings on the shoreline is not influenced by Project activities, should the target be exceeded, Eni Ghana has indicated that it will reconfirm if any Project activity that could have influenced the survey results was undertaken during the relevant period.
- 3) The recommendation to identify an alternative Additional Conservation Action (ACA) to replace the intended collaboration with CAW after it ceased to operate was previously made by the IESC. Also, it was recommended to share the monitoring results with the

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<sup>26</sup> Eni HQ is supported by Flora and Fauna International

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wider scientific community/ the Global Biodiversity Information Facility (GBIF) to improve regional conservation efforts. Eni has indicated that data sharing with local academic institutions has been discussed, however no formal protocol for this has yet been established. The appropriate route for data sharing with GBIF has also yet to be established. A formalised replacement ACA for the intended collaboration with CAW remains outstanding, and should be agreed prior to the next monitoring visit, particularly as another action (the installation of the large information board at Amansuri Estuary) has been decommissioned due to weather damage. The IESC does, however, appreciate that the beach clean-up and plastic waste recycling initiatives, which are other ACAs listed in the Avian BAP, are ongoing and being implemented successfully (see Section 0).

- 4) A plan for the eradication of the invasive species *Imperata cylindrica* has been prepared and is due for imminent implementation.
- 5) It appears that the IESC's earlier recommendation to develop a long-term budget forecast (10-20 years) for the NNLIP is still outstanding with no progress reported.
- 6) In the previous monitoring report, the IESC recommended that the experts who revealed the elevated levels of barium during the monitoring of sediment and water quality around the FPSO should be consulted to flag any recommendations for further monitoring of marine biota, e.g., given the bioaccumulation of metals in the food chain it may be worth acquiring some of the catch from local fishermen to test fish tissue for the metals that appear to be present at increasing concentrations around the FPSO. Based on the 2023 Q2 QMR, the IESC understands that Eni Ghana has approached a contractor to conduct bioaccumulation testing of fish and is currently finalizing the contract. This is overall a positive development; however, the action will remain outstanding until evidence of the aquatic biota monitoring inclusion into the overarching monitoring programme is available. Sampling should be representative of actual fishing practices and proximity to FPSO (areas with elevated metal concentrations) should be known.
- 7) The IESC previously raised that no verification of staff training, including attendance lists and staff training records, was provided in the QMR and AMR reporting, making it difficult to track training-related targets as stated in the Biodiversity Action Plans (BAPs). The IESC further notes that attendance lists from two training events related to biodiversity (MM training and snake handling) have been provided followed by a copy of the presentation on the latter. In addition to this, an attendance sheet from a kick-off meeting for a new contractor which *inter alia* covered relevant BAP aspects, has been provided. No transcript of this training session was however made available for review. Overall, although some progress has been achieved here, only one training transcript has been provided for review to allow the content of that training to be verified against the requirements of the BAP. Future reporting should include example transcripts for all training given.
- 8) Although it was verbally confirmed by ESL during the monitoring visit that staff induction training material now includes specific information on the key bird species of interest in the vicinity of the Project site, to follow-up on the previous action raised by the IESC to add specific information in this regard, no updated induction training transcript has been provided.
- 9) The IESC previously recommended updating the MMSTPPP to ensure adequate mitigations have been taken to prevent adverse impacts on marine mammals and turtles potentially arising during the operational phase (scheduling of noisy works to avoid key sensitive periods for marine mammals and sea turtles and the briefing of any new vessels, including drill ships, coming to site on the requirements of the MMSTPPP, including the delivery of specific training on the importance of maintaining distance and

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using dedicated navigation channels where applicable. Records should also be kept of dedicated watches prior to new noisy works such as drilling events). Since there were no watches reported in the monitoring period, the IESC assumes that no noisy works took place (it is recognised that no drilling has taken place in the reporting period), though marine mammal training was conducted for specific personnel during the reporting period. The MMSTPPP still requires updating as previously recommended to account for future noisy works and drilling in particular.

**11.2 Sea Turtle BAP**

The Sea Turtle BAP has continued to be implemented throughout the reporting period, with details on specific aspects provided below. The full season of sea turtle observations for the reporting period is based on the BAP survey schedule and encompasses the period from August 2022 to February 2023.

**11.2.1 Monitoring**

Sea Turtle surveys were conducted in accordance with the BAP schedule. Nesting activity by Olive Ridley was recorded, while green turtle was recorded in by-catch records only. No leatherback turtles were recorded. A slight decrease in nesting activity was noted compared to the previous year, and the BAP target for maintaining effort per nesting observation compared to the baseline has not quite been met (6.7 survey days required per observation for this period when compared to the BAP target of 5.7 day per observation); however, this is still below the warning threshold of 7.5 days per observation. It is noted that this result appears to have been misinterpreted in the reporting as an exceedance of the target; however, 6.7 days of observation being required per observation vs 5.7 indicates an increase in the effort required to detect a nest and therefore suggests a decrease in nesting activity. The overall nesting success, however, exceeded the BAP target (78% vs 53% nesting success).

There continues to be no nesting activity in the high impact zone<sup>27</sup>, which according to the report could be attributed to the change in sand density and sediment characteristics, or the presence of the Anwolakrom community potentially causing disturbance to the turtles.

As reported in the End of Season Sea Turtle Report produced in July 2023, and as relayed in the sea turtle monitoring presentation to the IESC during the site visit, threats observed throughout the 2022/2023 monitoring period included poaching of turtles by community members, egg collection, light pollution, beach sand mining and fishery by-catch. Overall, the BAP target to keep the poaching at the baseline level or below (19%) was not met for the reporting period (22.7%). Considering this and the overall low willingness of the local fishermen to release turtles which destroy their nets, as noted in the End of Season report, the IESC agrees with the recommendation in the End of Season Report to explore further opportunities to decrease intentional harm to turtles, including the provision of nets to compensate for those damaged by turtles; though the IESC recommends that such measures would need to be managed carefully to minimise the chance of the system being abused by fishermen.

The assessment of the light disturbance revealed an overall 60% increase in artificial light and a 120% increase in Rank-3 light (the most harmful type of light for turtles) in comparison with the 2016 baseline and is related to the community school construction by the Project at Bakanta. This is overall significantly above the BAP warning threshold (25% increase). The Project should further work internally and with the community to find a solution to address the increased light disturbance issue, and if identified at the design stage this issue could have been prevented. The recommendation in the previous monitoring report to improve communication between the social and biodiversity teams does not appear to have been implemented in this instance, therefore the IESC recommends that a formalised communication protocol / checklist is developed, to be

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<sup>27</sup> The area of beach 300m either side of the GES landfall



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implemented prior to any further community construction activity by the Project, to ensure that conflicting issues are identified and addressed properly.

A habitat assessment was conducted by ESL along the nesting beach in November 2022, including an assessment of erosion, disturbance and pollution. The results of the assessment reported that the beach was found to have a generally gentle slope, allowing turtles to access the back beach which appeared to be overall suitable for nesting, in line with the findings from previous years.

The End of Season Report recommended conducting continuous year-round night patrols to monitor the nests that were laid during the survey period but hatched outside of it, since this could be beneficial for both olive ridleys nesting year-round and green turtles which have previously been reported to nest in June-July, outside of the current monitoring period. Whilst the IESC can see the value of increasing the temporal scope of the survey, this would impact the comparability of data with previous years monitoring results and is not regarded as a requirement by the IESC.

### 11.2.2 Hatcheries and Back Beach Habitat

#### *Temporary road upgrade at Bakanta*

The IESC previously reported on the strengthening of the road to Bakanta located along the back beach to allow for heavy vehicles to access the school during its construction (under the LDPj-CIS Education Schools programme). A number of concerns were raised in the previous report as follows:

- Reduction in the width of the back beach, increased volume of traffic and compaction potentially limiting its suitability for use by nesting turtles; and
- Limited interaction between SLC and biodiversity focussed teams.

The IESC recommended that a retrospective assessment of the likely effect of the road upgrade on the beach habitat and nesting turtles be undertaken, with additional mitigation identified to achieve no net loss of habitat and implementation of this mitigation if necessary. In response to the recommendations Eni Ghana has provided evidence of communications between the biodiversity and SLC team members where there are competing objectives (item SN12, in 'ESAP Compliance and IESC Open Issues' section of Q2, 2022 QMR) however there has been no assessment of impacts to date.

#### *Permanent Road (Bakanta)*

The IESC has been made aware of a request from Bakanta community for a new/upgraded road to replace the current back beach road (see Section 6.9). Historically two routes have been under consideration, one would entail an upgrade of the current back beach road and the second would follow the route of an existing but overgrown track following the route of a transmission line approximately 250 meters from the beach. Whereas a final decision to construct the road has not been taken, Eni Ghana has confirmed that the beach road option has been dismissed thus preventing further road-induced impact to turtle habitat along the beach.

For the second route option, engineering feasibility studies have been initiated that will subsequently inform a final decision on the road's construction. In the event engineering studies confirm the feasibility of the road and a final decision is made to proceed with construction, Eni Ghana will then commission an ESIA on a voluntary basis.

The IESC notes the proposed sequential order of the engineering and environmental studies and recommends these studies run in parallel/there is a significant period off overlap between the

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engineering and environmental studies such that the environmental studies/stakeholder inputs can influence the design/river crossing technique/micro alignment road etc. as per good practice.

Eni Ghana should also consider reinstatement of the beach road to its earlier condition to discourage its use and support in its efforts to improve turtle nesting habitat/impact to the BAP No Net Loss target. Any reinstatement would have to take place once the new road is complete and with the consent of the community, recognising that they may want to retain the beach road in its current state.

*Eikwe hatchery relocation and early nest inventories*

The three hatcheries which had been in place in Eikwe, Krisan and Bakanta have been previously used successfully to relocate the nests exposed to poaching or inundation or soil erosion. The End of Season report for 2023/2022 reports that the Eikwe hatchery had to be dismantled and relocated due to a beach resort development (Figure 11-1). It is further understood based on photographs provided in the presentation, that an assessment of the site for the new hatchery to evaluate its suitability for turtle nesting has been conducted and the hatchery successfully relocated before the nesting period started.

The End of Season report also notes that the Bakanta hatchery was used to relocate and incubate four olive ridley nests. Whilst hatching success was high and compatible with the *in situ* nests (70.2% hatchery vs 81.7% *in-situ*), the emergence success was much lower (5.7% hatchery vs. 21.4% *in situ*). It was concluded that this could be associated with the inventories conducted by the patrol team being conducted too early in the season. Although the presence of hatchling tracks on the nest indicates hatching and emergence, some hatchlings can emerge earlier than others; and the patrol team seeing such crawls conducted inventories and subsequently removed the remaining hatchlings, resulting in a low emergence success which could have been higher had the hatchlings been left to emerge naturally. Follow-up training has been provided to the team to ensure no further early inventories take place. The IESC further recommends that refresher training is provided to the patrol team every year prior to the start of the monitoring season.



**Figure 11-1: Eikwe hatchery impacted by the resort development.**

### 11.2.3 Plastic Waste Recycling Initiative

The End of Season Sea Turtle Report produced in July 2023 reported on the waste recycling campaign, which has continued across all five communities. Photographs of plastic waste initiatives were included in the Q2, 2022 QMR, including a People and Plastic Health Walk (6<sup>th</sup>-10<sup>th</sup> February 2023) and a beach clean on 7<sup>th</sup> June 2023 (Figure 11-2). This event was aimed at improving sanitation within the communities and along nesting beaches.

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**Figure 11-2: People and Plastic and Beach Clean Events**

#### 11.2.4 Community Education and Awareness: Sea Turtles

The End of Season Sea Turtle Report advised on the turtle-related community awareness activities that have been performed during the reporting period, which engaged a total of 80 participants (school children) from two schools (Anokyi and Atuabo) in October 2022. This is slightly below the BAP target of 95 participants per year. The report further made a recommendation to continue the awareness campaign on a more regular basis to sustain the interest and support of local communities in sea turtle conservation and consider expanding the educational programme to include different means of engagement such as role plays or quizzes. The IESC endorses this recommendation.

### 11.3 Avian BAP

The Avian BAP has continued to be implemented throughout the reporting period, with details on specific aspects provided below.

#### 11.3.1 Shorebird Monitoring

Monthly shorebird monitoring continues to be implemented; however, for the current reporting period the monitoring covered only March 2022 to February 2023 and missed the months of March and April 2023 (this is at odds with the BAP schedule which stipulates monitoring in peak season September to April; and low season May to August). The reason for this discrepancy is understood to be the lack of a contractual agreement being in place to conduct the surveys in March and April. The IESC therefore recommends that a time is scheduled for review of the contract in future so that such a situation does not occur again (see also 010\_ 9/23).

Monitoring was conducted both at the beach transect at Sanzule and at the Amansuri Estuary, as outlined during the avifauna monitoring presentation to the IESC during the site visit, when graphs summarising the results for the reporting period were presented. An End of Season Shorebird Report was also submitted to the IESC for review and provides a suitable level detail and analysis of the results for the reporting period. The main threats to shorebirds in the area continue to be disturbance from fishermen, fishing and fishing-related activities, as outlined during the presentation to the IESC and reported in the End of Season shorebird report, though the average level of disturbance (number of disturbances per km) has been reported as lower than in previous reporting periods.

Counts were consistent with previous monitoring results, with sanderling counts being the most numerous. Peak sanderling numbers for the reporting period occurred in August at the beach transect locations and September for the Amansuri estuary, which is broadly in line with the previous reporting period. No royal terns were recorded along the beach transects during the

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period, though a total of 602 were recorded in the Amansuri estuary area. These results are consistent with previous monitoring years.

Counts at the Sanzule transect remain low compared to the 2015/16 baseline, though as previously acknowledged, the original baseline count could have been anomalous since it was a single data collection event. Nonetheless, statistical analysis shows a significant difference between the construction and post-construction periods, providing evidence to support a temporary impact which has since recovered with the rehabilitation of the beach front in front of the ORF, with an increase in mean observations from 32 to 72 individuals. Observed sanderling density for the reporting period (21.6/km) has exceeded the BAP target (12.3/km).

**11.3.2 Additional Conservation Actions for Shorebirds**

Relating to Additional Conservation Actions (ACA), the large avian information board which was refurbished at the Amansuri Estuary in 2021 was dismantled due to rust and falling parts, as reported in the End of Season Avian monitoring report and there do not appear to be any plans to replace it.

In relation to the previously planned collaboration between ESL and the Centre for African Wetlands (CAW) to build a more comprehensive understanding of bird movement in the region as a whole, as reported previously this will no longer be possible since CAW has ceased to operate<sup>28</sup>. However, as reported in the 2021 AMR and during the IESC site visit, the Project team started conducting comparative monitoring at the Ankobra estuary to collect contextual information to better understand the variation in bird numbers including factors such as seasonality, localised migration between sites and disturbance mainly from anthropogenic sources. The End of Season Shorebird Report 2022/21 contained the raw data from the observations at the Ankobra Estuary with no further analysis on the results obtained. The IESC has previously recommended that this activity be further explored as a potential replacement ACA in place of the collaboration with CAW, and that this continues to be reported and analysed in the End of Season reporting to assess if the variability in sanderling and royal tern numbers at the primary survey area could be attributed to these species moving between the Amansuri and Ankobra estuaries. However, the End of Season Report 2023/22 continued to present only raw data for Ankobra with no apparent attempt to analyse the results.

Overall, the End of Season 2023/22 Report acknowledges that no additional conservation activities have been taking place in the reporting period. The IESC recommends that this is resolved prior to the next monitoring visit.

**11.3.3 Hooded Vulture Monitoring**

Hooded vulture surveys continue to be conducted in June and November in accordance with the schedule set out in the Avian BAP, and due to the scheduling of the IESC monitoring period the reporting period for vultures presented covers the June and November 2022 monitoring window. An End of Season Vulture Report was provided to the IESC for review and a summary of the results was provided as part of the presentation to the IESC during the monitoring visit. Overall, the number of hooded vultures was significantly higher in 2022 (112 specimens) than in 2021 (47 specimens). During the 2022 reporting period there was an observed increase in hooded vulture numbers across the overall area surveyed compared to the previous reporting period, despite recorded numbers for some individual locations being fewer than baseline and 2021-2020 numbers. The greatest numbers of roosting and foraging hooded vultures were recorded at Eikwe with average peak season numbers more than doubled in comparison with 2021 results (and 7.4 times more than the baseline). Similar results were obtained from Esiana, with 2022 results much higher than 2021 (5.8 times) and the baseline (3.2 times). In contrast, the number of hooded vultures continued to decline at Ngalekyi (2.5 times less in comparison with 2021 and 6.2

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<sup>28</sup> Email communication from ESL.

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in comparison with the baseline). However, this is attributed to the closure of a piggery which was previously present there. Despite fluctuations in numbers at individual locations, the number of hooded vultures in the area as a whole remains well in excess of the baseline counts and given the change in the location of foraging activities with time it is considered reasonable to expect some changes in numbers at individual locations from year to year.

The End of Season report states that most hooded vultures utilise piggeries and refuse dumps as feeding areas and coconut trees as roosting habitats. Threats to vultures reported in the End of Season report include coastal development that results in the clearance of coconut plantations, which diminishes available roosting habitat. Other factors which could negatively influence the vulture populations include an overall increase in the level of sanitation among the local communities resulting in the removal of dump sites as well as intentional poisoning, bushmeat and traditional medicine hunting. No disturbance arising from the Project activities has been identified. In keeping with the results of previous surveys, vulture abundance was noted to be higher in June than November.

#### 11.3.4 Community Awareness: Vultures

Community awareness campaigns against vulture persecution are reported in the End of Season report and took place in May 2022, although it has been noted that only a few community members seemed to be aware of the importance of vultures based on the community interviews undertaken, suggesting that the positive effect of community awareness campaigns reported for the previous monitoring period does not appear to have lasted. The End of Season report makes a recommendation to hold further awareness campaigns to tackle this. The IESC notes that there is an existing BAP target for community awareness campaigns, and this should be adhered to going forward. Another recommendation presented in the End of Season report includes working with the local community to develop a solution to prevent vultures from entering piggeries and therefore help prevent targeted poisoning of the birds by farmers; however, it was understood from the previous monitoring visit that the enclosure of piggery areas during the birth of piglets to prevent vulture access was already occurring, therefore no further action may be warranted in this regard.

#### 11.3.5 Forest Bird Monitoring

Forest bird monitoring continues to be ongoing in June (wet season) and December (dry season) in accordance with the Avian BAP, though due to the scheduling of the IESC monitoring period, the reporting period for forest birds presented covers the June and December 2022 monitoring window. The End of Season Forest Bird report was provided to the IESC for review and a summary of the results provided as part of the presentation to the IESC during the monitoring visit. During the monitoring period, both the total counts and species numbers recorded were higher in December than June, which is consistent with results from previous years, likely due to more favourable weather conditions and food availability in December. The End of Season report and site visit presentation to the IESC reported no correlation between bird species richness/abundance and human activity, suggesting that the birds are habituated to the presence of humans.

Overall, the abundance and species richness recorded in 2022 was slightly higher than in 2021 for both June and December. This has been mainly attributed to the abandonment of individual farms, increasing the overall habitat suitability of the area for birds; however, the habitat restoration activities being undertaken by the Project may also be a factor, through enhancement of the quality of available habitat for birds. No species of conservation importance were reported, though previous records of species of conservation concern have been at very low numbers (three non-breeding individuals of the Near Threatened copper-tailed starling in 2020), therefore although one of the targets of the No Net Loss Implementation Plan (see Section 11.5, to observe one or more priority species during annual monitoring) has not been met, this is at



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the very early stages of implementation and the absence of a priority species record at this stage is not considered to be of concern.

**11.3.6 Community Awareness: Forest Birds**

No community awareness meetings have been reported for forest birds, therefore the BAP target to cover 75 community members by the awareness campaign has not been met. Additionally, it is not clear if the 100% employee awareness induction has been met in 2022/23. It is understood that further community awareness raising is planned as part of Natural Habitat>NNLIP (see Section 11.5), which will also be relevant to forest birds, therefore the IESC expects such awareness raising to be dovetailed with that plan going forward with the aim of meeting the BAP target in future.

**11.4 Staff Training**

There is no indication in the QMRs or other reporting that biodiversity training has taken place as part of staff inductions; however, it is understood from the 2023 Q1 QMR that marine mammal training was conducted for FPSO personnel on the 31<sup>st</sup> of January 2023 for 15 crew members, though no full training transcript was provided to verify the content of this training. In addition to this, awareness training on snake identification and management actions to prevent and address bites by venomous snakes was conducted in August 2023 for Eni Ghana's staff and contractors. A copy of the presentation, the content of which overall appears appropriate, and the attendance sheet have been provided to the IESC. However, the evidence of the biodiversity coaching conducted for the personnel is limited to these two training events.

No training is reported in the QMR or other reports relating to the training of local community members involved in beach patrols for sea turtles, though the required frequency of this as stated in the Training Requirements section of the Sea Turtle BAP is that this be conducted on a seasonal basis. This was recognised as a recommendation in the presentation provided by ESL to the IESC and should be taking place in accordance with the schedule stated in the BAP.

The IESC recommends that in future full transcripts and attendance records are kept for each training session held, with the correct date of the training session clearly shown on both the transcript and the attendance sheets, and that these are clearly reported in the QMRs (or AMR) and provided to the IESC for review.

During the site visit, the IESC noted that staff have been encouraging the presence of feral cats at the ORF accommodation camps (see Appendix 5, Photo 15). The IESC recommends that this practice is discouraged and information on this added to staff training material, as this will encourage the feral cats in the area to multiply and poses a risk wildlife, including the bird population in particular.

**11.5 Natural Habitat No Net Loss Implementation Plan (>NNLIP)**

A PowerPoint update on the>NNLIP, prepared by Eni Ghana and Eni HQ was presented to the IESC during the monitoring visit. This update reported that 60 artificial nest boxes of different designs have now been installed for Passeriformes bird species in the Enhancement Zone, considering specific species nesting requirements. Monitoring to assess the utilisation rate of these boxes by birds is scheduled for 2023 (wet season) and 2024 (dry season).

Replanting activities, invasive species management and information signs to discourage cattle herding have been undertaken in the Restoration Zone in the reporting period, as presented to the IESC during the PowerPoint update. Such measures appear to be being effective, as a steady increase in Leaf Area Index and Enhanced Vegetation Index have been reported in both Modified and Natural habitat areas in the zone in comparison with the baseline and the previous reporting period; as well as an increase in the richness and abundance of forest-dependent bird species when compared with the previous monitoring period results and the baseline.

**Offshore Cape Three Points****11.5.1 Community Awareness:>NNLIP**

The 2022 AMR reports stakeholder engagement on the>NNLIP in July 2023, involving the chiefs and elders of Sanzule, Eikwe and Krisan Traditional Authorities. The issues discussed included the preservation of specific tree species planted to revegetate the area and the encroachment on the Eni Concession.

**11.6 Vegetation Reinstatement and Alien Invasive Species (AIS)**

Based on the PowerPoint update on the>NNLIP and the Hazardous Risk Assessment file for the weeding works in August 2023, the IESC understands that revegetation and AIS management is ongoing, with a focus on AIS control for the reporting period. Of the four AIS present on site, three are now under control, and a copy of a Toolbox Talk checklist and attendance sheet for AIS was provided for IESC review for a control campaign at the Consar laydown. The fourth species, *Imperata cylindrica*, will be subject to a further campaign of manual uprooting and herbicide treatment as this species continues to be problematic at the Consar laydown, Temporary Construction Facilities and frontage of the office accommodation despite previous manual removal and incineration. The planned further campaign is in line with the IESC's previous recommendation to considering the application of herbicide as part of an integrated control plan to remove the species and prevent its further spread.

**11.7 Site Drainage and Erosion Control**

The Q2 2023 QMR reports that the Sanzule Community filed a complaint in May 2023 regarding a flooding incident around areas bordering Seh Swamp potentially due to a blocked drain at the ORF waterway (see also Section 6.8). This could imply disruption to the hydrological balance due to inadequate maintenance or sizing / design of drainage structures, though equally may simply be as a result of the exceptional rains across the region at that time. The IESC understands that the Project is currently looking to address the issue and will be providing the update to the IESC in the next reporting round. The IESC recommends Eni Ghana continues to investigate the causes of the flooding incident, inspects drainage channels for blockages and closely monitors drainage capacity/performance in proximity to the ORF during future heavy rain events.

**11.8 Marine Monitoring**

As indicated in Section 11.4, it is understood from the 2023 Q1 QMR that marine mammal training was conducted for FPSO personnel on the 31<sup>st</sup> of January 2023 for 15 crew members, though no full training transcript was provided to verify the content of this training.

It is understood that no additional noise-generating operations (e.g. drilling) were conducted in the reporting period; therefore no results of dedicated marine mammal watches have been reported for the monitoring period.

No incidental sightings of marine mammals or sea turtles during offshore operations are reported in the QMR reporting; in addition, turtle bycatch by fishermen is reported to remain an ongoing issue, as reported in Section 11.2.1. The IESC recommends that the training on marine mammals should include encouragement of staff to report incidental observations, as has taken place in the past, and this training should include support vessel staff (if not already the case), since they are most likely to observe marine mammals during their day-to-day activities.

## Offshore Cape Three Points

Table 11-1: Summary of Findings, PS6

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance (indicative date for completion)
020_ 09/23	Sea turtle poaching	The BAP target to keep sea turtle poaching at the baseline level or below (19%) was not met for the reporting period (22.7%, which is above the 20% warning threshold stated in the BAP and therefore requires a review of drivers for this exceedance and options available for further intervention).	PS6	Considering the overall high degree of poaching including the poor willingness of the local fishers to release turtles which destroy their nets noted by the End of Season report, the IESC recommends exploring further opportunities to decrease the poaching and the provision of nets to compensate for the damaged ones as recommended by the End of the Season Report. Such compensation measures would need to be managed carefully to minimise the chance of the approach being abused by fishermen.	<b>Moderate</b> (within 6 months)
021_ 09/23	Increase in light disturbance for sea turtles including Rank-3	The assessment of the light disturbance revealed an overall 60% increase in artificial light and a % increase in Rank-3 light (the most harmful type of light for turtles) in comparison with the 2016 baseline and is related to the community school construction by the Project at Bakanta. This is overall significantly above the BAP warning threshold (25% increase). Since the majority of the new sources of light disturbance including the Rank-3 arose from the newly constructed community school by Eni at Bakanta, this again similar to the communication issue on the Bakanta beach road upgrade raised by the IESC in the previous monitoring report, brings up an issue of poor communication	PS6	The Project should further work internally and with the community to find a solution to address the increased light disturbance issue.  Develop a formal communication protocol or a checklist to be regularly fulfilled by the social and biodiversity teams to ensure conflicting issues are identified and addressed properly.	<b>Moderate</b> (within 6 months)



**Offshore Cape Three Points**

		between the biodiversity and social teams of the Project and should be addressed accordingly.			
022_09/23	Refresher training for the sea turtle patrol team	The emergence success at the hatchery was low which could be associated with the inventories conducted too early in the season by the patrol team.	PS6	Refresher training should be provided to the patrol team every year prior to the start of the monitoring season. Evidence of the inclusion of the refresher training into the overarching training and awareness annual calendar should be provided.	<b>Minor</b> (within 12 months)

**APPENDIX 1**  
**ENVIRONMENTAL AND SOCIAL ACTION PLAN**

**Updated ESAP - 01 February 2018 to replace the version updated 16 June 2017.** IESC NOTE: Status change items of note are highlighted in **yellow**.

	Task	Indicator of Completion	Timeframe
1	Eni Ghana with support from Vitol will develop a construction/ development phase Environmental, Social, Health Management Plan (ESHMP) and the relevant management plans and programs in advance of development drilling and construction, followed by a production/operations ESHMP which will be developed before first oil, with gas-related elements integrated as needed before first gas. The ESHMP will be updated as required, such as in the event of any significant changes to the project and its environmental and social risks and impacts occur, following a Management of Change process. The ESHMP will include social management plans and procedures to meet the objectives of the Performance Standards, and those plans and procedures will be incorporated into an integrated Environmental and Social (E&S) Management System for the OCTP project.	Plans and procedures submitted to WBG:  a) Development drilling and construction phase: ESHMP, Procurement Plan, Grievance Mechanism, Waste Management Plan, Security Management (Offshore) Strategy by November 15, 2015  b) Recruitment, Employment and Training Plan, Local Content Development Plan, Workers Development Plan, Marine Traffic Management Strategy, Commitment Register by end of November 2015  c) Development drilling and construction phase: all management plans (others than the plans specified in the action items below) approved by end of December 2016  d) Phase-1 commissioning and production operations: by end of August 2017 or one month prior to commissioning / production operations whichever comes first  e) Phase-2 commissioning and production operations: by end of July 2018 or one month prior to commissioning / production operations whichever comes first.	a) 11/15/2015 – Complete  b) 11/30/2015 - Complete  c) 12/31/2016 Complete  d) 08/31/2017 or one month prior to commissioning / production operations whichever comes first - Complete  e) 07/31/2018 or one month prior to commissioning / production operations whichever comes first
2	Eni Ghana will require that contractors adopt measures and bridging documents to ensure that their management systems are compatible with HSE Policy, guidelines and procedures and the project ESHMP.	Evidences (i.e., approved bridging documents) collected and submitted to WBG.	12/31/2015 – Complete and ongoing
3	Eni Ghana will implement well integrity and control strategies and develop specific Well Control Emergency Response Plans for each well drilled. All drilling programs will be approved by eni headquarters (that will act as independent, expert third party in charge of verification/review).	a) WCEMP applicable to the first three wells drilled approved by eni headquarters and submitted to WBG by September 2015, and evidences of implementation of the third party verification/review of the drilling programs by October 15, 2015  b) ) ) Auditable evidences of implementation provided to WBG in the Annual Monitoring Report.	a) 10/15/2015 - Complete b) 12/31/2017 - Complete  Note. This indicator of completion will be applicable to any future drilling for the Project
4	Eni Ghana will develop the specific E&S monitoring plans. A number of pre-construction surveys will be implemented, including: (i) preconstruction fish catch surveys at Sanzule and in the project area of influence, with specific focus on beach seine fishing activities; (ii) phyto- and zooplankton surveys (near the same time as the catch surveys and focusing on fishing grounds); (iii) ambient air quality and noise monitoring in the area of influence of the ORF; (iv) preconstruction survey of sensitive avian species that may be present,	a) Terms of reference of the time sensitive surveys (birds and sea turtles) submitted to WBG by end of October 2015	a) 10/31/2015 - Complete  b) 06/30/2016 - Complete

	Task	Indicator of Completion	Timeframe
	particularly during the boreal winter.	b) Pre-construction surveys and monitoring plans submitted to WBG.	
5	Eni Ghana will report on their best efforts to engage other developers, local institutions and government, and other stakeholders in designing coherent management strategies to mitigate cumulative impacts.	a) Cumulative impact mitigation strategy submitted to WBG  b) Evidences of implementation provided to WBG as part of the Annual Monitoring Report	a) 11/30/2015 - Complete  b) 12/31/2016 - Complete
6	Eni Ghana will update and refine the air emission dispersion and noise propagation modeling during production facility final design to inform the identification and development of a package of air emission reduction measures.	Modeling updated and submitted to WBG during production facility final design and by anticipated completion date.	10/31/2017 - Complete
7	Eni Ghana will develop and enforce a policy and relevant procedures to ensure that operations of drillship, support vessels and helicopters minimize disturbance to marine mammals and turtles.	Policy and procedures submitted to WBG.	12/31/2015 - Complete
8	Eni Ghana will maintain a quantification program for GHG emissions, according to an internationally recognized emissions estimation methodology, and will establish annual review programs to identify areas of improvement and GHG emission reduction. Eni Ghana has committed to implement a Zero-Permanent Flaring policy, and will implement measures for minimization of venting and flaring (consistent with the Global Gas Flaring and Venting Reduction Voluntary Standard) and minimization of fugitive emissions.	a) Quantification and minimization program for GHG emissions submitted to WBG  b) First annual report by anticipated completion date.	a) 10/31/2017 - Complete  b) 12/31/2017 - Complete
9	Eni Ghana will include an environmental lead as part of the oil spill response team and will develop a clear mechanism of escalation of response effort based on coastal and biodiversity sensitivity. Mutual aid agreements with other operators in Ghana will be established.	Evidences of implementation (i.e., approved revised OSCP) submitted to WBG.	12/31/2015 - Complete
10	Eni Ghana with the support of Vitol will develop and implement a Livelihood Restoration Plan (LRP) for affected people in the community of Sanzule. Once all mitigation measures have been substantially completed and displaced persons are deemed to have been provided adequate opportunity and assistance to sustainably restore their livelihoods, eni Ghana will undertake a completion audit comparing outcomes against objectives of the plan and current living conditions against living conditions prior to the start of the project. eni Ghana will develop a Land Acquisition and Compensation Framework for any potential additional land acquisitions that may be required for the project or future expansions.	a) LRP workshop held b) Draft final LRP submitted to WBG c) Final LRP submitted to WBG d) Update report by Eni Ghana/Vitol on actions taken (e.g., financial training, food aid, education and health support, stakeholder engagement, feasibility studies by the 4 NGOs). The report will also summarize implementation issues faced in 2016-2017 and lessons learned.  e) Evidences of implementation included in the periodic E&S progress reports and Annual Monitoring Report  f) Interim Implementation Audit carried out by an external	a) 10/31/2015 - Complete b) 11/30/2015 - Complete c) 12/31/2015 or six weeks prior to construction early works whichever comes first - Complete d) 02/28/2018 - completed  e) Based on LRP f) 03/31/2019 – Complete

	Task	Indicator of Completion	Timeframe
		<p>competent resettlement professional and report submitted to WBG</p> <p>g) Finalization report by implementing organization submitted to WBG and Completion Implementation audit carried out by an external competent resettlement professional and report submitted to WBG</p>	<p>g) Finalization report: at the completion of the LRP (updated Endline report has been completed by TechnoServe)</p> <p>Completion audit: One year after the completion of the implementation of the LRP (remains pending)</p>
11	Eni Ghana with the support of Vitol will develop a Fisheries Management Plan (FMP) to ensure fishermen are compensated appropriately and assistance for improving or at least restoring their living conditions is provided. The FMP will be monitored throughout its implementation to its completion. A participatory monitoring program will be developed with the involvement of local fishermen. The plan will also include a compensation framework in line with PS 5 in case fishers are adversely impacted by an oil spill.	<p>a) FMP strategy submitted to WBG.</p> <p>b) FMP submitted to WBG.</p> <p>c) Evidences of implementation of the FMP and participatory monitoring program included in the Annual Monitoring Report.</p>	<p>a) 12/31/2016 Complete</p> <p>b) 5/31/2017 or 2 months prior to construction sea pipeline whichever comes first - Complete</p> <p>c) 12/31/2017 Complete</p>
12	Eni Ghana with the support of Vitol will develop a Biodiversity Management Plan (BMP and relevant Biodiversity Action Plans) and will implement it, in collaboration with recognized species specialists. Seasonal constraints, associated with peak turtle nesting season between October and February and with dwelling season of the IBA triggering species, will be incorporated in the construction and operation management plans.	<p>a) BMP submitted to WBG, including identification of opportunities to enhance conservation of priority bird species (including specific focus on the hood vulture) and/or habitat in the project area</p> <p>b) BAPs for sea turtles and for birds submitted to WBG</p> <p>c) Evidences of implementation of the BMP / BAPs included in the Annual Monitoring Report.</p>	<p>a) 07/31/2016 - Complete</p> <p>b) 11/30/2016 - Complete</p> <p>c) 12/31/2017 - confirmed</p>
13	Eni Ghana will ensure that support helicopters will routinely avoid flying over the sensitive areas of Amansuri wetland and that, if avoidance is not feasible due to weather conditions, a minimum altitude will be specified, according to international good practice, when flying over this area to minimize disturbance to wildlife.	Evidences of avoidance (i.e., helicopter flight plans and relevant language on flights associated with emergency/oil spill response drills in the revised BMP - see Action Item 12) provided to WBG.	05/31/2016 - Complete
14	Eni Ghana and Vitol Ghana, as partner of the OCTP project, will develop and implement a community investment strategy for the area of influence of the project by identifying areas of potential social investment based on community assets and needs. The community investment strategy will be developed in consultation with local and regional stakeholders.	<p>a) Community investment strategy submitted to WBG</p> <p>b) Final Community Investment Strategy submitted to WBG</p> <p>c) Updates and evidences of implementation of the strategy included in the Monthly E&amp;S Reports and Annual Monitoring Report.</p>	<p>a) 12/31/2015 - Complete</p> <p>b) 10/31/2017 - Complete</p> <p>c) 12/31/2018 - Ongoing</p>
15	Eni Ghana and Vitol Ghana, as partner of the OCTP project, will hire an independent E&S consultant (IESC) to monitor and report on implementation of this E&S Action Plan and compliance with Performance Standards and E&S commitments. The monitoring visits will be carried out biannually (every six months) during development drilling and annually	<p>a) IESC's Terms of Reference submitted and approved by the WBG, and IESC hired</p> <p>b) First monitoring visit and report submitted.</p>	<p>a) 12/31/2016 - Complete</p> <p>b) 03/31/2017 - Complete</p>

	<b>Task</b>	<b>Indicator of Completion</b>	<b>Timeframe</b>
	during production operations. The reports of the IESC will be published.		
16	Vitol Ghana will assign an E&S assurance manager to the OCTP project to oversee environmental, health, safety and social aspects, ensuring compliance with Performance Standards and project E&S commitments.	E&S assurance manager appointed.	10/31/2015 - Complete
17	Vitol Ghana will develop and adopt a Human Resource Policy.	Human Resource Policy submitted to WBG.	12/31/2015 - Complete
18	Vitol Ghana will update its security policy to be aligned with the Voluntary Principles on Security and Human Rights.	Policy submitted to WBG.	12/31/2015 - Complete

**APPENDIX 2**  
**PROJECT DOCUMENTATION PROVIDED FOR REVIEW**

Environmental and Social Monitoring Report (September 2023)

Offshore Cape Three Points

<b>Document Title</b>	<b>Reference/Company</b>	<b>Issue/Effective Date</b>
OCTP Livelihood Restoration Plan: End of Project Report ('Endline' report)	TechnoServe	December 2022
Eni Ghana Clean Cooking Project III: Final Report	Alliance for Clean Cookstoves (GHACCO)	December 2022
IESC Audit September 2023: Eni Ghana SLC Slides (slide pack update, provide during site visit)	Eni Ghana SLC Team	September 2023
Livelihood Project Activity Update: World Bank Field Visit (slide pack update, provided during site visit)	TechnoServe	September 2023
Environmental Monitoring Campaign Offshore Cape Three Points - Offshore Ghana April/May 2022 Survey Report.	Freddie Jordan Oil Company Limited	December 2022
Landfall Pipeline Construction Avian End of Season Summary Report (March 2022 – February 2023)	ESL	July 2023
Landfall Pipeline Construction Avian End of Season Summary Report (June and December 2022)	ESL	July 2023
Permit Register	Eni Ghana	October 2023
ISO 45001 certificate	RINA	15 Dec 2022
ISO 14001 certificate	RINA	15 Dec 2022
Letter to Petroleum Commission relating to PC request for payment fees	Eni Ghana	March 2022
HSE Contractor Compliance Audit - ZEAL Audit Report	Eni Ghana	17 Aug 2023
HSE Contractor Compliance Audit - ZOIL Audit Report	Eni Ghana	12 Aug 2023
HSE Contractor Compliance Audit - Macro Shipping Limited Audit Report	Eni Ghana	13 June 2023
2023 Audit Programme	Eni Ghana	July 2023
Security Management Plan	Eni Ghana	8 Feb 2023
Environmental Permit for Production	EPA	15 May 2023
Job safety risk assessment – nest box installation	Eni Ghana	26 Sept 2022
Job safety risk assessment – control of invasive species (Consar site)	Eni Ghana	21 Aug 2023
Emergency Exercise Report – Full scale exercise FPSO Level 2 Fire and Explosion	Eni Ghana	31 March 2023
Management System Guideline – Procurement. Annex E Compliance and Counterparty requirements	Eni Ghana	30 June 2023
Procedure – Management of Sub Contractors (pro pr 008 Eni Ghana rev 0.0)	Eni Ghana	12 Dec 2016
Contractor HSE management (pro ms hse 014 eni ghana r06)	Eni Ghana	10 March 2023



Offshore Cape Three Points

<b>Document Title</b>	<b>Reference/Company</b>	<b>Issue/Effective Date</b>
Various other slide packs presented during the visit	Eni Ghana and ESL	September 2023
Eni Consolidated [Audit] Issue Tracker	Eni Ghana	Q4 2023

In addition to the documented listed above, reference was made to the suite of existing production phase E&S management plans and Annual/Quarterly Monitoring Reports produced by Eni Ghana and attachments therein. Information used in this report was also taken from a number of presentations given by Eni Ghana and its consultants during the visit.

## **APPENDIX 3**

### **MONITORING VISIT ITINERARY**

**Monday, Day1 (Accra)**

	<b>HSE</b>	<b>Social</b>
0900 - 10.30	Opening Meeting <ul style="list-style-type: none"> <li>• Introductions</li> <li>• Scope of site visit and logistics</li> </ul> Eni to present project status update including: <ul style="list-style-type: none"> <li>• Onshore - Main facilities</li> <li>• FPSO upgrade/Drilling activities/well conversions?</li> </ul> HSE and SLC organograms <ul style="list-style-type: none"> <li>• Roles and responsibilities</li> <li>• Contractors</li> </ul>	
10.30 - 12.00	Oil sheens – status update  Management of cumulative impacts	Meet with Sustainability and Local Content team members to get a high-level update on the team, team activities, and status of the various programs, including: <ul style="list-style-type: none"> <li>• Water Supply Project,</li> <li>• Education component of the LDPj-CIS:</li> <li>• Access to Energy: Rural Clean Cooking Project –</li> <li>• Economic Diversification: Building Businesses</li> <li>• Economic Diversification: Livelihoods / EDGE program</li> <li>• Influx Monitoring</li> <li>• Fisheries Management Coordination Committee</li> </ul> Note: that specific topics will be further discussed on Day 4.
12.00 - 12.30	Brief lunch break (food to be provided in office, if possible)	
12.30 - 13.45	HSE statistics/performance  Internal audit programme/ audit findings  ISO certification  HSE Training programme  MoC <ul style="list-style-type: none"> <li>- register of changes</li> </ul>	Meet with Eni Human Resources (and call in from any HR manager at ORF if useful), to discuss high-level updates on human resources at the ORF and FPSO, including status of IESC recommendations from last monitoring report: (a) for a review related to participation by women and the measures to help ensure equal opportunity and a supportive work environment for women, (b) the specific measures related to induction, awareness campaign and reporting of GBVH concerns, (c) mental health awareness campaigns, (d) outcomes of the review into contractor worker welfare management, (e) approach to doing worker interviews with contractor workers as part of audits.
13.45	Depart Eni Office to airport Flight AWA dep 16.10 to Takoradi Overnight at Takoradi	



**Tuesday, Day 2 (Sanzule)**

	<b>HSE and Biodiversity</b>	<b>Social</b>
07.00-9.30	Travel Takoradi to Sanzule	
9.30 – 10.00	Induction and brief update on activity at ORF	
10.00 – 12.00	<p>Discussions with <b>ESL</b> and Eni Ghana on environmental monitoring (scope, plans, monitoring activities, results)</p> <ul style="list-style-type: none"> <li>• Reinstatement and soil erosion</li> <li>• Swamp water levels/effectiveness of culverts</li> </ul>	<p>Brief discussion with Community Labor Relations Officer (or other Human Resources representative at ORF) to get update on worker grievance mechanism and any labour issues at site.</p> <p>Worker interviews: Ramboll to have three sets of 20 minute meetings, each with 3 to 5 workers. Two meetings with groups of two separate contractors, and one meeting with direct Eni Ghana workers. Eni to update Ramboll on the key contractors working at the ORF (e.g. for catering, housekeeping) and the number of workers present, so that Ramboll can confirm which contractor workers should be included in the interviews.</p>
	Lunch break	Lunch break
pm	<p>Site walk over (ORF facilities)</p> <ul style="list-style-type: none"> <li>• Permanent accommodation facility</li> <li>• Temporary waste storage area behind accommodation camps</li> <li>• Beach area (landfall)</li> <li>• Reinstatement areas</li> <li>• Other areas used to achieve as&gt;NNL</li> <li>• Former contractors workshop area</li> <li>• Sewage treatment plants</li> <li>• RoW reinstatement</li> <li>• Nursery</li> <li>• Site drainage/outfalls</li> <li>• HAZMAT facilities</li> <li>• Areas of ongoing construction/maintenance works.</li> </ul>	<p>Brief visit to permanent (and temporary, if still used) accommodation on site.</p> <p>Drive through Sanzule to Bakanta, to make observations of state of the road, to see the new school in Bakanta, and to meet with community representatives from Bakanta to hear feedback on their perspective of the Project including the education and access to energy programs.</p> <p>Brief visit to water supply network locations (s) to observe ongoing use.</p>
	Overnight near Sanzule	Overnight near Sanzule

**Wednesday, Day 3 (Sanzule)**

	<b>HSE &amp; biodiversity</b> <sup>29</sup>	<b>Social</b>
08.30-10.30	Environmental Monitoring (onshore) <ul style="list-style-type: none"> <li>• air (including ambient and stack emissions monitoring/CEMS).</li> <li>• surface water</li> </ul>	Meet with SLC and Tecnoserve teams to get an update on their activities, including progress with EDGE, LRP support services and endline survey / completion audit.
10.30-12.00	<ul style="list-style-type: none"> <li>• groundwater</li> <li>• treated effluents, including STP</li> <li>• noise and vibration</li> </ul> (Session to include ESL)	Meet with community members of the LRP Working Group, to get feedback on progress on the LRP and any issues arising. Note that the full LRP Working Group does not need to attend, just two or more community representatives would be useful.
	Lunch break	Lunch break
PM	Continue with above	Visit to EDGE demonstration sites and to EDGE program beneficiaries to see how they have been able to use the support for their own livelihood activity.
16.00	Return to Takoradi	

<sup>29</sup> Ramboll biodiversity specialist will join biodiversity meetings remotely.

**Thursday Day 4 (Accra office)**

	<b>HSE</b>	<b>Social</b>
7.00 – 10.30	Return to Accra, AWA flight dep. 08.30.	
10.30 – 12.30	<p>GHG emissions</p> <ul style="list-style-type: none"> <li>- Breakdown of emissions</li> <li>- Initiatives to reduce GHG emissions</li> </ul> <p>Emergency Response planning/drills/incidents</p> <p>Permitting status update</p>	<p>Meet with SLC team to go through specific items on:</p> <ul style="list-style-type: none"> <li>• Ongoing stakeholder engagement initiatives, and any key issues raised by stakeholders.</li> <li>• Community grievances received since September 2022.</li> <li>• Water Supply Project, including if Eni are aware of any disruption to supply or issues with water quality.</li> <li>• Status of the Education component of the LDPj-CIS:</li> <li>• Capacity-building Component – has this now completed?</li> <li>• Infrastructure Component – confirm that handover of all schools was completed and provide feedback on status of schools including any issues.</li> <li>• Access to Energy: Rural Clean Cooking Project – is this now completed?</li> <li>• Economic Diversification: Building Businesses – is this now completed?</li> <li>• Influx Monitoring – update</li> <li>• Update on the Fisheries Management Coordination Committee – is this still meeting, what are the issues raised etc.</li> </ul>
	Lunch break	Lunch break
13.30 - 17.00	<p>Offshore monitoring campaign for 2022 (report findings)</p> <ul style="list-style-type: none"> <li>- Produced water discharge</li> </ul> <p>Office based NNL discussions (programme/progress). Biodiversity specialist to join remotely.</p> <p>Discussions with <b>ESL and Eni Ghana</b> on biodiversity</p> <ul style="list-style-type: none"> <li>• Bird monitoring</li> <li>• Turtle monitoring</li> <li>• Marine mammals</li> <li>• Invasive species</li> </ul> <p>Marine mammal and sea turtle encounters reported as part of MMSTPPP</p>	<p>Meet with SLC team to go through specific items on:</p> <ul style="list-style-type: none"> <li>• Any items not covered from morning agenda</li> <li>• Economic Diversification: Livelihoods / EDGE program, including the next steps and remaining actions to close the program</li> <li>• Livelihood restoration, including the next steps for endline survey, completion audit, and discuss the recommendations made by the IESC on the proxy metrics</li> </ul>

**Friday, Day 5 (Accra)**

	<b>HSE</b>	<b>Social</b>
9.30 – 11.00	Security management plan  Contingency time (revisiting earlier issues as necessary)	Meet with SLC team to go through any items that could not be addressed in Thursday’s agenda Summarize with the SLC team the remaining actions / priorities to close the various programs.
11.00-12.00	IESC prep time	
	Lunch break	Lunch break
13.00-15.00	No surprises mtg	
15.00 – 16.30	Close out Meeting	



**APPENDIX 4**  
**STATUS OF ISSUES IDENTIFIED IN PREVIOUS MONITORING VISITS**

This Appendix presents previously unclosed issues identified during previous site visits/desk-top reviews. Within the ID column, an issue is identified by a composite reference number combining the issue number and year (for example, '001\_5/19' which refers to the first issue in the May 2019 report).

**Table A1. Issues identified prior to the September 2023 site visit**

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendations</b>	<b>Significance</b>	<b>Open/Closed/Superseded (IESC Opinion)</b>
001_9/22	Audit action tracking	Closure dates for the findings were not specified in a Contractor audit report (Baj Freight) nor in the consolidated audit findings action register; 4 audit findings/corrective actions remained open four months after the audit.	PS1	Target dates and individuals responsible for the closure of these items should be specified and actions closed in a timely manner.	<b>Minor</b>	<b>Closed</b>
002_9/22	Cumulative Impacts	Following inauguration of the multi stakeholder cumulative impacts co-management platform, priority actions appear to focus solely on fisheries management. Disagreements over funding mechanisms persist.	PS1	Eni Ghana should use it best efforts to influence the Terms of Reference for the Technical Committee such that it includes consideration of biodiversity issues that align with commitments (ACAs) in the Avian and Sea Turtle BAPs (the IESC acknowledges that fisheries management can make a significant contribution to reducing sea turtle by catch) To the extent feasible, Eni Ghana should also seek to resolve the disagreement over funding mechanisms.	<b>Moderate</b>	<b>Superseded</b> (see 003_9/23)
003_9/22	Emergency Response Planning	There continues to be a discrepancy between the wording of the AMR template and Eni Ghana's schedule for oil spill response drills	PS1	The discrepancy should be resolved with the WBG. The meaning /intent behind the term 'drill' should be clarified such that IFC intent is made clear i.e. simple drill versus larger scale scenario based exercise.	<b>Minor</b>	<b>Open</b> (full scale oil spill exercise not conducted in 2023)

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
				Eni Ghana should also conduct an oil spill exercise that includes deployment of oil recovery equipment.		
004_9/22	Permits	Eni Ghana is missing one key permit – the Production Permit issued by the Petroleum Commission. The permit is held up due to a dispute around Production fees payable to the Petroleum Commission.	PS1	Eni Ghana should keep WBG informed of its efforts to resolve the dispute and to acquire the Production Permit.	<b>Minor</b>	<b>Open</b> (Eni Ghana is firmly of the belief that fees do not need to be paid and has stated its position to the PC - no further requests for payment have been made).
005_9/22	Influx monitoring	The reporting of influx monitoring would benefit from the inclusion of data to reflect population trends in the broader region, i.e. in areas with no impact from the Project. This will help to show if the modest changes in population levels in DAoI communities are similar or different to broader population trends.	PS1	The next set of influx monitoring reporting should include the analysis of published data for neighbouring areas as a 'control group' to demonstrate broader population trends that are occurring in the region. This does not need to involve further data collection as relevant time series population data may be available from the PHC or other Ghana Statistical Service datasets.	<b>Minor</b>	<b>Superseded</b> (see 001_9/23)
006_9/22	Influx monitoring	If the population estimates from the next round of influx monitoring do not indicate any notable increase in in-migration then that next round of influx monitoring could be the final one. If that is the case then the next set of monitoring should include feedback elicited from local community representatives to verify that the community do not consider influx as an ongoing issue that needs to be monitored.	PS1	The next influx monitoring report should include feedback elicited from local community representatives to verify whether the community consider influx as an ongoing issue that needs to be monitored. If the results of the next round of monitoring and the feedback elicited from local community representatives indicate that there is no measurable influx attributable to the Project then the Project-level influx monitoring activity can be ended.	<b>Minor</b>	<b>Superseded</b> (see 001_9/23)

<b>ID</b>	<b>Aspect</b>	<b>Issue Description</b>	<b>Phase</b>	<b>IESC Recommendations</b>	<b>Significance</b>	<b>Open/Closed/ Superseded (IESC Opinion)</b>
007_9/22	Population change as part of cumulative impacts	IESC notes that cumulative impacts on the population within the broader region may continue, even if direct Project impacts on DAoI communities are not material.	PS1	As part of Eni Ghana's engagement with the steering and technical committees of the Cumulative Impact Co-Management Platform, recommend that population change is considered as a topic for inclusion in the work of the platform.	<b>Minor</b>	<b>Open</b> See comments on the status of the Cumulative Impact Co-Management Platform
008_9/22	Worker grievance mechanism	IESC notes that with COVID-19 restrictions at the ORF and with the offshore nature of the FPSO, there may be no or limited opportunity for local contractor workers to have in-person contact with the CLOs while working at these sites on rotation. Given the length of rotations (i.e. 28 days) this leaves a long period of time in which local contractor workers may not have an opportunity to raise grievances in-person to a CLO.	PS1 and PS2	Eni Ghana review the methods through which local contractor workers can raise grievances directly to Eni Ghana, and specifically if they are not achieving resolution through their employer or if they have concern about confidentiality and retribution. This review should ensure that there are methods available for contractor workers at the ORF, FPSO and other work sites to raise grievances in writing or verbally, including with options to do so anonymously.	<b>Moderate</b>	<b>Closed</b> Communication campaign about the grievance mechanism has been undertaken
009_9/22	Health and safety performance	The Lost Time Incident indicated for 2021 in the HSE presentation is not recorded in the 2021 Annual Monitoring Report. The nature of the incident is therefore unclear to the IESC.	PS2	Eni Ghana to confirm whether there was an LTI in 2021. If an incident occurred, the incident report should be provided to the IESC and Lenders.	<b>Minor</b>	<b>Closed</b> (it is understood the LTI did not relate to the OCTP block)
010_9/22	Participation of women in the workforce	The low levels of participation by women in the ORF and FPSO workforce may arise from a variety of factors, and there may be limits to the availability of skilled woman workers available to work the required shift and rotation patterns at the remote sites for a variety of cultural, economic and historic reasons. Although Eni Ghana apply has	PS2	Undertake a review to firstly identify whether there are any work practices that are directly or indirectly limiting participation by women at the ORF and FPSO, and secondly to identify measures to revise these practices and help ensure equal opportunity and a supportive work environment for women at the ORF and FPSO. The IESC recommends that this review would include	<b>Minor</b>	<b>Closed</b> Review has been undertaken and measures implemented to support women participation

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
		approaches for a gender-friendly workplace, including smart working and gender-neutral job postings, they have not conducted a systematic review of the potential barriers to higher participation by women in the ORF and FPSO workforce.		requests for feedback from past and present Eni Ghana and contractor women workers to understand potential barriers that they faced in relation to employment at the ORF and FPSO.		
011_9/ 22	Potential for gender-based violence and harassment at the ORF and FPSO	IESC also notes that the low number of women workers at the ORF and FPSO has the potential to heighten risks of gender-based violence and harassment (GBVH) for these women, particularly given the remote nature of the sites.	PS2	<p>IESC recommends the following additional safeguards are implemented to support the existing safeguards for this risk:</p> <ul style="list-style-type: none"> <li>• The inductions provided for all workers on arrival at the ORF and FPSO to include training on GBVH, using the 'Eni against violence and harassment in the workplace' Guideline as the basis for training.</li> <li>• Ongoing awareness campaign on the strict prohibition of GBVH, including clear descriptions on what is considered unacceptable behaviours, also to be based on the Eni guideline.</li> <li>• Workers to be made aware of gender-sensitive ways of reporting GBVH concerns, such as a through a woman Eni Ghana point of contact.</li> </ul>	<b>Minor</b>	<b>Closed</b> Applicable measures have been implemented
012_9/ 22	Contractor management of worker welfare	IESC undertook two group interviews with workers from two contractors working at the ORF and some issues of labour and working conditions were raised. The issues raised by the workers may be indicative of a grievance mechanism that is not adequately	PS2	Eni Ghana to conduct a review of the reported issues amongst contractor workers and define corrective actions as required. The identification of corrective actions should consider the potential need for changes in worker welfare monitoring, potentially to include increased discussions with	<b>Moderate</b>	<b>Closed</b> Applicable measures have been implemented

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
		capturing and remedying grievances from contractor workers and may be indicative of gaps in the monitoring of contractor worker welfare issues by Eni Ghana.		contractor workers by Eni Ghana on a regular basis as well as part of audits conducted on contractor performance.		
013_9/ 22	Contractor management of worker welfare	The existing COVID-19 restrictions in place by Eni Ghana require that contractors have their workers accommodated at the ORF during their rotation. IESC notes that once the COVID-19 restrictions are relaxed, there is the potential for contractors to establish accommodation units for their workers in local communities, and there is a potential risk that any such accommodation does not address the applicable standards for worker welfare and safety or presents a risk to community health, safety and wellbeing.	PS2	Following changes to the requirements for contractor workers to be accommodated at the ORF, Eni Ghana to monitor the establishment of any contractor accommodation in local communities. If such accommodation is established Eni Ghana should conduct monitoring to verify that the accommodation addresses the applicable standards for worker welfare and safety, and that it does not present a risk to community health, safety and wellbeing.	<b>Minor</b>	<b>Closed</b> Evidence provided that Eni Ghana are identifying contractor provided accommodation and requiring inspection where established
014_9/ 22	Mental health support for workers	While support services are available to respond to workers raising mental health concerns, there appears to be limited support to workers at the ORF and FPSO to create awareness of mental health issues, to reduce stigma, and to proactively encourage workers to seek support for mental health issues. These provisions are important given the work practice of 28-day rotations at remote sites, which have the potential to limit the support networks (family, friends, medical care) that are available to workers. While IFC PS2 is not specific on requirements for mental health support, IESC considers that with the length of rotation at remote sites, such support is an	PS2	A mental health awareness campaign should be run periodically at the ORF and FPSO to support awareness of mental health issues and to signpost to available support resources, including those provided by Eni Ghana.	<b>Minor</b>	<b>Closed</b> Applicable measures have been implemented

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
		applicable requirement to address employer responsibilities for occupational health and safety as per IFC PS2 paragraph				
015_9/ 22	Contractor audits	IESC was provided with a copy of a contractor audit performed by Eni Ghana in 2021, as an example of the scope of contractor audit undertaken by the Project. This audit report showed that labour and working conditions are included within the scope of the audit, but the approach is limited to interviews with contractor representatives and does not involve direct discussions with workers to identify any issues of concern. Such worker discussions may have been limited since 2020 due to COVID-19 control protocols. Changes in these protocols would allow such discussions to take place as part of future contractor audits.	PS2	Confidential discussions with a sample of contractor workers should be used as part of contractor audits to check for non-compliances with labour and working condition requirements.	<b>Moderate</b>	<b>Closed</b> Eni Ghana are using informal discussions with contractor workers to help identify issues of concern.
016 9/22	Oil sheen	A number of oil sheens originating from leaks at the OP7 Xmas tree have been detected since mid-2021. Temporary corrective actions have been used to stop ongoing leaks but a longer-term permanent solution, likely involving the replacement of the OP7 Xmas tree, is required.	PS3	The following actions should be taken by Eni Ghana: <ul style="list-style-type: none"> <li>• continue to closely monitor for oil releases.</li> <li>• develop a road map/action plan for the permanent solution and report progress against the action plan to WBG and the IESC via existing communication mechanisms e.g. monthly operations reports and QMRs.</li> </ul> Criteria for shutting down the well should be predetermined to avoid a prolonged decision-	<b>Potentially Moderate</b>	<b>Closed</b> (further interventions are proving to be effective in the short term and a long term solution has been agreed)

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
				making process in the event of future release/increased severity.		
017_9/22	Offshore monitoring campaign	The survey report is currently in preparation the IESC will await its completion before reviewing in detail. In the interim a number of observations are made for consideration when finalising the report.	PS3	<p>In the interim, the IESC makes the following comments:</p> <ul style="list-style-type: none"> <li>The influence of seasonality on survey results should be described in the report.</li> <li>Sample results from the recent survey should be compared with both 2017 and 2018 results and any baseline survey results were possible.</li> <li>Careful interpretation of the elevated As and Ba results in sediments, including toxicity on benthos and commentary on whether the same locations had been previously sampled in 2017/18.</li> </ul> <p>Lesson learned should be clearly described, for example, problems associated with laboratory analysis timescales that may have invalidated total coliform results.</p>	<b>Minor</b>	<b>Open</b> (the report did not address the IESC's recommendation, however it is understood ToRs for future surveys will reflect the recommendations)
018_9/22	Effluent discharges	PAC – results for TSS, nitrogen, phosphorus and COD in Q1 2022 were above the applicable Project standards.	PS3	The effluent results in Q2 2022 should be carefully scrutinised and further investigations conducted if effluents from the PAC continue to exceed the applicable Project standards.	<b>Minor</b>	<b>Open</b> (effluent remains out of spec)
019_9/22	Stack emissions monitoring	ESL has suggested that the high carbon monoxide levels are due to incomplete combustion of gas.	PS3	High CO levels in the MPG stack emissions should be investigated and rectified such that emissions comply with national standards.	<b>Minor</b>	<b>Superseded</b> (see 016_9/23)
020_9/22	GHG emissions reporting	Eni Ghana does not categorise emissions from support and supply vessels associated with its offshore operations that are owned	PS3	On the understanding that vessel emissions sources are already captured within SHERPA as scope 3 emissions, Eni Ghana should review its	<b>Minor</b>	<b>Open</b>



ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
		or controlled by Eni Ghana as Scope 1 emissions. Consequently, these emissions are not included in annual GHG emissions reporting to the WBG.		categorisation for Project vessel emissions and include them in the Scope 1 and 2 annual emissions reporting to the WBG as appropriate. Any change to the methodology used to report scope 1 and 2 emissions should be applied retrospectively to previous years to ensure like-for-like comparison with preceding years.		(Eni Ghana rejected the IESC's recommendation)
021_9/22	Energy efficiency	An energy efficiency audit identified two priority areas of improvement related to i) offshore power generator optimization, and ii) water injection optimization.  It is currently unclear whether Eni Ghana has plans to further explore the viability of these opportunities.	PS3	Eni Ghana to clarify its position with respect to the opportunities for GHG emissions reductions identified in the energy efficiency audit.	<b>Minor</b>	<b>Closed</b>  (i) confirmation that generators are not on hot standby and recalibration of gas meters.  (ii) improvement related to the water injection pumps at the FPSO, is under evaluation by Engineering team
022_09/22	Onshore security management at ORF – military police	An informal arrangement exists between Eni Ghana with respect to the detachment of military police based in the vicinity of the ORF.	PS4	Eni Ghana should continue to implement its best endeavours to reach a formal agreement with the military police. The MoU with the Navy serves as a precedent and could be used as a template for any MoU with the military police.	<b>Moderate</b>	<b>Closed</b>  (Eni Ghana has confirmed it will not enter into such a MoU)
023_09/22	Onshore security management at ORF	The new security provider (G7) can call upon the Ghana Police if necessary. The arrangement is between the security provider and the Police, and Eni Ghana is not directly involved.	PS4	Eni Ghana should work with the G7 to understand the circumstances under which Police support would be sought and the working arrangements between G7 and the police in the event of security threat. It is recommended that working	<b>Minor</b>	<b>Open</b>

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
				arrangements should be tested via a security-based emergency exercise.		
024_09/22	Security Management Plan	The latest version of the SMP available to the IESC dated November 2020 includes content, in particular relating to the onshore security provider and status of MoUs, that has been superseded.	PS4	The SMP should be revise and reissued to reflect current security arrangements.	<b>Minor</b>	<b>Superseded</b> (see 018_09/23)
025_09/22	Analysis of livelihood restoration status	IESC has identified potential issues with the analysis used to incorporate proxy metrics in the determination of whether livelihoods have been adequately restored.	PS5	Review the issues raised by IESC on the use of proxy metric data, weighting and thresholds, in determining whether livelihoods have been restored. Where necessary, revise the method and develop a short report that describes the method that is applied, and clarifies how this data and analysis will be used in any future endline reporting and the completion audit. This will need to be fully resolved in time for further endline reporting and the completion audit.	<b>Moderate</b>	<b>Closed</b> The Endline Report has used different methods for defining livelihood status. The Completion Audit will need to be reviewed (as per action 019_09/23 under PS5) to confirm appropriate use of metrics
026_09/22	LRP Completion Audit	IESC notes that the LRP Completion Audit will need to consider the significant economic impacts to PAPs that have been caused by COVID-19 and the current high levels of inflation. These impacts will have negatively affected PAPs livelihoods, entirely outside of the impact created by the economic displacement caused by the Project. These economic challenges will have made it harder for the Project to restore livelihoods to baseline levels,	PS5	The Completion Audit should acknowledge the impact that these economic challenges will have had on livelihoods, and if livelihoods have not been restored due to these external factors, that recommendations for any further support measures are made based on the Project’s responsibilities in line with PS5.  IESC considers that a delay for the Completion Audit from the second quarter of 2023 may be preferable in order to help capture the impacts of the additional support measures. IESC	<b>Minor</b>	<b>Superseded</b> See action 019_09/23 under PS5

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/Superseded (IESC Opinion)
		particularly when inflation is taken into account.		recommends that the schedule for the Completion Audit is clarified in a MoC notification		
027_09/22	Communication between Biodiversity and Social Teams and impact assessment of the beach road works on sea turtle nesting habitat.	<p>Laterite has been used to upgrade the beach road to Bakanta. It is understood from ESL’s turtle expert this was potential nesting habitat for turtles and that the biodiversity team was not made aware of plans to upgrade the road. The level of impact is unclear but nevertheless:</p> <ul style="list-style-type: none"> <li>• The Biodiversity/ESL turtle specialist should have been consulted prior to road upgrade.</li> <li>• In general, better processes (outside of MoC) to ensure liaison between SLC and Biodiversity teams is required where their goals overlap.</li> <li>• Retrospective assessment of impact is required and confirmation required that measures in Turtle BAP are sufficient to ensure NNL/NG.</li> </ul>	PS6	<p>Better communication is required between the biodiversity and social teams, for example through regular meetings between the functions so that each is aware of the other’s planned activities. This is also recommended because community engagement activities are a significant aspect of the Biodiversity Action Plans and No Net Loss Implementation Plan. This communication will need to be ongoing and verifiable, e.g. through meeting notes included in the QMRs.</p> <p>Retrospective assessment of the level of impact and confirmation that the Bakanta road upgrade works have not compromised the Sea Turtle BAP. Should a significant residual effect be identified as a result of this assessment, suitable mitigation/ compensation will need to be implemented, with evidence provided in the QMR/ AMR reporting.</p>	<b>Moderate</b>	<b>Ongoing/Pending</b> (IESC has been informed better communications take place however it is not possible to verify - this issue is closed but will be monitoring during future visits, and in particular, during development of the new Bakanta Road)
028_09/22	BAP warning threshold for sanderling density	When the BAP was finalised in 2020 it was noted that insufficient data was available for a warning threshold to be set for sanderling density, but that this would be developed on completion of the 2020/21 monitoring period; however, this remains outstanding.	PS6	Based on the combined latest dataset for sanderling, develop a BAP warning threshold for sanderling density. Whilst it is appreciated that Eni Ghana have limited ability to intervene to increase population numbers if declines are occurring elsewhere along the migration route, the development of a warning threshold was a commitment of the BAP which remains outstanding.	<b>Minor</b>	<b>Open</b> (the shorebird presentation given during the monitoring visit suggests the BAP target of 12.3/km is also being used as the warning

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
						threshold – this should be confirmed)
029_09/22	Alternative shorebird ACA; Data requests and sharing	<p>There is a need to identify an alternative Additional Conservation Action to replace the intended collaboration with CAW now that their shorebird study has finished, e.g. formalising the contextual data collection by the field survey team at the Ankobra estuary.</p> <p>It is understood that no Project biodiversity data has yet been shared with the wider scientific community to improve regional conservation efforts.</p>	PS6	<p>Identify an alternative Additional Conservation Action to replace the intended collaboration with CAW, such as the continued data collection at the Ankobra estuary, and implement this through the Avian BAP.</p> <p>Since their shorebird study has finished, request any relevant contextual shorebird data from CAW to better inform the Project's analysis of shorebird numbers and influencing factors. This should include monitoring data for the shorebirds themselves and prey density data, to inform interpretation of Project survey results.</p> <p>Share Project-related biodiversity data with the wider scientific community, including the Global Biodiversity Information Facility.</p>	<b>Minor</b>	<b>Open</b> (it is understood that it is unlikely to be possible to gain access to CAW's information as the entity is no longer operational, however the rest of the recommendation still stands)
030_09/22	AIS	It is understood that there is an intention to pursue herbicide application to control problematic invasive species on-site however, this alone is unlikely to resolve the issue and should be combined with the continuation of manual measures that have been effective to date.	PS6	Consult expert sources such as the Global Invasive Species database regarding optimal control of <i>Imperata cylindrica</i> , potentially proceeding with multiple integrated techniques.	<b>Minor</b>	<b>Open</b> (plan is to use herbicide with manual removal however remains open until an effective solution is demonstrated)
031_09/22	Long-term budget for>NNLIP	A long-term budget forecast (10-20 years) for the>NNLIP has specifically been requested by WBG/IFC.	PS6	Eni Ghana to provide a long-term budget forecast for the implementation of the>NNLIP	<b>Minor</b>	<b>Open</b> (IESC informed that budget has been shared with WBG,

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
						however not yet evidenced by IESC)
032_09/22	Bioaccumulation of metals	Elevated water and sediment metal concentrations have been reported in areas around the FPSO, therefore the potential for these to bioaccumulate in the food chain should be considered by the experts in their reporting and recommendations. For example, is testing of fish tissue samples from local fishermen justified?	PS3/PS6	Environmental reporting to include recommendations for further monitoring including consideration of testing for bioaccumulation, followed by evaluation and implementation by Eni as deemed necessary.	<b>Minor</b>	<b>Closed</b> (understood that further studies are being commissioned to measure metals in benthic organisms/fish tissues)
003_5/21	Audit Programme – waste service provider	IESC notes that three corrective actions identified during the 2017 audit of Zoil, including one major non-conformity relating to the storage area of Oil Based Muds (OBMs), have not been closed (or have been reopened).	PS1 and PS3	Eni Ghana should follow up on significant 'open' actions on a regular basis and consider alternative disposal options for any future OBMs until the audit action is closed and it is satisfied with the OBM storage arrangements offered by Zoil.	<b>Minor</b>	<b>Superseded</b> (there has been no drilling for the last 12 + months)
012_05/21	Stack emissions monitoring	A CEMS will be commissioned in late <del>2021</del> . 2023	PS3	A robust calibration is performed to ensure data generated by the CEMS is accurate and reliable in the absence of the originally envisaged stack emissions sampling. The CEMS should be calibrated to allow recording and reporting daily averages, under temperature and oxygen conditions required in WBG EHS guidelines.	<b>Minor</b>	<b>Superseded</b> (CEMS no longer considered viable)
020_05/21	Livelihood restoration: Monitoring and evaluation	Current Eni Ghana and TechnoServe reporting on livelihood restoration status does not clearly and unambiguously provide a breakdown of livelihood restoration status between vulnerable and non-vulnerable PAPs.	PS5	Eni Ghana to ensure that vulnerable PAPs are identified clearly and livelihood restoration status for the vulnerable PAPs is presented, consistently, in all future reporting on livelihood restoration status.	<b>High</b>	<b>Superseded</b> See action 019_09/23

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
021_ 05/21	Biodiversity staff training records	Not all training listed could be verified making it difficult to track BAP targets relating to training.	PS6	Full training transcripts and correctly dated attendance records should be kept for all training sessions held, with a date clearly shown. These should be provided as an Annex to the QMR and AMR reports.	<b>Minor</b>	<b>Open</b>  (Training events and attendance records continue to be reported; however full training transcripts are not being provided for review to verify content) Incidental sightings of Marine Mammals by staff should be encouraged during training events and evidence provided in the form of training transcripts
023_ 05/21	Staff training on birds	The subject of the staff training material for birds lacks the specifics of key bird species of interest in the vicinity of the Project site and Eni Ghana's commitments relating to these.	PS6	Specific information should be added relating to the key bird species of interest in the vicinity of the Project site and Eni Ghana's commitments relating to these, in line with the requirements of the Avian BAP.	<b>Minor</b>	<b>Open</b>  (It was verbally indicated by ESL during the monitoring visit that this material has been added, but no full updated induction training transcript has been provided, or evidence that new staff joining during

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
						the reporting period have been trained in accordance with the BAP requirements)
025_05/21	Marine Mammal and Sea Turtle Protection Policy and Plan	In addition to incidental sightings of marine mammals and sea turtles, it is noted that further noisy works may occur during the production phase, therefore it is noted that there will also be a need to conduct dedicated watches prior to such works to ensure the area is clear before start-up.	PS6	<p>Ensure that records are kept relating to the scheduling of noisy works to avoid key sensitive periods for marine mammals and sea turtles and the briefing of any new vessels, including drill ships, coming to site on the requirements of the MMSTPPP, including the delivery of specific training on the importance of maintaining distance and using dedicated navigation channels where applicable. Records should also be kept of dedicated watches prior to new noisy works such as drilling events.</p> <p>The MMSTPPP should be amended to include dedicated watches when noisy activities are taking place.</p>	<b>Minor</b>	<p><b>Open</b></p> <p>(no watches reported in the monitoring period, therefore it is assumed that no noisy works to place, though marine mammal training was conducted for FPSO staff during the reporting period)</p> <p>Update of MMSTPPP to include dedicated watches during noisy activities (e.g. drilling) to be captured before issue can be closed)</p>
005_11/20	Surface water quality	Closer attention should be given to the information requested in the AMR reporting template, noting that data provided to the Environmental Protection Agency (EPA) is	Production phase	Data presented to the EPA should also be provided to the IESC for review.	<b>Low</b>	<p><b>Open</b></p> <p>(no additional information</p>

ID	Aspect	Issue Description	Phase	IESC Recommendations	Significance	Open/Closed/ Superseded (IESC Opinion)
		requested and therefore should be included in future AMRs.				provided in the 2021/2022 AMRs)
009_5/19	Community water quality	<p>Eni Ghana/ESL has not undertaken water level/drinking water quality monitoring from community wells.</p> <p>Eni Ghana indicated that it was not part of ESL's scope to analyse water quality for drinking water parameters, but instead this was the responsibility of the SLC team.</p>	<p>PS3</p> <p>Construction and Production</p>	<p>Eni Ghana should clarify its position with respect to the monitoring of water quality from community water wells and fulfil the requirements of the Environmental Monitoring Programme (2018).</p> <p>Eni Ghana have provided contradictory information concerning the use of old drinking water wells. Consequently, it is believed some individuals are still using the old wells.</p>	<b>Minor</b>	<p><b>Open</b></p> <p>(Remains open unless Eni Ghana can confirm no use of the wells. SLC manages monitoring of water quality for the water supply project)</p>



## **APPENDIX 5 PHOTOLOG**



**Photo 1.**

Slope providing access to the nursery. Use of concrete slope presents a slip hazard



**Photo 2.**

Collapsed metal fencing at the old Consar site



**Photo 3.** Drainage channels with established vegetation reducing sediment in discharge of surface water from site



**Photo 4.** Rare example of soil erosion in proximity of the swamp





**Photo 5.** Example of successful reinstatement of previously cleared land using native species



**Photo 6.** Swamp adjacent to pipeline RoW. No evidence of stress from the Project



**Photo 7.** Example bird box installed as part of NNL initiative



**Photo 8.** Gas cylinders sitting on a pallet and secured to wire fence as a temporary measure -risk of toppling



**Photo 9.**

Container without clear label to identify contents. Risk of misidentification if stored in the wrong location



**Photo 10.**

Protruding rebar. Use of transparent plastic bottle to improve visibility/reduce trip risks has limited effect





**Photo 11.** Rusted and loose barbed wire at head height around the pilot camp presents a hazard to residents, particularly at night when visibility is poor



**Photo 12.** Pooled water in an area scheduled for decommissioning is providing habitat for mosquito larvae



**Photo 13.** Leaking fire water storage tank at the Pilot Camp



**Photo 14.** Pooling water resulting from leaking firewater storage tank





**Photo 15.** Cats are being encouraged by staff at the ORF site. This practice should be discouraged due to likely harm to wildlife and the message reinforced at staff training events



**Photo 16.** Reinstatement of area used as laydown during pipeline repositioning. Fencing removed following successful establishment of coconuts



**Photo 17.** Old Consar laydown/workshop site. Evidence of the AIS *Imperata cylindrica* despite efforts to remove it



**Photo 18.** Windows left open in air-conditioned rooms