

Chapter 6 Policy, Legal and Administrative Framework



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6 POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

6.1 Introduction

This chapter provides a high-level description of the regulatory framework of the SCPX Project. The legal regime applying to SCPX is complicated, so this chapter seeks to highlight high-level regulatory context for the proposed Project; it does not provide an exhaustive analysis of all requirements that may be applicable to the SCPX Project and is not a definitive analysis of those provisions that are considered below.

The chapter considers the following:

- National legislation (the Constitution of Georgia, the Agreement between Georgia and the Azerbaijan Republic relating to the Transit, Transportation and Sale of Natural Gas in and beyond the Territories of Georgia and the Azerbaijan Republic through the South Caucasus Pipeline System (“Inter Government Agreement, IGA”) and host government agreement between and among the Government of Georgia and the SCP Participants (“HGA”)
- Selected international and regional conventions
- Selected international standards, practice and guidance, including International Finance Corporation (IFC) policies
- BP corporate policies.

Please note that the descriptions of the HGA and other laws and documents included below are high-level summaries only and are qualified by reference to the full text of the HGA and other documents.

6.2 National Legislation

6.2.1 *The Constitution*

The ‘*Constitution of Georgia*’ (1995, last amended on 15 December 2010) prevails over other national legislation and international agreements. It states the basic rights of people to live in a healthy environment (Article 37 Part 3). It assures that the state shall protect the environment and foster sustainable development (Article 37 Part 4). It establishes a legal framework that guarantees public access to information about the condition of the environment (Article 37 Part 5, Article 41 Part 1).

6.2.2 *Legal Framework applicable to SCPX Project*

The SCPX Project is being implemented within the framework of the IGA and the HGA. The IGA constitutes binding international law as between the contracting States and the HGA constitutes the controlling domestic, or national, law of Georgia governing the SCPX Project.

6.2.3 *The IGA*

Article IV of the IGA states that:

“Each State shall cooperate and coordinate with the others and the applicable Project Investors in the formulation and establishment of uniform technical, safety and environmental standards for the ... capacity expansion (including by way of additional pipeline loopings) ... in accordance with international standards and practices within the Natural Gas pipeline industry (which standards and practices shall be set forth in the applicable Host Government Agreement) and such other requirements as set forth in the relevant Project Agreements, which shall apply notwithstanding any standards and practices otherwise applicable under the domestic law of the respective State.”

It has to be noted that the IGA does not create any direct rights or obligations for SCP Participants or SCPC.

6.2.4 The HGA

In 2001 the HGA was ratified by the parliament of Georgia and it became effective as the prevailing legal regime for SCP (and the SCPX Project) in Georgia. The provisions of the HGA override any inconsistent provisions in national legislation, with the exception of the provisions in the '*Constitution of Georgia*'.

The HGA sets out the obligation for the Project participants to implement certain standards when designing and operating the pipelines. As well as requiring the operator to act as a "prudent operator", the HGA details the applicable environmental, health and safety standards and practices, the main principles of which include:

- An agreement to implement the environmental, health and safety social standards and practices set forth in Appendix 4 notwithstanding conflicting national standards and practices
- If a release of natural gas occurs, the SCPX participants will take all necessary action to remedy harm and restore land and other harmed matters to their prior condition regardless of fault or causation as set forth in Appendix 4.

Environmental standards

Appendix 4 of the HGA defines the 'environmental standards' applicable to the construction and operation of the Project. These state that the pipeline and facilities shall:

- *"conform to the World Bank environmental standards and practices (such standards and practices to be described in the EIA) and those standards and practices set forth in this Appendix 4,*
- *as well as those generally observed by the international community with respect to Natural Gas pipeline projects comparable to the Project,*

Provided that in no event shall such standards be less than those applicable in the United Kingdom."

Social standards

The HGA states that the Project:

- *"must use its best endeavours to minimise potential disturbances to surrounding communities and the property of the inhabitants*
- *must also complete a social impact assessment of its activities. The impact assessment shall be in general conformance with World Bank standards (excluding the prescribed time periods for review and consultation)."*

Health and safety standards

The HGA states that the Project should:

- *"conform to the standards and practices generally observed by the international community with respect to Natural Gas pipeline projects comparable to the Project,*

Provided that in no event shall such standards be less than those applicable in the United Kingdom."

Environmental strategy product

The HGA also sets out requirements for:

Commissioning a recognised independent international environmental consulting firm to prepare an environmental strategy product, which must be in accordance with the environmental standards above, comprising:

- A scoping study and environmental risk assessment before selection of the general location of the facilities
- A baseline study including:
 - A desk study review of the relevant and available information
 - A field survey to audit relevant existing operations and practices and collect relevant environmental data from the areas surrounding the location of the facilities
- An environmental impact assessment in accordance with the principles of EU Directive 85/337/EEC (as amended by EC Directive 97/11/EC)
- An emergency response plan
- Consultation between the international environmental consultant preparing the environmental strategy product and the government's official and technical representatives during the preparation of the baseline study, environmental impact assessment and emergency response plan
- Making the draft EIA available in a public place for 60 days for review and comments
- Submitting a final EIA for official approval
- Implementing mitigation measures and a monitoring programme that is updated as required.

The HGA is supplemented by Presidential Decree No. 151 (24 April 2001) that appoints the Georgian International Oil Corporation (GIOC) as the sole authorised representative of the Georgian state in oil and gas transportation projects from the Caspian Sea. GIOC has signing authority on behalf of the Georgian state for all agreements, contracts and other documents related to implementation of oil and gas transportation projects. GIOC has since been re-named the Georgian Oil and Gas Corporation (GOGC).

Additional requirements

The HGA also sets forth the overall framework for the Government granting exclusive and unrestricted rights to the SCPX participants in respect of state land, and the power to enter into private arrangements and compensation agreements to use, possess, control and construct upon non-state land, and the terms under which SCPX can expropriate non-state land. It also requires SCPX to maintain means of access and construct temporary crossings that may be reasonably required by affected landowners and occupiers, and to reinstate private roads and footpaths to their original condition after construction.

The HGA requires that employees hired in connection with the Project will have written employment contracts that specify the hours of work required of the employees and the compensation and benefits to be paid. All employment practices (e.g. hours of work, leave, remuneration, fringe benefits and occupational health and safety standards) applicable to citizens of Georgia must be at least as stringent as the requirements provided for in Georgian labour legislation. SCPX participants and contractors shall give preference to Georgian suppliers of services, equipment, materials, machinery and tools, vehicles, spare parts, goods and supplies, where they are of the same price, quality and availability as those offered by other suppliers.

The HGA also specifies a variety of technical standards that the Project must apply to the pipeline and facility design.

6.3 International Standards and Guidelines

The HGA requires the SCPX participants to:

Create the environmental strategy product and implement the environmental strategy reflected therein in accordance with:

- World Bank environmental standards and practices
- Standards and practices generally observed by the international natural gas pipeline industry for comparable projects.

The combination of World Bank and international standards and practices shall be no less stringent than those applied in the United Kingdom.

World Bank standards

The SCPX Project has reviewed the following sources of information as representative of World Bank (WB) standards to assist with defining potential Project impacts and mitigation measures:

- International Finance Corporation (IFC)¹ Performance Standards (2012) and Environmental, Health and Safety (EHS) Guidelines.

Selected IFC Performance Standards and General EHS and Sector Guidelines, which the Project considers as having some relevance, are listed in Table 6-1 and Table 6-2 below.

International industry standards and practices

SCPX has also undertaken a review of a range of potentially useful international standards and practices relating to the international gas pipeline industry, including:

- World Health Organisation (WHO) guidelines
- Guidance issued by oil and gas industry associations
- Practice and standards in the UK and other European Union jurisdictions
- General industry practice.

UK standards and practices

As per the HGA requirements the Project also reviewed standards and practices in the UK and EU (as representative of UK requirements) to help determine whether the standards and practices being proposed were considered no less stringent than those applied in the UK.

Table 6-1: IFC Performance Standards

Performance Standard	Subject	Key Principle
1	Social and Environmental Assessment and Management Systems	Environmental and social impacts should be assessed Negative impacts should be avoided, minimised or compensated Communities should be engaged on issues that affect them Management systems should be used to improve performance
2	Labour and Working Conditions	Workers should have fair treatment, non-discrimination and equal opportunities There should be no child labour or forced labour Working conditions should be healthy and safe

¹ The IFC is the private lending arm of the World Bank Group

Performance Standard	Subject	Key Principle
3	Pollution Prevention and Abatement	Impacts on health and the environment should be avoided by minimising pollution Greenhouse gas emissions should be reduced
4	Community, Health, Safety and Security	Impacts on the health and safety of local communities should be minimised Personnel and property should be safeguarded in a way that avoids risks to the community's security
5	Land Acquisition and Involuntary Resettlement	Involuntary resettlement should be minimised People affected by land acquisition should be properly informed and compensated The livelihoods and living standards of displaced people should be restored or improved
6	Biodiversity Conservation and Sustainable Natural Resource Management	Biodiversity should be protected and conserved Natural resources should be managed sustainably
8	Cultural Heritage	Cultural heritage should be protected from negative impacts and preserved The benefits from business in cultural heritage should be shared

Table 6-2: Relevant IFC EHS Guidelines

Guideline	Content
IFC Environmental, Health, and Safety Guidelines for Onshore Oil and Gas Development (April 2007)	Technical reference document that addresses onshore oil and gas exploration, drilling and production operations
IFC Environmental, Health, and Safety Guidelines for Thermal Power Plants	Technical reference document that addresses thermal power plants with a total rated heat input capacity above 50 megawatt thermal input (MWth)
IFC General EHS Guidelines 1.1 Air Emissions and Ambient Air Quality (April 2007)	This section provides an approach to the management of significant sources of emissions, including specific guidance for assessment and monitoring of impacts. It provides additional information on approaches to emissions management in projects located in areas of poor air quality
IFC General EHS Guidelines 1.2 Energy Conservation (April 2007)	This section provides providing information about common techniques for energy conservation
IFC General EHS Guidelines 1.3 Wastewater and Ambient Water Quality (April 2007)	This section provides information on common techniques for wastewater management, water conservation, and reuse
IFC General EHS Guidelines 1.4 Water Conservation (April 2007)	Water conservation programmes and measures
IFC General EHS Guidelines 1.5 Hazardous Materials Management (April 2007)	Hazardous materials management to avoid or, when avoidance is not feasible, minimise uncontrolled releases of hazardous materials or accidents (including explosion and fire) during their production, handling, storage and use
IFC General EHS Guidelines 1.6 Waste Management (April 2007)	Principles for general waste management as well as specific guidance for dealing with hazardous waste
IFC General EHS Guidelines 1.7 Noise (April 2007)	Addresses impacts of noise beyond the site boundary including prevention and control, noise level guidelines for different receptors; and monitoring
IFC General EHS Guidelines 1.8 Contaminated Land (April 2007)	Management approaches to land contamination owing to anthropogenic releases of hazardous materials, wastes, or oil, including naturally occurring substances
IFC General EHS Guidelines 3 Community Health and Safety (April 2007)	These address project activities taking place outside of the traditional project boundaries, but nonetheless related to the

Guideline	Content
2007)	project operations, including: Water Quality and Availability, Traffic Safety, 3.5 Transport of Hazardous Materials, 3.6 Disease Prevention, 3.7 Emergency Preparedness and Response
IFC General EHS Guidelines 4 Construction and Decommissioning (April 2007)	These provide additional, specific guidance on prevention and control of community health and safety impacts that may occur during new project development, at the end of the project or due to expansion or modification of existing project facilities. The environment section (4.1) includes topics such as noise and vibration, soil erosion, air quality, solid waste, hazardous materials, wastewater discharges and contaminated land. The Community Health and Safety Section (4.3) includes topics such as general site hazardous, disease prevention and traffic safety

6.4 International and Regional Conventions

International conventions come into effect through national legislation and therefore do not directly apply to SCPX, which is only obliged to comply with the terms of the HGA.

SCPX has considered the provisions of selected conventions, not specific to the oil and gas sector, on major environmental issues during development of the Project and preparation of the ESIA, taking into account whether they may contain useful guidance, including regarding potential mitigation measures and international practice.

Some of the key conventions on air quality and climate change, biodiversity and protection of ecology and habitats, cultural heritage, public consultation and waste management are listed in Table 6-3 below, together with a note, for information only, on whether the Georgian government has signed, acceded or ratified² them.

Table 6-3: Relevant International and Regional Agreements

Title	Status in Georgia
UN Framework Convention on Climate Change (UNFCCC)	Ratified 1994
Kyoto Protocol to UNFCCC	Ratified 1999
Montreal Protocol on Substances that Deplete the Ozone Layer (and its London, Copenhagen, Montreal and Beijing Amendments)	Acceded 1996 (Amendments 2000 and 2011)
Vienna Convention for the Protection of the Ozone Layer	Acceded 1996
Geneva Convention on Long-Range Transboundary Air Pollution	Acceded 1999
Stockholm Convention on Persistent Organic Pollutants	Ratified 2006
Ramsar Convention on Wetlands of International Importance especially as Wildfowl Habitat	Acceded 1997
Rio Convention on Biological Diversity	Acceded 1994
Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)	Ratified 1994
Convention on Migratory Species	Ratified 2000
Paris Convention Concerning the Protection of the World Cultural and Natural Heritage	Acceded 1992
International Convention to Combat Desertification	Ratified 1999
Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal	Acceded 1999
Aarhus Convention on Access to Information, Public Participation in	Ratified 2000

² Signing expresses an intention in principle to become a party to a convention; ratification or accession legally obliges the ratifying state to apply the convention.

Title	Status in Georgia
Decision-Making and Access to Justice in Environmental Matters	
Geneva Convention concerning Minimum Age for Admission to Employment	Ratified 1996
ILO Social Policy (Basic Aims and Standards) Convention	Ratified 1997
European Convention for the Protection of Human Rights and Fundamental Freedoms	Ratified 1999
Universal Declaration of Human Rights	Ratified 1933
Geneva Convention concerning Employment Policy	Ratified 1993
Forced Labour Convention	Ratified 1997
Holidays with Pay Convention	Ratified 1997
Freedom of Association and Protection of the Right to Organise Convention	Ratified 1997
Employment Service Convention	Ratified 1999
Right to Organise and Collective Bargaining Convention	Ratified 1993
Equal Remuneration Convention	Ratified 1996
Abolition of Forced Labour Convention	Ratified 1996
Discrimination (Employment and Occupation) Convention	Ratified 1993
Social Policy (Basic Aims and Standards) Convention	Ratified 1997
Employment Policy Convention	Ratified 1993
Minimum Age Convention	Ratified 1996
Human Resources Development Convention	Ratified 1993
Labour Relations (Public Service) Convention	Ratified 2003
Private Employment Agencies Convention	Ratified 2002
Worst Forms of Child Labour Convention	Ratified 2002

6.5 National Legal and Administrative Framework

Georgia is divided into nine regions, which are subdivided into administrative districts. There are also two autonomous republics (Adjara and breakaway Abkhazia) and the breakaway autonomous district of Akhgori that were established during the soviet regime. All central government bodies, except the Constitutional Court and National Commission on Energy Regulation, are located in Tbilisi, Georgia's capital city. The local executive bodies perform the main administrative functions in each district.

A variety of government bodies share responsibility for environmental and social issues. The following organisations are particularly relevant to the SCPX Project:

- Ministry of Economy and Sustainable Development (MoESD), which is in charge of issuing construction permits
- Ministry of Environment Protection (MoE), which is in charge of issuing environment impact permits and the conduct of ecological expertise
- Ministry of Energy and Natural Resources (MoENR), which is responsible for issuing of mineral extraction licences, forest use permits and tree-felling agreements
- Ministry of Culture and Monument Protection (MoC), which is in charge of issuing permits for archaeological excavations and provides expert opinion on cultural heritage issues.

6.5.1 National Legislation and Permitting Requirements

National laws are not strictly applicable to the SCPX Project as it is governed by the HGA, which supersedes national regulatory requirements. Pursuant to Article 12.1 of the HGA the applicable environmental, health, safety and social standards and practices for the Project shall be as set forth in Appendix 4 attached hereto and shall be applicable notwithstanding any conflicting standards and practices otherwise required or approved by national legislation.

The environmental standards and practices described in the HGA and its Appendix 4, however, do not include the regulatory administrative structure or procedures (including those for licensing, permitting and regulatory approvals) and for those the Project shall refer to national legislation. The Project also intends to apply the following national legislation on environmental impact assessment, it being understood that such national legislation on environmental impact assessment and the relevant permitting processes stated below shall apply to the extent they do not conflict with the HGA requirements and the Project environmental standards that have been defined in accordance with the HGA.

6.5.2 Environmental Impact Assessment

The Georgian Law requirements and procedures for EIA are set out in the Law of Georgia on Environmental Impact Permits (EIP) 2007 (as amended) and the Environmental Impact Regulations 2011.

The 2007 EIP Law defines the list of activities subject to ecological expertise, which includes oil and gas pipelines (Chapter II, Article 4, Paragraph 1e). The Law requires developers to develop and submit an EIA document along with other documentation, which is then subject to state 'ecological expertise' (examination). Assuming the state review is favourable, a permit is issued by the Ministry of Environment Protection. This is an essential pre-requisite for issue of a construction permit (described below).

6.5.3 Permit Requirements

The SCPX Project will also be required to obtain a number of permits and consents, of which the main permits and the implementing national legislation are described in Table 6-4. The Law on Licences and Permits governs the issue of all permits and consents. Subject to satisfaction of application requirements, all the permits are issued within 30 days from application submission.

Construction permit

The Law on Licences and Permits defines protocols for the issue, amendment and withdrawal of permits. For projects such as the SCPX Project, a construction permit is needed. The responsible authority (the Ministry for Economy and Sustainable Development) must obtain the following approvals before it will grant a construction permit:

- Geological conclusions to be issued by National Environmental Agency
- Cultural heritage clearance to be issued by National Agency of Cultural Heritage
- ESIA approval (ecological expertise) to be issued by MoE
- Project design approval to be issued by MoESD
- Project's registered rights to land.

The conclusion of the ecological assessment (i.e. MoE expert examination of the EIA) is a part of the construction permit and its recommendations are compulsory for the developer.

Table 6-4: Permit Register

Permit Required Activity	Permit Title	Issuing Authority	Application Requirements	Project Phase	Implementing Law
Construction activities	Construction permit	Ministry of Economy and Sustainable Development	Geological conclusions; Cultural heritage clearance; Conclusion of local independent expertise on final design; ESIA approval; Final design; Rights to Land	Pre-construction	Law No.1775 on Licenses and Permits; Government Resolution N57 "On Terms and Conditions of

Permit Required Activity	Permit Title	Issuing Authority	Application Requirements	Project Phase	Implementing Law
					issuance of Construction Permit"
Construction activities	ESIA approval	Ministry of Environment Protection (MoE)	Baseline study approval; Public disclosure; Finalisation of ESIA by addressing public comments	Pre-construction	Law No.519 on Environmental Protection Law No.5603 on Ecological Expertise Order No.515 of Minister of Environmental Protection and Natural Resources on Rules of Conduction of Ecological Expertise
Construction activities	Cultural heritage clearance	National Agency of Cultural Heritage	Desktop study; Archaeological survey; Monuments survey; archaeological excavations if required; Cultural heritage impact report	Pre-construction	Law No 4708 "On Cultural Heritage"
Construction activities	Visual geological-engineering conclusion	National Environmental Agency	Maps of construction sites	Pre-construction	Government Resolution N57 "On Terms and Conditions of issuance of Construction Permit"; Order N7 of the Minister of Environment Protection
Construction activities	Conclusion on mineral deposits	National Environmental Agency	Maps of construction sites	Pre-construction	Order N7 of the Minister of Environment Protection
Construction activities	Conclusion of local independent expertise on final design	TBA	Final design and payment for expertise service	Pre-construction	Government Resolution N57 "On Terms and Conditions of issuance of Construction Permit"

Permit Required Activity	Permit Title	Issuing Authority	Application Requirements	Project Phase	Implementing Law
Tree felling in state forest lands for ROW and permanent facilities	Forest use agreement	Ministry of Energy & Natural Resources	Pre-entry survey by applicant and local forestry, detailed forest inventory report by applicant	Construction	Law No.2124 on Forestry Code of Georgia; Resolution No.242 of Government of Georgia on Approval of Rules for Forest Use Resolution No.132 of Government of Georgia on Approval of Regulations on Rules and Conditions of Issuance of Forest Usage License
Tree felling in state forest lands for Temporary Facilities	Forest use agreement	Ministry of Energy & Natural Resources	Pre-entry survey by applicant and local forestry, detailed forest inventory report by applicant	Construction	Resolution No.242 of Government of Georgia on Approval of Rules for Forest Use; Order N10/61 of the Chairman of State Department of Forestry
Construction material extraction from borrow pits	Mineral extraction licence	Ministry of Energy & Natural Resources	Extraction project and payment for minerals without auction per fair market price	Construction	Decree of the Government of Georgia N136 of August 11, 2005; Law N 946 "On Fees for Use of Natural Resources"
Underground water abstraction	Mineral extraction licence	Ministry of Energy & Natural Resources	Extraction project and payment for minerals without auction per fair market price	Construction	Decree of the Government of Georgia N136 of August 11, 2005; Law N 946 "On Fees for Use of Natural Resources"
Water abstraction from river, lake	Surface water abstraction approval	MoE	Surface water abstraction project	Construction	Order of the Minister of Environment Protection & Natural Resources N745; Order of the Minister of Environment Protection N 16

Permit Required Activity	Permit Title	Issuing Authority	Application Requirements	Project Phase	Implementing Law
Treated sewerage, hydro-test water etc. discharge into river, lake	Approval of liquid discharge into surface water body	MoE	Technical inventory report and project of discharge limits.	Construction	Order of the Minister of Environment Protection & Natural Resources N745; Order of the Minister of Environment Protection N 16
Exhaust from stationary sources	Air emission limit approval	MoE	Technical inventory report and project of emission limits	Construction	Order of the Minister of Environment Protection & Natural Resources N745; Order N667 of the Minister of Environment Protection and Natural Resources; Law "On Ambient Air Protection"
Emergency response measures for gas leak or emission	Emergency response plan approval	GOGC, Ministry of Energy & Natural Resources	Emergency response plan	Operations	Law No 4922 "On Protection of Population and Territory"; Order of the President of Georgia N 415
Use of two-way radios, radio stations etc.	Allocation of radio frequencies	Georgian National Commission of Communications	Equipment specifications and coverage locations	Pre-construction/ Construction	Law No 1514 "On Electronic Communications"; Law No.1775 "On Licenses and Permits"; Regulations of International Telecommunication Union, Chapter 5; General Administrative Code
Construction or upgrade of access roads	Approval of construction or upgrade activities	Ministry of Infrastructure and local municipalities	Construction or upgrade project.	Pre-construction/ Construction	Government Resolution N57 "On Terms and Conditions of issuance of Construction Permit"
Transportation of oversized and overweight cargo	Transportation permit	Ministry of Internal Affairs (MoIA)	Contract with Security Police for escort service, consent from Georgia Railway Ltd for railway crossings, potential routes and list of transport and equipments	Pre-construction/ Construction	Joint Order N956/1-1/746 of the Minister of Internal Affairs and Minister of Economic Development; Law N 700 "On Road Transport"; Law "On Road Traffic"

Permit Required Activity	Permit Title	Issuing Authority	Application Requirements	Project Phase	Implementing Law
Spoil disposal	Spoil disposal approval	MoE	Site and spoil descriptions.	Construction	Law "On Subsoils", May 8, 2012
Import of goods	Customs clearance	Ministry of Finance	Certificate of origin and specifications	All	Tax Code of Georgia; Decree of the Government of Georgia N420
Import of explosives	Permit to import explosives	MolA	Certificate of origin and specifications, purpose, duration	Construction	Tax Code of Georgia; Decree of the Government of Georgia N420; Law N2911 "On Control of Technical Hazard"; Order N 1-1/2502 of the Minister of Economy and Sustainable Development
Use of explosives	Permit to use explosives	MoEc	Specifications, storage and transportation details, scope of work	Construction	Tax Code of Georgia; Decree of the Government of Georgia N420; Law N2911 "On Control of Technical Hazard"; Order N 1-1/250 2 of the Minister of Economy and Sustainable Development
Import of radioactive materials	Permit to import radioactive materials	Emergency Department of MolA/MoE	Certificate of origin and specifications, purpose, duration	Construction	Law N1674 "On Nuclear and Radioactive Safety"; Resolution N135 "On Approval of Regulations on Rules and Conditions for Issuance of Nuclear & Radiation Activity, Law "On Licenses and Permits".

Permit Required Activity	Permit Title	Issuing Authority	Application Requirements	Project Phase	Implementing Law
Use of radioactive materials	Permit to use radioactive materials	MoE	Specifications, storage and transportation details, scope of work	Construction	Law N1674 "On Nuclear and Radioactive Safety", Order N42/N of the Minister of Labor, Healthcare and Social Affairs on Approval & Basic Rules of Handling Radioactive materials and other Sources of Ionizing Radiation"

6.6 Project Environmental Standards

Based on a review of the guidance noted in Section 6.3, SCPX has developed the following Project standards in accordance the HGA requirements:

- Discharge standards listed in:
 - Table 6-5 for sanitary sewage
 - Table 6-6 for industrial wastewater (to include process and hydrotest wastewater)
 - Table 6-7 for ambient water quality. These standards are further discussed in Chapter 7 as their applicability is dependent on the results of the baseline studies
 - Table 6-8 (and supporting text) for noise
 - Table 6-9 for vibration
 - Table 6-10 for atmospheric emissions
 - Table 6-11 for ambient air quality
 - Section 6.6.4 for remediation.

The World Bank, WHO and EU/UK standards also specify various design and other mitigation measures for minimising impacts and these have been considered and adopted as relevant, see Chapter 10 and the ESMMP in Appendix D.

6.6.1 Project Standards for the Discharge of Sanitary Discharges

These standards apply at the point of discharge of treated sanitary discharges to a surface watercourse.

Table 6-5: Proposed SCPX Discharge Standards for Sanitary Sewage

Parameter	Project Standard
pH	6-9
Biological oxygen demand (BOD) (5) (mg/l)	25
Chemical oxygen demand (COD) (mg/l)	125
Total nitrogen (mg/l)	10*
Total phosphorous (mg/l)	2*
Oil and grease (mg/l)	10

Parameter	Project Standard
Total suspended solids (TSS) (mg/l)	35
Coliform bacteria (Most probable number)/100 ml	400
Temperature	No increase greater than 3°C of ambient temperature at the edge of a scientifically established mixing zone

Reference: IFC 'General EHS Guidelines', 2007: Environmental, Section 1.3; Reference: EU Urban Wastewater Treatment Directive (1991) and UK Urban Waste Water Treatment Regulations (1995)

* Phosphorous and nitrogen standards to be applied based on the results of a risk assessment to identify if the receiving environment is vulnerable to eutrophication and critical levels could be exceeded

Refer to Section 6.6.2 for details of discharge of sanitary waste to land.

6.6.2 Project Standards for Discharge of Industrial Wastewater

Industrial wastewater refers to all controlled discharges including process, industrial, hydrotest and managed storm water run-off. These standards apply at the point of discharge of industrial wastewater to a surface watercourse.

Table 6-6: Proposed SCPX Discharge Standards for Industrial Wastewater (Including Process and Hydrotest Wastewater)

Parameter	Proposed SCPX Standard
pH	6-9
BOD (5) (mg/l)	25
COD (mg/l)	125
Oil and grease: (mg/l)	10
Total hydrocarbon content (mg/l)	10
Phenols (mg/l)	0.5
Total suspended solids (TSS) (mg/l)	35
Sulphides (mg/l)	1
Chlorides (mg/l)	600mg/l (average), 1200mg/l (maximum) or change the salinity by no more than 5%
Temperature	Levels should be as low as practical and reflect the quality of the receiving waters Change the temperature of the receiving water by no more than 1°C, Upper temperature limit for a discharge is 40°C
Heavy metals (total) (mg/l)	5

Reference: IFC Environmental, Health, and Safety Guidelines for Onshore Oil and Gas Development (April 2007); UK Refining Sector Guidance Note EPR 1.02

Discharge to land

Soakaways shall only be used for treated sanitary, storm water or potentially hydrotest water discharges. Potential impacts on soil, groundwater and surface water shall be evaluated in all situations where effluent is discharged to land. For soakaways, the standards in Table 6-5 and Table 6-6 shall apply where the effluent reaches the water. Ensuring the discharge has no more than a minor impact to water resources will require a two-phased investigation:

- In the first instance the capacity of the ground to physically accommodate the water flows will be investigated. Trial pits will be excavated and percolation tests will be undertaken of the surface strata at the site to establish their characteristics (porous versus fissured) in terms of capacity to accommodate the waste flows.

- Secondly, a risk assessment will be undertaken to establish potential impacts to the nearest groundwater resource. The approach using analytical solutions similar to those recommended by UK Environment Agency (as referenced in 6.6.4) shall be used.

6.6.3 Project Ambient Surface Water Quality Standards

Standards are to be selected depending on the type of receiving watercourse.

Table 6-7: Proposed SCPX Ambient Surface Water Quality Standards

Parameter	Unit	EQS Salmonid Waters	EQS Cyprinid Waters
pH*		6-9	6-9
BOD (5)	mg/l	≤ 3	≤ 6
Total hydrocarbon content		Petroleum products must not be present in water in such quantities that they: - form a visible film on the surface of the water or form coatings on the beds of watercourses and lakes - impart a detectable "hydrocarbon" taste to fish - produce harmful effects in fish	
Phenols		Not present in concentrations that adversely affect fish flavour	
Total suspended solids (TSS)*	mg/l	≤ 25	≤ 25
Nitrites (mg/l NO ₂)	mg/l	≤ 0.01	≤ 0.03
Dissolved Cu Assuming water hardness of 100mg/l CaCO ₃	mg/l	≤ 0.04	≤ 0.04
Zn mg/l (assuming water hardness of 100mg/l CaCO ₃)	mg/l	≤ 0.3	≤ 1.0
Dissolved oxygen (mg/l O ₂)	mg/l	50% of the time ≥ 9, 100% of the time ≥ 7	50% of the time ≥ 8, 100% of the time ≥ 5
Non-ionised ammonia mg/l NH ₃	mg/l	≤ 0.005	≤ 0.005
Total ammonium (mg/l NH ₄)	mg/l	≤ 0.04	≤ 0.2
Total residual chlorine (mg/l HOCl)	mg/l	≤ 0.005	≤ 0.005

*Derogations from this standard are possible if, for example, exceptional weather or natural enrichment occurs. Note: Where existing water quality levels are identified as exceeding the above standards prior to Project start-up (perhaps caused by non-Project emissions sources) then the Project may not be able to meet these standards owing to factors outside of the Project's control. In these circumstances the Project will consider the water quality levels and, taking into account the non-Project factors affecting water quality, will take reasonably practicable steps to reduce the Project's contribution to water emissions. The Project will continue to comply with the above discharge standards in Table 6-5 and Table 6-6.

Reference: EU Freshwater Fish Directive (2006/44/EC) Salmonid Waters - waters which support or become capable of supporting fish belonging to species such as salmon, trout, grayling or whitefish. Cyprinid waters: waters that support or become capable of supporting fish belonging to the cyprinids or other species such as

pike, perch and eel. Standards will be applied as applicable (depending on the range of species supported by a surface watercourse).

6.6.4 Project Remediation Standards

The Project will apply a risk assessment approach to contaminated land management to evaluate the potential impact of soil, surface water or groundwater contamination on local receptors. This will follow the methodology from the UK Environment Agency's approach as defined in:

- *Model Procedures for the Management of Contaminated Land* (CR11) (Environment Agency, 2004)
- 'Remedial Targets Methodology: Hydrogeological Risk Assessment for Land Contamination' (Environment Agency, 2006).

This is based on the source–pathway–receptor principle, which seeks to establish the linkages between the pollutants and the receptor, and whether harm to health or the environment is likely to occur. This approach does not specify defined clean-up standards as these depend on the land/water use and the presence of pathways to potential receptors.

This method follows a tiered approach to risk assessment, where the need for a further more detailed analysis is determined in the first tier and during subsequent risk assessment tiers the data requirements and the sophistication of the analysis increase, and the confidence in the predicted impact also increases.

If the risk assessment demonstrates that risk to health or the environment exists a remediation plan will be developed. This may include the development of remedial targets which can be based on information from a variety of sources which may include WHO guidelines, EU or UK standards and guidelines or other national standards and guidelines as appropriate.

6.6.5 Project Ambient Noise Standards

Permanent noise sources

The standards below apply to the noise emissions from the permanent facilities (CSG1, CSG2 and PRMS) during normal operation. Noise from the permanent facilities shall not exceed the levels in the table below, when measured at the nearest residential receptor.

Table 6-8: Proposed SCPX Guidelines for Noise (Permanent Noise)

Noise Limit ¹ (applies at receptors)	dB(L _{Aeq})
Free-field rating level (L _{Ar,Tr}) ² Daytime (07:00–23:00)	50
Free-field rating level (L _{Ar,Tr}) ^{2,3} Night time (23:00–07:00)	42
Façade of bedrooms (L _{Amax, fast}) at night (23:00–07:00)	60
Free-field rating level (L _{Ar,Tr}) will not exceed background by greater than 3 dB where background already exceeds the absolute limits	

¹ These limits do not apply to emergency or unforeseen events.

² L_{Ar,Tr} = free-field rating level, site noise only plus tonal correction

³ The UK guidance specifies this as a façade level of 45 dB(A); to maintain consistent units this has been adjusted to free field.

Reference: IFC 'General EHS Guidelines', 2007: Environmental, 1.7; UK; IPPC H3 (Part 1 and 2) Horizontal Guidance Note (2002 and 2004).

Semi-permanent noise sources

The standards above (Table 6-8) apply to permanent Project facilities and not construction activities. The Project has voluntarily taken the decision to aim to achieve these standards at the construction camps which, although temporary facilities, may generate noise continuously for the duration of their use. For example, power generation equipment may run continuously for the duration of the camp operation. The above noise standards shall apply at sensitive receptors in the vicinity of the construction camps. These standards do not apply to any other construction activities.

Temporary noise sources

During construction, noise emissions shall be assessed in accordance with BS5228-1 (2009), E3.3. Example Method 2: 5 dB(A) change. As stated by this method, the following noise standards shall apply to noise-generating construction activities with a duration of one month or longer.

Noise levels generated by construction shall not increase the pre-construction ambient noise by 5 dB or more, subject to lower cut-off values of 65 dB, 55 dB and 45 dB LA_{eq, Period}, from construction noise alone, for the daytime, evening and night-time periods, respectively.

For short duration noise-generating activities at construction sites, less than one-month duration, e.g. nitrogen venting, the above standards shall be met where possible, despite not being strictly applicable. However, in the event that noise levels are predicted to exceed these levels a risk assessment shall be carried out to understand the predicted noise levels, the duration that the levels will be exceeded and potential mitigation measures which will be applied to help ensure the noise is as low as practicable.

6.6.6 Project Vibration Standards

Table 6-9: Project Vibration Standards

Standard	Receptor	Vibration limits mms⁻¹ (ppv)
British Standard 5228, 2009 Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration	Humans in buildings	1.0 mms ⁻¹ It is likely that vibration of this level in residential environments will cause complaint, but can be tolerated if prior warning and explanation has been given to residents. 10 mms ⁻¹ Vibration is likely to be intolerable for any more than a very brief exposure to this level.
British Standard 5228, 2009 Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration	Unreinforced or light framed structures Residential or light commercial type buildings	Limits above which cosmetic damage to buildings could be caused: 15mms ⁻¹ at 4Hz increasing to 20mms ⁻¹ at 15Hz increasing to 50mms ⁻¹ at 40Hz and above

Refer to British Standards identified for further information

Note: Where existing background vibration levels are identified as exceeding the above standards prior to Project start-up (perhaps caused by non-Project sources) then the Project may not be able to meet these standards due to factors outside of the Project's control. In these circumstances the Project will consider the vibration levels and, taking into account the non-Project factors affecting vibration, will take reasonably practicable steps to reduce the Project's contribution to vibration.

6.6.7 Project Air Emission Standards

These standards apply at the point of discharge, i.e. the emission stack.

Table 6-10: Proposed SCPX Atmospheric Emissions Limit Values

Emissions Source	SCPX Project Standard			Reference
	Air Emission Limit Values (daily averages in mg/Nm ³ dry gas, at Standard Temperature and Pressure of 273K and 101.3kPa)			
	NO _x	CO	PM	
Turbine compressor driver (15% O ₂)	50*	100*	5	UK/EU ¹
Power generation turbine (15% O ₂)	340	100	5	UK/WB ⁴
Water bath heater (3% O ₂)	140	50	5	UK ^{2,3}

All values apply under normal operating conditions (i.e. excluding start-up, shut-down and process upset conditions); *limits apply above 70% load

Reference: 1 EU Industrial Emissions Directive (2010); 2 UK EPR Sector Guidance 1.01(2009); 3 UK Process Guidance Note 1/3(95); 4 BAT approach aligned with Reference 2 and IFC General EHS Guidelines (2007);

Combustion equipment used within construction, and yet to be defined, shall meet the relevant standards within IFC General EHS Guidelines (2007).

6.6.8 Project Ambient Air Quality Standards

Table 6-11: Proposed SCPX Project Standard – Ambient Air Quality

Parameter	Proposed SCPX Project Standard	Source of SCPX Standard
NO ₂	40µg/m ³ annual average (human health) 30µg/m ³ annual average (ecosystems) ¹ 200µg/m ³ hourly average	WHO WB ³ /UK ² UK ² WHO ³ /WB
Benzene	5 µg/m ³ annual average	UK ²
CO	100,000µg/m ³ for 15 minutes 60,000µg/m ³ for 30 minutes 30,000µg/m ³ for 1 hour 10,000µg/m ³ maximum daily 8-hour average	WHO ⁴ WHO ⁴ WHO ⁴ WHO ⁴ WHO ⁴ /UK ²
PM ₁₀	20µg/m ³ annual average 50µg/m ³ 24hr average (not to be exceeded more than 3 days a year, 99th percentile)	WHO/WB ³ WHOWB ³
PM _{2.5}	10µg/m ³ annual average 25µg/m ³ 24hr average	WHO/WB ³ WHO/WB ³

Note: Where existing ambient air quality levels are identified as exceeding the above standards prior to Project start-up (perhaps caused by non-Project emissions sources) then the Project may not be able to meet these standards due to factors outside of the Project's control. In these circumstances the Project will consider the ambient air quality levels and, taking into account the non-Project factors affecting air quality, will take reasonably practicable steps to reduce the Project's contribution to air emissions.

Reference: 1. The air quality objectives for ecosystems should apply more than 20km from an area with a population of more than 250,000 and more than 5km away from industrial sources, motorways and built-up areas of more than 5000 people.

2. UK Air Quality Standards Regulations 2010, UK Air Quality Strategy and UK Environment Agency H1 Environmental Risk Assessment Guidance, Annex F, Air Emissions

3. WHO, Air Quality Guidelines Global Update, 2005; IFC General EHS Guidelines (2007)

4. WHO Air Quality Guidelines for Europe, 2nd Edition, 2000

6.7 BP Corporate Policy

BP is a partner in the SCP Company (consisting of a number of partner organisations) and is the technical operator of SCP (Statoil is the commercial operator). The SCPX Project will be built and operated in conformance with applicable BP corporate policies relating to health, safety, environmental and social matters.

BP's five values³ express the company's "shared understanding of what we believe, how we aim to behave and what we aspire to be as an organisation". The five values are:

- Safety
- Respect
- Excellence
- Courage
- One Team.

These values are fulfilled throughout BP's business through the application of various policies and requirements, relevant components of which are described in the subsections below.

6.7.1 BP Code of Conduct

BP corporate policy, specified in the BP Code of Conduct (2012)⁴, sets out the basic rules that BP people must follow and explains how BP values should guide all decisions.

Effective from 1 January 2012, the new BP Code of Conduct sets the standards BP works to. It is aligned with the values (described above), group standards and legal requirements, and clarifies the ethics and compliance expectations for everyone who works at BP. The Code reflects a values-based approach, where rules are not stated explicitly and everyday business decisions will be guided by our values.

The main structure of the Code remains the similar to the previous version, with sections covering health, safety and the environment; our people, our partners and suppliers, governments and communities; and protecting BP's assets. A new section, 'Living our Code', is designed to help people make decisions when faced with dilemmas where there are no clear rules to follow.

The Code of Conduct applies to all BP activities worldwide and focuses on six areas:

- **Operating safely, responsibly and reliably** – including provisions regarding protection of the natural environment, the safety of communities in which BP operates, and the health, safety and security of BP's people

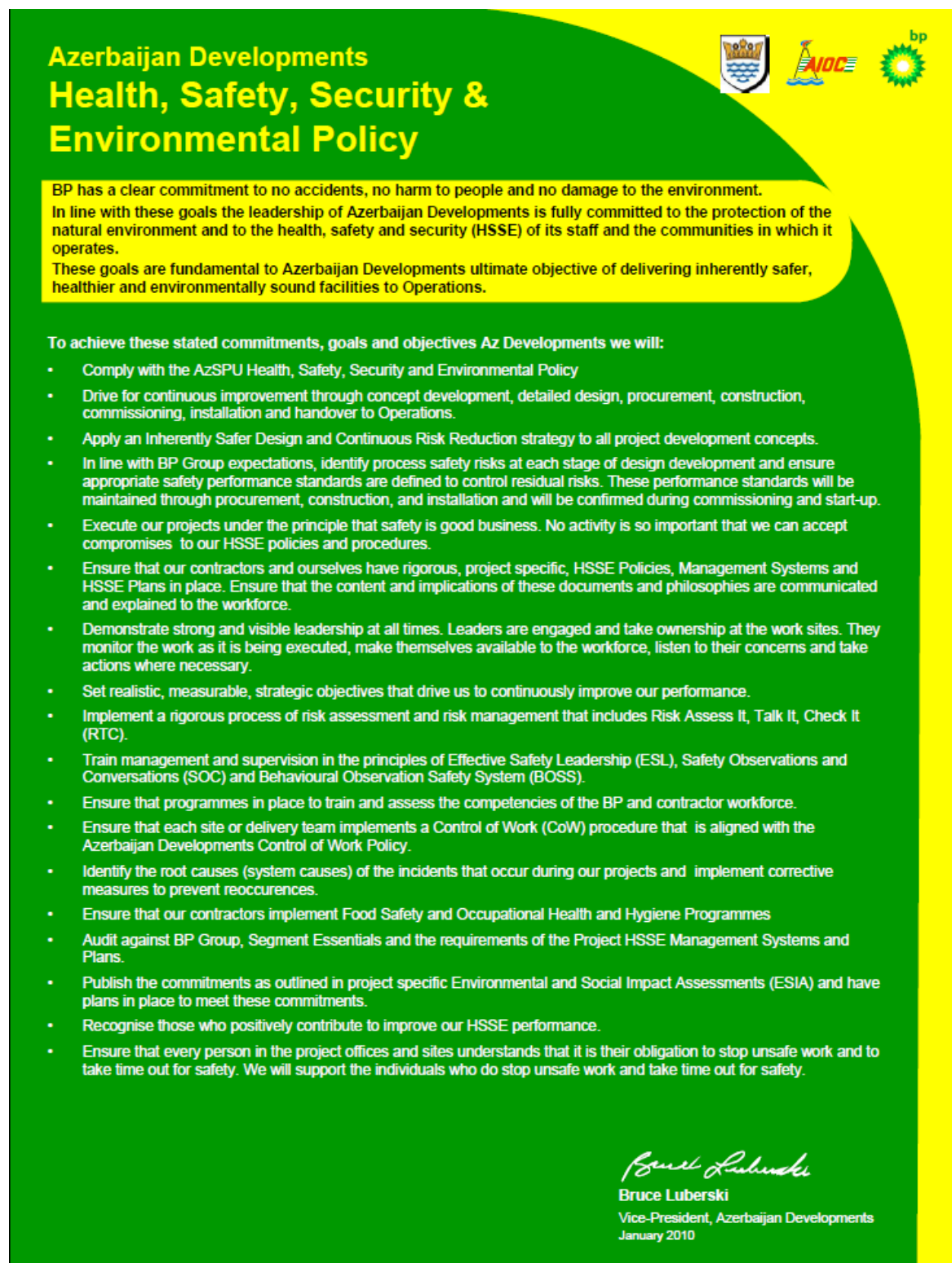
³ Further information on BP's Values is available at <http://www.bp.com/extendedsectiongenericarticle.do?categoryId=9039352&contentId=7072114>

⁴ BP Code of Conduct (2012) available at <http://www.bp.com/sectiongenericarticle.do?categoryId=9038306&contentId=7006600>

- **Our people** – encompassing fair treatment and equal opportunities, providing guidance for dealing with cases of harassment or abuse and for protecting privacy and employee confidentiality
- **Our business partners** – containing detailed guidance on giving and receiving gifts and entertainment, conflicts of interest, competition, trade restrictions, money laundering and working with suppliers
- **The governments and communities we work with** – covering such areas as bribery, dealing with governments, community engagement, external communications and political activity
- **Our assets and financial integrity** – providing for accurate and complete records and reporting, protecting company property, intellectual property, insider trading and digital systems.

6.7.2 HSSE Policy Commitment

BP's commitment to health, safety, security and environmental performance in the Caspian region is outlined in Figure 6-1 overleaf.



The image shows the cover of a policy document titled "Azerbaijan Developments Health, Safety, Security & Environmental Policy". The cover has a green and yellow background. At the top right, there are logos for the Azerbaijan Republic, AIOC, and BP. The title is in large, bold, yellow text. Below the title, there is a yellow box containing a commitment statement. The main body of the document is green and contains a list of 20 bullet points detailing the company's goals and objectives. At the bottom right, there is a signature of Bruce Luberski, Vice-President of Azerbaijan Developments, dated January 2010.

Azerbaijan Developments Health, Safety, Security & Environmental Policy

BP has a clear commitment to no accidents, no harm to people and no damage to the environment. In line with these goals the leadership of Azerbaijan Developments is fully committed to the protection of the natural environment and to the health, safety and security (HSSE) of its staff and the communities in which it operates. These goals are fundamental to Azerbaijan Developments ultimate objective of delivering inherently safer, healthier and environmentally sound facilities to Operations.

To achieve these stated commitments, goals and objectives Az Developments we will:

- Comply with the AzSPU Health, Safety, Security and Environmental Policy
- Drive for continuous improvement through concept development, detailed design, procurement, construction, commissioning, installation and handover to Operations.
- Apply an Inherently Safer Design and Continuous Risk Reduction strategy to all project development concepts.
- In line with BP Group expectations, identify process safety risks at each stage of design development and ensure appropriate safety performance standards are defined to control residual risks. These performance standards will be maintained through procurement, construction, and installation and will be confirmed during commissioning and start-up.
- Execute our projects under the principle that safety is good business. No activity is so important that we can accept compromises to our HSSE policies and procedures.
- Ensure that our contractors and ourselves have rigorous, project specific, HSSE Policies, Management Systems and HSSE Plans in place. Ensure that the content and implications of these documents and philosophies are communicated and explained to the workforce.
- Demonstrate strong and visible leadership at all times. Leaders are engaged and take ownership at the work sites. They monitor the work as it is being executed, make themselves available to the workforce, listen to their concerns and take actions where necessary.
- Set realistic, measurable, strategic objectives that drive us to continuously improve our performance.
- Implement a rigorous process of risk assessment and risk management that includes Risk Assess It, Talk It, Check It (RTC).
- Train management and supervision in the principles of Effective Safety Leadership (ESL), Safety Observations and Conversations (SOC) and Behavioural Observation Safety System (BOSS).
- Ensure that programmes in place to train and assess the competencies of the BP and contractor workforce.
- Ensure that each site or delivery team implements a Control of Work (CoW) procedure that is aligned with the Azerbaijan Developments Control of Work Policy.
- Identify the root causes (system causes) of the incidents that occur during our projects and implement corrective measures to prevent reoccurrences.
- Ensure that our contractors implement Food Safety and Occupational Health and Hygiene Programmes
- Audit against BP Group, Segment Essentials and the requirements of the Project HSSE Management Systems and Plans.
- Publish the commitments as outlined in project specific Environmental and Social Impact Assessments (ESIA) and have plans in place to meet these commitments.
- Recognise those who positively contribute to improve our HSSE performance.
- Ensure that every person in the project offices and sites understands that it is their obligation to stop unsafe work and to take time out for safety. We will support the individuals who do stop unsafe work and take time out for safety.

Bruce Luberski
Bruce Luberski
Vice-President, Azerbaijan Developments
January 2010

Figure 6-1: BP Azerbaijan Developments HSSE Policy

6.7.3 *BP's Approach to Environmental and Social Management*

BP is publicly committed to managing the impacts its operations may have on the environment through the Project life cycle approach. This approach aims to assess the sensitivities of the environments in which it operates, and BP's management of potential impacts on those sensitivities, from the beginning to the end of a project.

By being a responsible operator and investing in communities in ways that seek to promote mutual benefits, BP aims to make the socio-economic impact of its activities positive. Economically, the SCPX Project is expected to benefit local communities through creating jobs, tax revenue and opportunities for local suppliers. BP will respect human rights, engage with communities affected by the Project and seek to preserve cultural heritage.

BP's operating management system (OMS)

BP Group's operating management system (OMS) provides a systematic framework for safe, responsible and reliable activities and continuous performance improvement. It lays out the steps and safeguards BP believes are necessary to maintain responsible operations, including regarding the assessment and management of potential project impacts, whether to land, air, water, flora and wildlife.

Some of the requirements of the OMS are set out in the supporting Group-defined and Group-recommended practices.

All of BP's major operational sites are certified to ISO 14001, the international environmental management system standard, including the existing SCP.

Group-defined practice and Group-recommended practice

BP has a number of Group-defined practices (GDP) that establish requirements and standards within BP and a set of Group-recommended practices (GRP) that provide further guidance and recommendations.

The following GDP and GRP are of particular relevance to the Project and will be implemented:

- Environmental and Social Requirements for New Access Projects, Major Projects, International Protected Area Projects and Acquisition Negotiations GDP ("Environmental and Social GDP"). This practice aims:
 - to help projects identify potential environmental and social impacts, and to use this information in reducing risks
 - be the primary and most efficient mechanism to help projects deliver external environmental and social commitments
 - codify experience and learning, from BP and industry experiences, of managing environmental and social issues. This helps projects to benefit from more efficient and consistent impact identification and management.
- GRP-3.6-0001 Environmental and Social Recommendations for Projects ("Environmental and Social GRP"). This supports the GDP 3.6-0001 described above and provides recommendations on the management of environmental and social impacts from projects
- GRP 7.1-0001 Legal and Regulatory HSSE Compliance. This GRP sets out recommendations regarding how to develop, implement and maintain effective and fit-for-purpose (risk-based) HSSE legal and regulatory compliance management processes.

The Environmental and Social GDP and GRP have been developed having regard to international standards and guidelines that represent good practice in the energy industry, including pipelines. BP has therefore considered them during preparation of the ESIA and when defining mitigation measures and practices.

BP contributed to the establishment of industry standards for the provision of security with respect for human rights, called the Voluntary Principles on Security and Human Rights (the VPs). The VPs were created in 2000 by the UK and US Governments, Amnesty International and Human Rights Watch among other NGOs, and several extractive industry companies. BP has committed to implement the VPs and has published internal and external guidance (the 'BP Voluntary Principles on Security and Human Rights' (2008)⁵ and BP Voluntary Principles on Security and Human Rights (2005)⁶) on conducting risk assessments, working with public security, and working with private security.

In addition, BP's own policies support the principles of the International Labour Organisation (ILO) conventions such as the ILO conventions on basic labour rights (i.e. the right to freedom of association and collective bargaining, and the elimination of forced labour, child labour and discrimination) and the United Nations Universal Declaration of Human Rights.

⁵ BP (2008) Voluntary Principles on Human Security and Human Rights. Implementation Guideline

⁶ BP (2005) Voluntary Principles on Human Security and Human Rights. A Guidance Note available at: http://www.bp.com/liveassets/bp_internet/globalbp/STAGING/global_assets/downloads/BP_Human_Rights_2005.pdf