

## Action Plan Status and Update

Please provide an update on the environmental and social action plan.

ID	Issue	Actions	Time table	Months from loan approval	Responsibility <sup>1</sup>
<b>Integrated Environmental, Social, Health, Safety, and Security Management System</b>					
1	Bankers Petroleum will accelerate the final development and implementation of their Environmental, Social, Health, Safety, and Security Management System.	1(a) Building on the E&S assessments previously carried out, available baseline information and social baseline information (Action Plan ID 2 (c) below), the program will consider all proposed development activities and their potential to interact with the biophysical and human environment. Where not already available, additional measures to minimize or avoid potential adverse impacts and risks will be developed and implemented, and included in the integrated Management System. The outcome of the assessment will be documented.	Within 9 months after Hiring Environmental Manager and Community Liaison Officer.	15	PSD & DFCS
		1(b) Hire (or contract) an Environmental Manager who will advise, coordinate and monitor all of the environmental issues associated with Bankers Petroleum's development program and activities. The Environmental Manager will work with the HSE Manager to identify specific environmental impacts and risks, coordinate the development and implementation of mitigation plans and procedures, liaise with the environmental regulators, carry out monitoring audits and inspections and report to Bankers management, regulators and lenders.	Within 6 months after loan facility approval	6	PSD & DFCS
		1(c) Hire (or contract) a Community Liaison Officer who will be responsible for the coordination of the relationships between Bankers Petroleum and affected communities, develop a process to increase awareness and capacity to address social issues within the Company, undertake ongoing and consultation and disclosure activities (Action Plan ID 2 (d) below), coordinate public training and provide advice on project facility hazards and limitations of public access into safety zones (Action ID 4 (f) below), manage the grievance mechanism (Action Plan ID 2 (e) below), and coordinate the	Within 6 months after loan facility approval	6	PSD & DFCS

<sup>1</sup> General Director (GD); Project Services Director (PSD); Director of Finance and Corporate Services (DFCS); Health, Safety and Security Manager (HSSM); Community Liaison Officer (CLO); Environmental Manager (EM); Environment and Civil Manager (ECM); Community Relations and Commercial Coordinator (CRCC)

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		implementation of the Social Management Strategy of Bankers Petroleum. The Community Liaison Officer function will be located in the field. The Community Liaison Officer will work closely with the Environmental Manager, Health, Safety and Security Managers, the Public Relations and Community Relations Coordinators.			
		1(d) Update and consolidate the employee training matrix and records to ensure training in accordance with Company policies, plans and procedures is implemented.	Within 15 months after loan facility approval	15	PSD & DFCS
		1(e) Consolidate, include and implement all company specific standard operating procedures and safe working practices for project development activities into the Management System. Include all plans and procedures included in this action plan as they are developed.	Within 15 months after loan facility approval	15	PSD & DFCS
<b>Social Management, Consultation and Disclosure Program</b>					
2	<p>Bankers Petroleum will develop and implement a Social Management Strategy and procedures for their current and proposed future operations to avoid or mitigate identified adverse social risks and impacts and enhance positive benefits. This Plan and procedures will be integrated into the Company Management System.</p> <p>Many of the Social Management, Consultation &amp; Disclosure programmes are required as a result of legacy activities undertaken by the state enterprises and as such actions are reliant on the support of GOA, Albpetrol, AKBN and Donor organizations forming a working group with BPAL to support</p>	2(a) Bankers will work with IFC and EBRD to develop a Terms of Reference to hire an experienced short term consultant to develop a social development program that will be integrated into Bankers Management System. Specific deliverables will include but are not limited to the items 2 (b) to 2 (c) and components of 2 (d) below. The Community Liaison Officer must be hired prior to undertaking 2(d).	(i) ToR ready within 2 months after loan facility approval; (ii) Hiring within 5 month after Loan facility approval (or prior to first disbursement, whichever comes first)	5	PSD & DFCS & CLO
		2(b) Conduct consultation and disclosure activities about Bankers' current and planned activities based on the locally disclosed ESRS and ESAP, and ensuring representatives of all directly affected communities are reached, in view of better understanding and managing risks and expectations related to Bankers operations and development plans in the communities. Produce detailed documentation of the meetings held to that end.	Prior to loan facility approval	0	PSD & DFCS (with support from ECM & CRCC)
		2(c) Conduct a socio-economic baseline study to build the Company's social impact and risk	Within 3 months after	8	PSD & DFCS & CLO

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	initiatives and work together for joint future solutions.	assessment. This data will help define who the key stakeholders are, inform community engagement and development activities, and provide a benchmark against which to monitor and evaluate the effectiveness of the Social Management Strategy <sup>2</sup> .	ID 2(a) (ii) above		
		2(d) Develop and implement a Stakeholder Engagement Plan <sup>3</sup> (SEP) that is based on the socio-economic baseline study, and community risk and impact assessment. The engagement plan will contain consultation and disclosure procedures that comply with national law, Bankers policies and procedures and IFC performance standards and EBRD procedures. The plan will: <ul style="list-style-type: none"> <li>- Describe regulations and requirements;</li> <li>- Identify and prioritize key stakeholder groups;</li> <li>- Provide a strategy, timetable and tools for information sharing and consultation;</li> <li>- Determine resources and responsibilities;</li> <li>- Describe monitoring, recording and reporting requirements.</li> </ul>	Development of SEP within 4 months after ID 2(a)(ii)	9	PSD & DFCS & CLO
		2(e) Develop a grievance mechanism that will be communicated to locally affected communities and that will contain: <ul style="list-style-type: none"> <li>- a complaints procedure that clearly indicates who is responsible for receiving complaints;</li> <li>- the processes followed for recording and acting on complaints;</li> <li>- the process for following through, communicating and closing complaints.</li> </ul>	Within 4 months after ID 2(a)(ii)	9	PSD & DFCS & CLO
		2(f) Integrate the Social Management Program into the Management System including all plans and procedures developed as part of this Action Plan.	Within 6 months after completion of items ID 2 (a) through (d)	15	CLO
		2(g) Align the Company's Community Relations Strategy <sup>4</sup> with the needs and priorities identified in 2 (c) and 2 (d). Formalize and document a process for decision-making in relation to community assistance and development programs. Develop a mechanism for including the project affected communities in this process.	Within 6 months after completion of Items ID 2(c) and (d)	15	CLO & CRCC

<sup>2</sup> See IFC's [Addressing the Social Dimensions of Private Sector Projects Good Practice Note](#)

<sup>3</sup> See IFC's [Stakeholder Engagement Good Practice Handbook](#)

<sup>4</sup> See IFC's [Investing in People: Sustaining Communities Through Improved Business Practice](#)

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		2(h) Consult with Albpetrol on the retrenchment issue in affected communities in order to better understand and manage expectations on this matter. As part of 2 (g), identify opportunities for collaboration on mitigation measures and initiatives implemented by the Government, EBRD & IFC.	Within 6 months after completion of Items ID 2(c) and (d)	15	DFCS & CLO
<b>Pollution Prevention and Abatement</b>					
3	Bankers Petroleum will assess the implementation of their pollution prevention measures for their current and proposed future operations to improve on existing abatement measures and will implement monitoring programs to measure the effectiveness of these measures for their activities.	3(a) Develop rehabilitation and reinstatement policies, procedures and standards specific to Bankers Petroleum project activities. The procedures and standards used will ensure that proper pre-operational and post-operational activities will be carried out to recognized good international reinstatement practice	Within 6 months after ID 1(b)	12	HSSM & EM
		3(b) Conduct a waste management options assessment that will identify the type and quantity of all waste streams generated during Bankers Petroleum operations. The assessment will assess current methods as well as alternative treatment, reuse and disposal routes for these wastes. It will include the evaluation of a long-term solution for the treatment and disposal of the largest project waste streams: oil contaminated soils, produced sand, drilled cuttings, drilling fluids and contaminated plastics. The outcome of the assessment will be documented.	Within 6 months after ID 1(b)	12	HSSM & EM
		3(c) If there is no appropriate reuse, recycle or disposal option available consideration will be given to the construction of a centralized waste accumulation area for the interim safe storage of wastes.	Within 6 months after ID 3(b)	18	HSSM & EM
		3(d) Develop a project and site specific waste management plan using the results of the waste management options assessment (Action Plan ID 3 (b) above). The plan will contain a waste inventory for all project activities and will document procedures for the classification, labelling, segregation, storage, treatment and disposal methods for each waste stream generated. The waste management plan will also contain a clearly documented Duty of Care mechanism whereby the waste producer will ensure that a waste is properly managed even	Within 6 months after ID 3(b)	18	HSSM & EM

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		after that waste has been transferred to an alternative location or to a third party.			
		3(e) Using the results of the waste management options assessment (Action Plan ID 3 (b) above), alternatives to the disposal of oil contaminated soils and produced sand into the existing “Ecological Pits” will be adopted. Any disposal into disposal pits will be in lined pits in accordance with the pit construction and management measures included in IFC’s EHS Guidelines for Onshore Oil and Gas Development <sup>5</sup> .	Within 6 months after ID 3(b) and development of such alternatives as required	21	HSSM & EM
		3(f) Cooperate with the relevant Government of Albania enterprise or agency responsible for the contents of the existing “Ecological Pits” to facilitate emptying of the contents and disposal of them in accordance with the options developed as part of Action Plan IDs 3 (b) and 3 (e) above.	Within 3 months after ID 3 (b) and (e) above and thereafter until remedied	12-24	PDM, HSSM & EM (GOA – Pre-existing waste from State operator – Agreement required with GOA)
		3(g) Conduct an air quality baseline assessment in the vicinity of operations to assess background levels of key pollutants.	Within 3 months after ID 1(b)	9	EM
		3(h) Conduct an air emissions control assessment for all BPAL operational facilities. Emissions control should consider the approach and measures included in IFC’s EHS Guidelines for Onshore Oil and Gas Development, and assess all possible alternatives to venting. The outcome of the assessment will be documented.	Within 3 months after ID 1(b)	9	EM
		3(i) Carry out an air quality assessment and emissions dispersion model that considers the existing air quality airshed and routine and maximum air emissions from Bankers Petroleum operations to determine maximum ground level ambient concentrations of key pollutants from project operations to assess potential ground level concentrations and the risks (if any) to workforce health and the health of individuals in the local communities. Internationally recognized dispersion models will be used and examples of acceptable emission	Within 3 months after ID 1 (b)	9	EM

<sup>5</sup> Weblink: [IFC Guidelines for Onshore Oil and Gas Development](#)

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		<p>estimation and dispersion modeling approaches are included in IFC's EHS General Guidelines<sup>6</sup>.</p> <p>The results of the assessment and dispersion model will be used to assist in project emissions control and development of specific provisions including the application of additional pollution control measures.</p>			
		<p>3(j) Develop an air monitoring program for Bankers Petroleum operations that is in compliance with Albanian law, IFC standards and guidelines and EBRD requirements and that will adequately assess the effectiveness of Bankers Petroleum air emissions control strategies and allow differentiation of project-related impacts and existing background ambient conditions.</p> <p>The monitoring plan to be developed will include sampling locations, frequency and duration of sample collection and analysis methods. Sampling locations will be determined from the results of the air dispersion modeling carried out (Action Plan ID 3 (i) above).</p>	Within 3 months after ID 3(i)	12	EM
		<p>3(k) Conduct an assessment of current and future facility equipment infrastructure and ensure that appropriate secondary containment structures are in place. Relevant Canadian Heavy Oil Field standards regarding Pads and Single Well Batteries will be considered in the assessment.</p>	Within 9 months after ID 1(b) and	15	EM
		<p>3(l) Develop a ground water and soil monitoring program that is in compliance with Albanian law, IFC standards and guidelines and EBRD requirements. Sampling locations at all existing "Ecological Pits" will be established and in appropriate local community water wells. Groundwater monitoring locations should be selected with the objective of providing representative monitoring data based on the hydrology of the area. The frequency of measurement and the methods used will be in accordance with Good International Industry Practice.</p>	Establish baseline within 3 months of ID 1 (b) and establish monitoring program within 6 months of ID 1 (b)	9-12	EM
		<p>3(m) Ensure hazardous materials handling</p>	Within 6	12	HSSM

<sup>6</sup> Weblink: [IFC General EHS Guidelines](#)

ID	Issue	Actions	Time table	Months from loan approval	Responsibility
		procedures within the HSSE MS are in accordance with IFC EHS General Guidelines and update if required. Development of Vac & LPG truck loading and unloading procedures, and development of hazardous materials storage within the existing HSSE MS	months after ID 1(b)		
<b>Health and Safety</b>					
4	Bankers will build on their strong workforce health and safety record to further enhance their health and safety procedures and increase the protection of the workforce and nearby communities in preparation for future accelerated expansion.	4(a) Update routine workplace monitoring of air quality and noise in line with IFC's EHS General Guidelines.	Ongoing	0	HSSM
		4(b) Conduct a fire and explosion prevention and response risk assessment for current and future operations and implement all recommendations from this assessment. The risk assessment will consider at a minimum: <ul style="list-style-type: none"> <li>- potential ignition sources and adequacy of separation distances between ignition sources and flammable materials;</li> <li>- separation distances between processing facilities and adjacent buildings and accommodation areas;</li> <li>- provision of passive and active fire protection systems;</li> <li>- procedures for loading and unloading operations;</li> <li>- emergency shut down equipment;</li> <li>- the location, type and adequacy of fire detectors, alarm systems and firefighting equipment;</li> <li>- site-specific fire prevention and emergency action plans;</li> <li>- response arrangements and practice including resources to implement a response (including contractors);</li> <li>- provision of fire safety training;</li> <li>- incident frequency, incident investigation, root cause analysis and reporting; and,</li> <li>- fire drill frequency.</li> </ul>	Within 6 months after loan facility approval	9	HSSM
		4(c) Train and develop selected existing operations personnel to form a dedicated on-site fire fighting team that will cover permanent operations facilities in the field and transportation activities.	Within 3 months after ID 4(c)	12	HSSM
		4(d) Conduct a risk assessment to establish requirement for adequate safety zones around Bankers Petroleum facilities to protect the public from dangerous locations and hazardous materials as well as nuisance issues such as noise and odors. The assessment should cover	Within 12 months after loan facility approval	15	HSSM

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		<p>all facilities and operations such as drilling and production facilities as well as tank farms and transportation routes. As well as the risks in the vent of an emergency at the field.</p> <p>Implement safety zones and develop access deterrents if and as required.</p>			
		<p>4(e) Raise public awareness to warn of hazardous locations associated with project operations include clear guidance on access to land.</p>	<p>Within 3 months after ID 4(e)</p>	<p>15</p>	<p>CLO</p>
<b>Emergency Response</b>					
<p>5</p>	<p>Bankers Petroleum will update their current emergency preparedness and response procedures in preparation for future accelerated expansion</p>	<p>5(a) Conduct a risk assessment to assess the consequences, magnitude and frequency of the occurrence of potential critical events in the area of Bankers Petroleum current and planned future activities and update existing emergency response arrangements for the proposed project expansion against the potential major accident risks identified in Action Plan ID 5 (a) above. Assess the emergency response plan to ensure that it addresses</p> <ul style="list-style-type: none"> <li>- emergency preparedness;</li> <li>- response procedures and practice including resources to implement a response(including contractors);</li> <li>- roles and responsibilities;</li> <li>- training requirements and provision of emergency response training;</li> <li>- emergency drill practice schedule.</li> </ul>	<p>Within 12 months after loan facility approval</p>	<p>15</p>	<p>HSSM</p>
		<p>5(b) Develop a specific oil and chemical spill contingency plan that will document spill prevention measures and spill response measures in relation to Bankers Petroleum activities. The plan will address potential oil, chemical and fuel spills from facilities, transport vehicles and loading and unloading operations. The plan should include the contents outlined in IFC's EHS Guidelines for Onshore Oil and Gas Development.</p>	<p>Within 12 months after ID 1(b)</p>	<p>18</p>	<p>EM</p>
		<p>5(c) Train and develop selected existing operations personnel to form a dedicated Emergency Response Team that will cover field operations facilities and transportation activities.</p>	<p>Within 12 months after loan facility approval</p>	<p>24</p>	<p>HSSM</p>

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<b>Land Acquisition</b>					
6	Land acquisition and compensation activities related to Bankers Petroleum activities will be documented.	6(a) Develop a land acquisition and compensation plan as part of a formalized corporate land acquisition process that shall be in line with Albanian laws and EBRD/IFC policy requirements. The plan will include Company policy and procedures for all land acquisition, reinstatement and compensation to land owners and any other land users who are physically or economically displaced. The land acquisition framework will be disclosed locally.	Within 6 months after loan facility approval	9	ECM & CLO
<b>Transportation</b>					
7	Bankers Petroleum will evaluate its transportation activities in preparation for increased production as well as alternative storage and export options.	7(a) Conduct a review and update of the previous transportation risk assessment to ensure adequacy of existing transportation measures for current and future operations with particular emphasis on oil export operations considering current production rates and planned future increases. The risk assessment will consider at a minimum: <ul style="list-style-type: none"> <li>- current and future transportation routes and their proximity to communities, pedestrians and environmentally sensitive areas;</li> <li>- the condition and safety of proposed roads, signage, visibility;</li> <li>- driver training;</li> <li>- condition of vehicles, vehicle maintenance and inspections;</li> <li>- speed limits and control;</li> <li>- journey management;</li> <li>- history of accidents, incident investigation, root cause analysis and reporting; and,</li> <li>- emergency preparedness and response.</li> </ul>	Within 12 months after loan facility approval	15	HSSM
<b>Security</b>					
8	Bankers Petroleum has contracted security arrangements for its facilities. These arrangements will be reviewed in preparation for future accelerated expansion.	8(a) Conduct a security risk assessment for the current and future planned field operations and transportation activities. The risk assessment will consider: <ul style="list-style-type: none"> <li>- the security environment in the area of operations including the possibility of theft, sabotage, social unrest; and</li> <li>- the effectiveness of current security measures in place.</li> </ul>	Within 12 months after loan facility approval	15	DFCS & HSSM
		8(b) Using the results of the risk assessment (Action Plan ID 8 (a) above), develop a security	Within 6 months after	21	DFCS & HSSM

ID	Issue	Actions	Time table	Months from loan approval	Responsibility
		<p>plan and procedures for security contractor monitoring that will ensure adequate security of facilities using an appropriate level of security cover. Procedures will include standard contractual provisions such as training requirements to ensure the appropriate conduct of security personnel. Procedures and training requirements will take into account similar engagement principles and guidelines contained in the UN Code of Conduct for Law Enforcement Officials, the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials and the Voluntary Principles on Security and Human Rights.</p>	ID 8(a)		
		<p>8(c) Assess and consider additional security measures in addition to or instead of controlled access to operational sites such as warning signs, alarms and lighting.</p>	Within 6 months after ID 8(a)	21	DFCS & HSSM
<b>Cultural Heritage</b>					
9	<p>Bankers Petroleum will assess the risks to potential cultural heritage in relation to their planned expansion programs.</p>	<p>9(a) Conduct a cultural heritage risk assessment for the areas of Bankers Petroleum current and proposed future operations. This will include obtaining an expert opinion on the presence of cultural heritage and actions needed to protect it, with emphasis on, but not limited to, the areas proposed for new development. The community engagement process should also include consultation on this matter.</p>	Within 6 months after loan facility approval	9	CRCC & CLO
		<p>9(b) If the risk assessment indicates the potential for cultural heritage to be present in Bankers Petroleum's operational areas, further investigation will be conducted to establish the importance, status and condition of these sites. Chance find procedures will be developed to ensure internationally recognized best practice is being followed in order to either avoid removing any cultural heritage wherever feasible or conduct any removal by the best available technique</p>	Within 6 months after ID 9(a) and in any case prior to continued activity on any identified site	15	CRCC & CLO
<b>Wider Field Remediation</b>					
10	<p>While Bankers Petroleum bears no legal responsibility for past contamination, existing and ongoing pollution in the field represents a significant risk to its</p>	<p>10(a) Take the initial lead in setting up a working group of all parties playing (or likely to play) a key role in the wider remediation and rehabilitation of the legacy pollution in the Patos-Marinze and Kucova oil fields. Working group participants will include representatives of: the relevant Ministries of the Government of Albania,</p>	Prior to loan facility approval	0	GM & PSD

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	operations. Bankers Petroleum would like to work with government and lenders and contribute to wider remediation of the Patos-Marinza field.	Albpetrol, AKBN, EBRD, IFC, and possibly the EU Commission for Albania.			
		10(b) Develop the Terms of Reference for the Working Group	Within 3 months after loan facility approval	6	GM & PSD
		10(c) Reach a formal collaborative agreement within the working group that determines specific actions, roles, and responsibilities for activities to implement a wider remediation and rehabilitation of the oil fields.	Within 9 months after establishment of the working group terms of reference	15	GM & PSD
<b>Future developments</b>					
11	As operations expand outside the existing field and into the Kucova field, Bankers Petroleum will adopt all developed measures for impact and risk assessment and implement the required plans and procedures to eliminate or minimize these risks and impacts in accordance with the Management System.	11(a) Develop site specific baseline studies, E&S assessments and mitigation plans and procedures including all actions as described above in accordance with the Bankers Petroleum's Management System for any new development plans.	Concurrent with establishment of any new formal Plan of Development resulting from a new Evaluation Program		
<b>ESAP Disclosure</b>					
12	Disclosure and update of ESAP	12(a) As part of the SEP Action Plan ID 2 (d) (and in accordance with IFC performance standard 1), progress with the implementation of the actions in this ESAP will be periodically disclosed to the local communities that are potentially affected by project operations and activities.	Annually	N/A	CLO