

11 Environmental and Socio-Economic Management

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11.1 Introduction

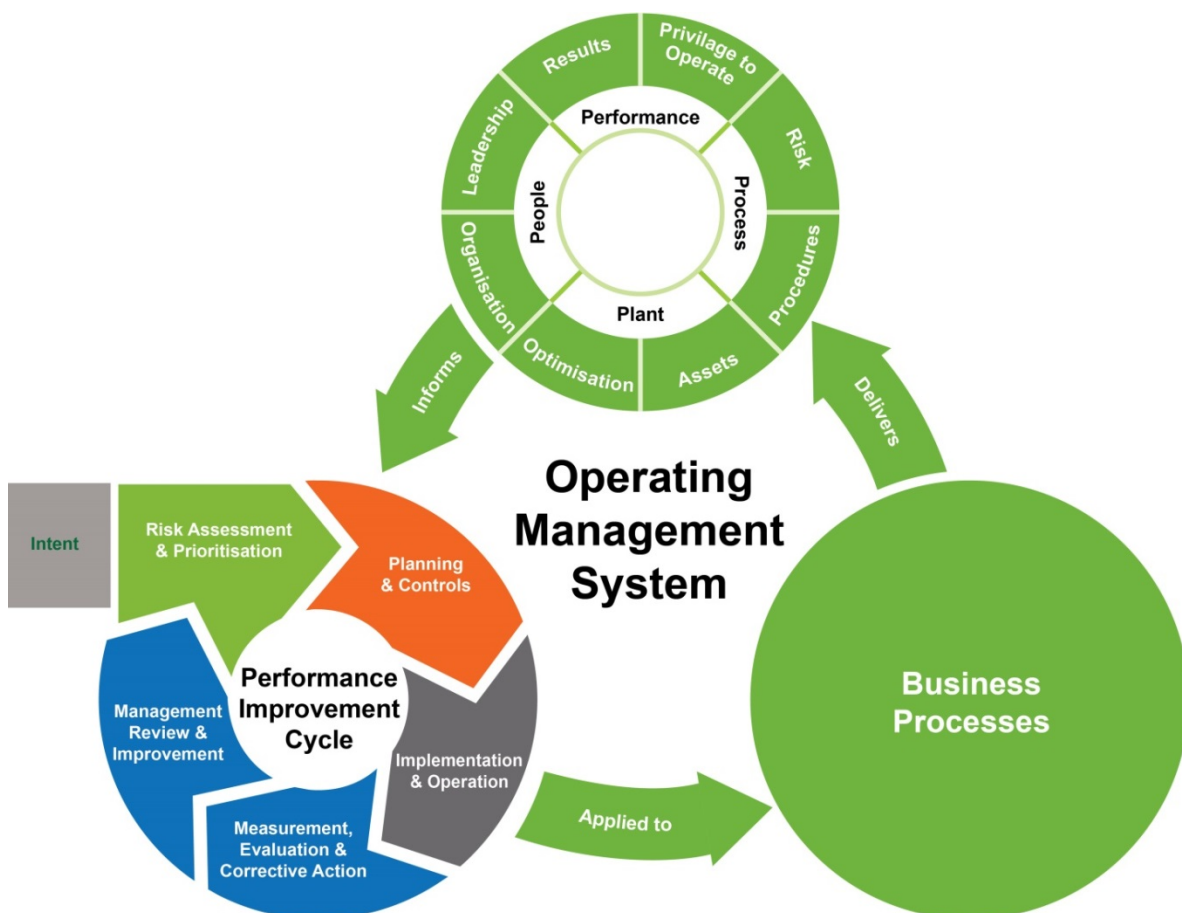
Under the Shallow Water Absheron Peninsula (SWAP) Production Sharing Agreement (PSA), BP as Operator is responsible for the environmental and socio-economic management of the SWAP activities, to ensure that project commitments are implemented, and conforms to applicable environmental and social legal, regulatory and corporate requirements. This Chapter provides an overview of the system that will be used to manage the environmental and socio-economic issues associated with the SWAP 3D Seismic Survey.

11.1.1 Overview of AGT Region Operating Management System

The Azerbaijan Georgia Turkey (AGT) Region manages BP’s operations in Azerbaijan and have an established Operating Management System (OMS). The OMS is a structured set of processes designed to keep operations safe, compliant and reliable. This system forms the structured framework to the Health, Safety, Security and Environment (HSSE) performance of the organisation for which there are six key stages as set out in Figure 11.1:

- Intent;
- Risk Assessment & Prioritisation;
- Planning & Controls;
- Implementation & Operation;
- Measurement, Evaluation & Corrective Action; and
- Management Review & Improvement.

Figure 11.1: AGT Region Operating Management System Framework



11.2 SWAP 3D Seismic Survey Roles and Responsibilities

BP will have overall responsibility for managing the SWAP 3D Seismic Survey and for monitoring and auditing of the technical, safety, environmental and socio-economic performance of the SWAP 3D Seismic Survey Contractor through the implementation of an Environmental and Social Management System (ESMS).

The SWAP 3D Seismic Survey Contractor will be responsible for performing the 3D Seismic Survey; and will be expected to conform fully to the relevant aspects of the BP ESMS for which they are responsible. The SWAP 3D Seismic Survey Contractor will be required to develop and implement an HSSE Management System and ensure conformance against this system. Where required, additional documentation will be developed to interface between the SWAP 3D Seismic Survey Contractor's HSSE System and BP's ESMS; and the SWAP 3D Seismic Survey Contractor will be expected to conform fully to the relevant aspects of these interface documents.

11.3 BP SWAP 3D Seismic Survey Environmental and Social Management System

The ESMS will be developed and implemented by BP, and will form the framework for managing social and environmental issues throughout project execution (which includes the 'pre-survey, 'during survey' and 'post survey' stages). The ESMS will include the following:

- A commitments register that BP has produced listing all the commitments within this ESIA that are to be implemented throughout project execution;
- A legal register of legislation applicable to the project;
- A schedule of monitoring, inspection and audit of environmental performance that includes checking that the SWAP 3D Seismic Survey Contractor is meeting the expectations set out in the ESIA; and
- Implementation of an action tracking system to monitor the findings of inspections and audits that do not conform to the ESIA and the implementation of corrective actions.

The ESMS will be used to deliver the environmental and social commitments (as set out within the commitments register) and to coordinate and review the environmental and social performance of the project throughout project execution. Special consideration will be given to the following:

- Practical training and raising the environmental and social awareness of personnel;
- Supervision and monitoring of environmental and social issues in the field; and
- Continuous improvement of environmental and social performance throughout the project.

11.3.1 SWAP 3D Seismic Survey Environmental and Social Management and Monitoring Plan

To ensure that design controls, mitigation measures, monitoring and reporting requirements described in this ESIA are implemented during the planning and execution of the SWAP 3D Seismic Survey, an overarching ESMMP, supported by a suite of subject matter specific environmental and social management plans, will be prepared SWAP 3D Seismic Survey Contractor.

Following project specific management plans will be developed and finalised during 'pre-survey' of the project and will be regularly reviewed (as appropriate) as the 3D Seismic Survey proceeds:

- Environmental and Cultural Heritage Management Plan;
- Pollution Prevention Plan;
- Communication and Consultation Management Plan;
- Traffic and Transportation Management Plan;
- Spill Prevention, Response, Notification and Close Out Actions Management Plan; and
- Waste Management Plan.

Table 11.1 provides indication of issues covered by each environmental and social management plans.

Table 11.1: Environmental and Social Management Plans

Title of Plan	Issues Covered
Environmental and Cultural Heritage Management Plan	<ul style="list-style-type: none"> • Environmental awareness training • Cultural heritage awareness training • Survey offset distances • On call watching brief processes (ecology and cultural heritage) • Location of known cultural heritage sites • Sound and vibration management • Sound and vibration monitoring
Pollution Prevention Plan	<ul style="list-style-type: none"> • Pollution prevention training • Energy efficiency (vehicle and equipment selection and maintenance) • Emissions and dust management (i.e. vehicle, equipment emissions, dust management) • Wastewater management (e.g. vehicle and equipment washing) • Offshore sewage treatment and disposal • Oil and chemical management (i.e. storage, handling and spill prevention) • Management of hazardous liquid waste • Monitoring and reporting
Communication and Consultation Management Plan	<ul style="list-style-type: none"> • Community liaison training • Approach to communicating with relevant authorities, local community stakeholders (e.g. farmers, property owners, fishermen) and vulnerable groups • Grievance Procedure • Conditions Walkover Survey (land, crops and structures) • Process for Assessing and Compensating affected stakeholders (e.g. landowners, land users, fishermen) • Post-survey Damage Assessment Survey and Procedure • Procedure for communicating results of the sound and vibration monitoring during the 3D Seismic Survey • Community interaction (i.e. prior notification of survey activities, road closures) • Monitoring and reporting
Traffic and Transportation Management Plan	<ul style="list-style-type: none"> • Journey Management Plan • Transport coordination • Driver management training (including off-road driving) • Vehicles maintenance
Spill Prevention, Response, Notification and Close Out Actions Management Plan	<ul style="list-style-type: none"> • Spill prevention • Spill response training • Spill response management • Monitoring and reporting
Waste Management Plan	<ul style="list-style-type: none"> • Waste management training • Waste hierarchy (i.e. reduction at source, reuse, recycling, energy recovery, responsible disposal) and green procurement; • Identification and classification of waste; • Waste register; • Waste handling (i.e. collection, segregation and containers, storage, treatment, transport and documentation, disposal); and • Monitoring and reporting.

In order to confirm the effectiveness of these measures BP will conduct periodic verification checks against:

- Conformance requirements;
- The actions needed to avoid and/or mitigate environmental and socio-economic impacts and to put the commitments within the ESIA into effect;
- The assurance process that will be adopted to monitor and report environmental and socio-economic performance of the SWAP 3D Seismic Survey Contractor, which will include a schedule of monitoring, inspection and audit of environmental performance; and

- Implementation of an action tracking system to monitor the findings of inspections and audits that do not conform to the ESMMP and the implementation of corrective actions.

11.3.2 Monitoring, Inspections, Reporting, Audits and Corrective Actions

The ESMMP will identify key criteria (e.g. waste volumes, spills, etc.) that will be used to measure environmental and socio-economic performance.

The inspection and audit process will be documented with non-conformance reports (NCRs) and corrective action requests (CARs). Both BP and the SWAP 3D Seismic Survey Contractor will develop and maintain action-tracking systems to monitor the effectiveness of actions taken in response to NCRs and CARs.

BP will track the implementation of corrective actions and will update the SWAP 3D Seismic Survey Project Manager daily on non-conformances that require follow-up actions. The SWAP 3D Seismic Survey Contractor will be responsible for the management of their staff.

11.4 Briefings, Planning and Training

Given that the SWAP 3D Seismic Survey activities are of an approximate 9 month duration, establishing key environmental and socio-economic requirements at the outset is important to the provision of effective briefings, planning and training. The main briefing, planning and training elements that will be implemented prior to and during the 3D Seismic Survey are:

- Management briefings to ensure that BP's 3D Seismic Survey Management Team and senior personnel from the 3D Seismic Survey Contractor have a common understanding of the roles, responsibilities and applicable standards set out in the SWAP 3D Seismic Survey ESMMP;
- Environmental and socio-economic induction training for key SWAP 3D Seismic Survey staff to explain the key requirements (e.g. marine mammal observation training described in Section 11.4.1); and
- Daily planning meetings held by the vessel's Master or deputy to plan forthcoming activities to be attended by a senior staff member from each discipline on board.

11.4.1 Marine Mammal Observation Training

Vessel crews will be trained to undertake marine mammal observations. Training will be provided to vessel crews by a specialist Contractor appointed by BP prior to the survey commencing. All training material will be reviewed and agreed with BP.

The training will involve presentations and distribution of guidance documents to vessel crews that will include, but will not be limited to:

- Caspian seal identification;
- Observation methods and techniques;
- Communication protocols between trained vessel crew and vessel Master;
- Actions to take in the event of observing a seal during the 3D Seismic Survey; and
- Recording and reporting requirements.

11.4.2 Environmental and Cultural Heritage Awareness Training

Onshore survey crew will be trained in environmental and cultural heritage awareness. Training will be provided to the onshore seismic crew by a specialist Contractor appointed by BP prior to the survey commencing. All training material will be reviewed and agreed with BP.

The training will involve presentations and distribution of guidance documents to onshore crews that will include, but will not be limited to:

- Measure to minimise dust generation, potential mobilisation of contamination, sound and disturbance;

- Identification of potentially ecological important areas, habitats and species;
- Identification of areas of potential for previously unidentified cultural heritage;
- On call ecological watching brief procedure; and
- On call cultural heritage watching brief procedure.

11.5 Waste Management

Waste management will be undertaken in line with the national regulatory requirements, good international industry practices, BP's AGT Regional Waste Manual and the 3D Seismic Survey Waste Management Plan.

11.5.1 Waste Management Processes and Procedures

A Waste Management Plan will be developed and maintained to cover the duration of the SWAP 3D Seismic Survey; and will address the anticipated waste streams, likely quantities and any special handling requirements.

A schedule of internal audits will be developed to objectively monitor the performance of the waste management systems during the SWAP 3D Seismic Survey and to ensure that all corrective actions and improvements are identified and implemented.

The SWAP 3D Seismic Survey Contractor will receive waste management training covering:

- Identification of waste types and potential associated hazards;
- Waste segregation; and
- Waste transfer documentation (if involved in waste movement).

All new waste disposal routes must be routinely assessed prior to use and be compliant with applicable local laws and regulations. Waste will only be routed to those waste disposal facilities that have been approved for use by the AGT Region.

11.5.2 Waste Segregation and Transfer

Non-hazardous waste generated offshore will be segregated, compacted and stored onboard vessels, and then transferred to the main base and sub bases. Non-hazardous waste generated onshore will be segregated, compacted and stored at the main base and sub bases (along with waste from offshore) until transfer to BP approved waste management facilities for disposal or recycling.

Hazardous waste streams will be segregated and stored separately offshore and onshore to prevent contact between incompatible waste streams. Hazardous waste generated offshore will be stored on board the vessels and transferred onshore to the main base and sub bases (temporary storage), and then onto licensed waste facilities for treatment and disposal. Hazardous waste generated onshore will be stored at the main base and sub bases until transported to licensed waste management facilities for treatment and disposal.

Waste streams will be segregated at source to permit reuse/recycling and to avoid contact between incompatible materials. The segregation requirements will be clearly indicated by the use of containers with clear signage denoting the waste types that are suitable for the containers provided.

All waste transfers will be accompanied by individual Waste Transfer Notes (WTNs), confirming the waste type, quantity, waste generator, consignee, consignor (if different from the generator) and in the case of hazardous wastes, Material Safety Data Sheet (MSDS) and Waste Passports, where required. A final visual inspection of all waste consignments will be made prior to transfer note sign-off and uplift. Copies of the waste transfer documentation together with other relevant information e.g. MSDS, Waste Passports, will be retained by the waste generator. All parties involved in transporting wastes will retain a copy of the WTN.

Hazardous Waste Passports are required for the transportation of hazardous wastes from BP operated facilities to non-BP operated Waste Disposal Contractor facilities within Azerbaijan.

Depending upon the nature of the waste and the approved method of recycling/disposal, wastes may be routed via the Central Waste Accumulation Area (CWAA), waste transfer station or similar facility, or alternatively may be routed directly to their final approved destination.

11.6 Summary of SWAP 3D Seismic Survey ESIA Design Controls, Mitigation Measures, Monitoring and Reporting Requirements

The specific design control, mitigation, monitoring and reporting requirements designed to avoid and/or minimise impacts to the environment and socio-economics, and confirm the effectiveness of these measures as detailed within this ESIA are summarised in Table 11.2. The specific actions required to address the requirements; assigned responsibilities and target close out dates will be developed and included within the SWAP 3D Seismic Survey ESMMP and supporting suite of subject matter specific environmental and social management plans (Section 11.3).

Table 11.2: SWAP 3D Seismic Survey ESIA Design Controls, Mitigation Measures, Monitoring and Reporting Requirements

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
Environmental and Social Management System	Chapter 11, Section 11.2 SWAP 3D Seismic Survey Roles and Responsibilities	BP will have overall responsibility for managing the SWAP 3D Seismic Survey and for monitoring and auditing of the technical, safety, environmental and socio-economic performance of the SWAP 3D Seismic Survey Contractor through the implementation of an Environmental and Social Management System (ESMS).	Pre- S / DS / PS
		The SWAP 3D Seismic Survey Contractor will be responsible for performing the 3D Seismic Survey; and will be expected to conform fully to the relevant aspects of the BP ESMS for which they are responsible. The SWAP 3D Seismic Survey Contractor will be required to develop and implement an HSSE Management System and ensure conformance against this system. Where required, additional documentation will be developed to interface between the SWAP 3D Seismic Survey Contractor's HSSE System and BP's ESMS; and the SWAP 3D Seismic Survey Contractor will be expected to conform fully to the relevant aspects of these interface documents.	Pre-S / DS
	Chapter 11, Section 11.3 BP SWAP 3D Seismic Survey Environmental and Social Management System	<p>The ESMS will be developed and implemented by BP, and will form the framework for managing social and environmental issues throughout project execution (which includes the 'pre-survey', 'during survey' and 'post survey' stages). The ESMS will include the following:</p> <ul style="list-style-type: none"> • A commitments register that BP has produced listing all the commitments within this ESIA that are to be implemented throughout project execution; • A legal register of legislation applicable to the project; • A schedule of monitoring, inspection and audit of environmental performance that includes checking that the SWAP 3D Seismic Survey Contractor is meeting the expectations set out in the ESIA; and • Implementation of an action tracking system to monitor the findings of inspections and audits that do not conform to the ESIA and the implementation of corrective actions. <p>The ESMS will be used to deliver the environmental and social commitments (as set out within the commitments register) and to coordinate and review the environmental and social performance of the project throughout project execution. Special consideration will be given to the following:</p> <ul style="list-style-type: none"> • Practical training and raising the environmental and social awareness of personnel; • Supervision and monitoring of environmental and social issues in the field; and • Continuous improvement of environmental and social performance throughout the project. 	Pre-S / DS / PS
			Pre-S
			Pre-S / DS
			DS
	Chapter 11, Section 11.3.1 BP SWAP 3D Seismic Survey Environmental and Social Management and Monitoring Plan	To ensure that design controls, mitigation measures, monitoring and reporting requirements described in this ESIA are implemented during the planning and execution of the SWAP 3D Seismic Survey, and to confirm the effectiveness of these measures; an overarching ESMMP, supported by a suite of subject matter specific environmental and social management plans, will be prepared. The specific actions required to address these requirements; assigned responsibilities and target close out dates will be developed and included within the ESMMP and supporting suite of subject matter specific environmental and social management plans.	Pre – S / DS / PS
Pre-S			

¹ Pre-Survey (Pre-S); During Survey (DS); Post Survey (PS)

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
	Chapter 11, Section 11.3.1 BP SWAP 3D Seismic Survey Environmental and Social Management and Monitoring Plan	<p>Following project specific management plans will be developed and finalised during 'pre-survey' of the project and will be regularly reviewed (as appropriate) as the 3D Seismic Survey proceeds:</p> <ul style="list-style-type: none"> • Environmental and Cultural Heritage Management Plan; • Pollution Prevention Plan; • Communication and Consultation Management Plan; • Traffic and Transportation Management Plan; • Spill Prevention, Response, Notification and Close Out Actions Management Plan; and • Waste Management Plan. 	Pre-S / DS
	Chapter 11, Section 11.3.1 BP SWAP 3D Seismic Survey Environmental and Social Management and Monitoring Plan	<p>In order to confirm the effectiveness of these measures BP will conduct periodic verification checks against:</p> <ul style="list-style-type: none"> • Conformance requirements; • The actions needed to avoid and/or mitigate environmental and socio-economic impacts and to put the commitments within the ESIA into effect; • The assurance process that will be adopted to monitor and report environmental and socio-economic performance of the SWAP 3D Seismic Survey Contractor, which will include a schedule of monitoring, inspection and audit of environmental performance; and • Implementation of an action tracking system to monitor the findings of inspections and audits that do not conform to the ESMMP and the implementation of corrective actions. 	DS
	Chapter 11, Section 11.4 Briefings, Planning and Training	<p>The main briefing, planning and training elements that will be implemented prior to and during the 3D Seismic Survey are:</p> <ul style="list-style-type: none"> • Management briefings to ensure that BP's 3D Seismic Survey Management Team and senior personnel from the 3D Seismic Survey Contractor have a common understanding of the roles, responsibilities and applicable standards set out in the SWAP 3D Seismic Survey ESMMP; • Environmental and socio-economic induction training for key SWAP 3D Seismic Survey staff to explain the key requirements (e.g. marine mammal observation training described in Section 11.4.1); and • Daily planning meetings held by the vessel's Master or deputy to plan forthcoming activities to be attended by a senior staff member from each discipline on board. 	Pre-S / DS
	Chapter 11, Section 11.3.2 Monitoring, Inspections, Reporting, Audits and Corrective Actions	<p>The ESMMP will identify key criteria (e.g. waste volumes, spills, etc.) that will be used to measure environmental and socio-economic performance.</p> <p>The inspection and audit process will be documented with non-conformance reports (NCRs) and corrective action requests (CARs). Both BP and the SWAP 3D Seismic Survey Contractor will develop and maintain action-tracking systems to monitor the effectiveness of actions taken in response to NCRs and CARs.</p>	Pre-S / DS
			DS

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
		BP will track the implementation of corrective actions and will update the SWAP 3D Seismic Survey Project Manager daily on non-conformances that require follow-up actions. The SWAP 3D Seismic Survey Contractor will be responsible for the management of their staff.	DS
Environmental and Cultural Heritage Management	Chapter 4, Section 4.8.3 Soft Start Procedure	Provided no marine mammals are sighted within the mitigation zone ² over a period of at least 30 minutes before seismic source activation, a 'soft start' procedure of the airguns will commence. If marine mammals are detected within this zone, the soft-start of the seismic sources should be delayed until their passage, or the transit of the vessel, results in the marine mammals being at a distance greater than the mitigation zone distance away from the source. In both cases, there will be a 20 minute delay from the time of the last sighting to the commencement of the soft-start, in order to determine whether the animals have left the area. If marine mammals are detected within the mitigation zone whilst the airguns are firing, either during the soft start procedure or whilst at full power, there is no requirement to stop firing the airguns.	DS
	Chapter 8, Section 8.3. Impacts to the Marine Environment (Water Column) Due to Seismic Operations	<p>Soft-start and Marine Mammal Observation (MMO) protocols</p> <ul style="list-style-type: none"> • Vessel crew will be trained in MMOs; • In water depths greater than 2m the soft-start and marine mammal observation protocol will be followed; • To reduce the potential risk of direct physical harm (especially hearing damage) to seals, the Project will establish a Mitigation Buffer Zone of 500m around sound sources for visual observations of seals; • Prior to the seismic source being activated using a soft-start procedure, marine mammal monitoring will be conducted for 30 minutes to observe (dedicated) whether there are any seals within the Mitigation Buffer Zone. If seals are sighted, the soft-start procedure will be delayed for at least 20 minutes to ensure no seals are within the Mitigation Buffer Zone; • Seismic source soft-start (or ramp up) procedures will be implemented for the survey and conducted each time activation of the source array recommences after a period of inactivity (greater than 20 minutes); • Trained vessel crew will conduct ongoing visual observations of Caspian seal in the vicinity of the survey vessel. All observations will be logged including location of sighting and number of individuals seen. Daily and final summary reports will be prepared; • Survey vessels will not intentionally approach seals for the purposes of casual (recreational) marine mammal viewing which may result in disturbance; and • In water depths less than 2m the soft-start procedure is not required. There will however, be marine mammal observation at the start of any seismic activation or where there has been a period of seismic inactivity greater than 20 minutes. If a seal is observed within the 500m Mitigation Buffer Zone activation will be delayed until there has 	DS

² The area where trained vessel crew keeps watch for marine mammals (and delays the start of activity should any marine mammals be detected). This area is usually defined as 500m from the centre of the airgun array but is dependent on, and informed by, project specific underwater sound modelling.

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
		been a period of 20 minutes without seal observations.	
	Chapter 8, Section 8.3. Impacts to the Marine Environment (Water Column) Due to Seismic Operations	<p>The following monitoring and reporting related to impacts to seals from underwater sound from the sound source will be undertaken:</p> <ul style="list-style-type: none"> In addition to the monitoring and recording Caspian seals as part of the soft start procedure, the trained vessel crew will endeavour to record Caspian seal sightings at other times as far as practically possible; Daily logs of Caspian Seal sightings will be completed by the trained vessel crew using the relevant JNCC marine mammal forms³; A final report summarising the Caspian seal observations over the duration of the survey and including all the daily log forms will be completed by the trained vessel crew and submitted to BP within eight weeks of completion of the survey. 	DS
	Chapter 8, Section 8.7 Impacts to the Terrestrial Environment (Ecology) Due to Offshore Survey Activities	<ul style="list-style-type: none"> Each survey lines will be inspected prior to commencing the survey. Where the survey team are unsure of the potential for protected species, and in the event these areas cannot be avoided, an on call ecological watching brief will be implemented; An on call ecological watching brief will be established using suitably qualified national ecologists to confirm and record the presence of any protected species. Where protected species are identified the watching brief ecologist will confirm the controls required to minimise or avoid impacts; 	DS
	Chapter 9, Section 9.3.3 Offshore Impacts Associated with Operation of Offshore Energy Source	<p>In water depths greater than 2m the following measures will be undertaken:</p> <ul style="list-style-type: none"> Seismic source soft-start (or ramp up) procedures will be implemented for the sound sources used in water depths greater than 2m conducted each time activation of the source array recommences after a period of inactivity; Prior to the seismic source being activated using a soft-start procedure, marine mammal monitoring will be conducted for 30 minutes to observe (dedicated) whether there are any seals within a 500 m Mitigation Buffer Zone around the sound source. If seals are sighted, the soft-start procedure will be delayed for at least 20 minutes to ensure no seals are within the Mitigation Buffer Zone; and Ensure limited/restricted use of airguns during line change (if line change takes longer than 20 minutes). 	DS
	Chapter 8, Section 8.2 Scoping	Onshore survey personnel will be provided with environmental awareness training that includes measures designed to minimise dust.	PS
	Chapter 8, Section 8.2 Scoping	Onshore survey personnel will be provided with environmental awareness training that includes measures designed to minimise potential mobilisation of contamination.	Pre-S
	Chapter 8, Section 8.4 Impacts to the Terrestrial Environment (Birds and Protected Areas) Due to Offshore Survey Activities	Offshore survey personnel will be provided with environmental awareness training that includes measures designed to minimise sound and disturbance generated by offshore survey activities.	Pre-S
	Chapter 8, Section 8.5 Impacts to the Terrestrial Environment (In Air Sound) Due to Onshore Survey Activities	Onshore survey personnel will be provided with environmental awareness training that includes measures designed to minimise sound (e.g. minimise idling and revving of engines);	Pre-S

³ Joint Nature Conservation Committee (JNCC), 2010. JNCC guidelines for minimising the risk of injury and disturbance to marine mammals from seismic surveys, Aberdeen.

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
	Chapter 8, Section 8.7 Impacts to the Terrestrial Environment (Ecology) Due to Offshore Survey Activities	Onshore survey personnel will be provided with environmental awareness training that communicating how to identify important areas, habitats and species present or potentially present within the survey area and what actions to take if these are encountered;	Pre-S
	Chapter 11, Section 11.4.1 Marine Mammal Observation Training	<p>Vessel crews will be trained to undertake marine mammal observations. Training will be provided to vessel crews by a specialist Contractor appointed by BP prior to the survey commencing. All training material will be reviewed and agreed with BP.</p> <p>The training will involve presentations and distribution of guidance documents to vessel crews that will include, but will not be limited to:</p> <ul style="list-style-type: none"> • Caspian seal identification; • Observation methods and techniques; • Communication protocols between trained vessel crew and vessel Master; • Actions to take in the event of observing a seal during the 3D Seismic Survey; and • Recording and reporting requirements. 	Pre-S
	Chapter 11, Section 11.4.2 Environmental and Cultural Heritage Awareness Training	<p>Onshore survey crew will be trained in environmental and cultural heritage awareness. Training will be provided to the onshore seismic crew by a specialist Contractor appointed by BP prior to the survey commencing. All training material will be reviewed and agreed with BP.</p> <p>The training will involve presentations and distribution of guidance documents to onshore crews that will include, but will not be limited to:</p> <ul style="list-style-type: none"> • Measure to minimise dust generation, potential mobilisation of contamination, sound and disturbance; • Identification of potentially ecological important areas, habitats and species; • Identification of areas of potential for previously unidentified cultural heritage; • On call ecological watching brief procedure; and • On call cultural heritage watching brief procedure. 	Pre-S
	Chapter 8, Section 8.5 Impacts to the Terrestrial Environment (In Air Sound) Due to Onshore Survey Activities	<p>The following monitoring and reporting related to sound from the onshore survey activities will be undertaken:</p> <ul style="list-style-type: none"> • A sound monitoring programme will be established prior to and during the onshore seismic survey as part of the Environmental and Cultural Heritage Management Plan with the aim of confirming sound levels prior to and during the survey. Representative sound monitoring shall be carried out periodically during the survey activities e.g. at the start of seismic survey activities near to residential areas in each Priority Area to confirm sound levels; and • Results from the sound monitoring surveys will be provided to relevant key stakeholders as required through the community engagement process specified within the Communication and Consultation Management Plan. 	Pre-S / DS
	Chapter 8, Section 8.5 Impacts to the Terrestrial Environment (In Air Sound) Due to Onshore Survey Activities	<p>The following monitoring and reporting related to sound from the onshore survey activities will be undertaken:</p> <ul style="list-style-type: none"> • A sound monitoring programme will be established prior to and during the onshore seismic survey as part of the Environmental and Cultural Heritage Management Plan with the aim of confirming sound levels prior to and during the survey. Representative sound monitoring shall be carried out periodically during the survey activities e.g. at the start of seismic survey activities near to residential areas in each Priority Area to confirm sound levels; and 	DS / PS

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
		<ul style="list-style-type: none"> Results from the sound monitoring surveys will be provided to relevant key stakeholders as required through the community engagement process specified within the Communication and Consultation Management Plan. 	
	Chapter 8, Section 8.6 Impacts to the Terrestrial Environment (Groundborne Vibration) Due to Offshore Survey Activities	<p>The following monitoring and reporting related to groundborne vibration from the onshore survey activities will be undertaken:</p> <ul style="list-style-type: none"> A vibration monitoring programme will be established during the onshore seismic survey as part of the Environmental and Cultural Heritage Management Plan with the aim of confirming vibration levels during the 3D Seismic Survey; and Results from the vibration monitoring surveys will be provided to relevant key stakeholders as required through the community engagement process specified within the Communication and Consultation Management Plan. 	Pre-S
	Chapter 8, Section 8.6 Impacts to the Terrestrial Environment (Groundborne Vibration) Due to Offshore Survey Activities Chapter 8, Section 8.8 Impacts to the Cultural Heritage Due to Offshore Survey Activities	<p>The following monitoring and reporting related to groundborne vibration from the onshore survey activities will be undertaken:</p> <ul style="list-style-type: none"> A vibration monitoring programme will be established during the onshore seismic survey as part of the Environmental and Cultural Heritage Management Plan with the aim of confirming vibration levels during the 3D Seismic Survey; and Results from the vibration monitoring surveys will be provided to relevant key stakeholders as required through the community engagement process specified within the Communication and Consultation Management Plan. Each survey lines will be inspected prior to commencing the survey. In areas identified by the survey team as having the potential for archaeological or cultural heritage remains, and in the event these areas cannot be avoided, the on call archaeological watching brief will be implemented; An on call archaeological watching brief will be established using representatives from the Institute of Archaeology and Ethnography (IoAE) to identify and record the presence of any cultural heritage sites or artefacts. Where sites or artefacts are identified the watching brief archaeologist will advise on the controls required to minimise or avoid impacts with notification of any finds provided to the Ministry of Culture and Tourism (MoCT). 	DS / PS
	Chapter 8, Section 8.8 Impacts to the Cultural Heritage Due to Offshore Survey Activities	<ul style="list-style-type: none"> Onshore survey personnel will be provided with cultural heritage awareness training which will include communicating the location of known cultural heritage sites and how to identify areas where there is potential for previously unidentified cultural heritage; 	Pre-S
	Chapter 8, Section 8.8 Impacts to the Cultural Heritage Due to Offshore Survey Activities	<p>The following monitoring and reporting related to onshore cultural heritage will be undertaken: A summary of the on-call watching brief findings to be issued to the MoCT and IoAE at completion of seismic survey activities.</p>	PS
	Chapter 9, Section 9.3.2 Offshore Impacts Associated with Physical Presence of Seismic Vessels, Support Vessels and Equipment	<ul style="list-style-type: none"> All vessels will operate in compliance with national and international maritime regulations for avoiding collisions at sea, including the use of signals and lights. Safety exclusion zone will be maintained around seismic vessels to minimise the risk of collision. A safety exclusion zone will be maintained surrounding the offshore seismic survey vessels and equipment to avoid any accidental events involving nearshore users. Support vessels will be present throughout the 3D Seismic Survey. These will be responsible for keeping the seismic vessel and equipment safe from hazards such as other vessels and manmade obstructions along the survey lines. Support vessels will provide additional safety cover to the seismic vessels and can assist in the event of an emergency, whether health and safety or environmental. 	DS

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
	Chapter 8, Section 8.5 Impacts to the Terrestrial Environment (In Air Sound) Due to Onshore Survey Activities Chapter 8, Section 8.8 Impacts to the Cultural Heritage Due to Offshore Survey Activities Chapter 9, Section 9.2 Scoping	<ul style="list-style-type: none"> Safety distances between the seismic sources and existing infrastructure will be defined by the seismic contractor prior to the survey (during the mobilisation phase) in line with the current IAGC Minimum Offset Guidelines for Land Seismic Surveys⁴; Seismic lines will be offset to maintain safety distances from sensitive receptors calculated using relevant guidance and project specific parameters; 	Pre- S / DS
	Chapter 8, Section 8.6 Impacts to the Terrestrial Environment (Groundborne Vibration) Due to Offshore Survey Activities	<ul style="list-style-type: none"> Restrict use of the seismic source to the period required to complete the survey at each source location. 	DS
	Chapter 8, Section 8.7 Impacts to the Terrestrial Environment (Ecology) Due to Offshore Survey Activities	<ul style="list-style-type: none"> There will be no planned vegetation clearance; Survey lines will be marked prior to commencing the survey using biodegradable markings (such as paint, chalk or biodegradable sand bags); 	DS
	Chapter 8, Section 8.8 Impacts to the Cultural Heritage Due to Offshore Survey Activities	<ul style="list-style-type: none"> The seismic contractor will be required to plan the survey to avoid all survey activities over and immediately adjacent to known cultural heritage sites. 	Pre – S / DS
	Chapter 8, Section 8.2 Scoping	<ul style="list-style-type: none"> The survey and support vessels operating in water depths greater than 5m will carry appropriate navigation lights for operating during night-time and periods of poor visibility. The level of lighting will be in compliance with safety regulations at sea to ensure operational safety needs. 	DS
	Chapter 8, Section 8.2 Scoping	When survey and support vessel operations occur in the hours of darkness, exterior vessel lighting will be limited to that necessary for ensuring safe operations.	DS
	Chapter 8, Section 8.3 Impacts to the Marine Environment (Water Column) Due to Seismic Operations Chapter 8, Section 8.4 Impacts to the Terrestrial Environment (Birds and Protected Areas) Due to Offshore Survey Activities	<ul style="list-style-type: none"> The offshore survey will be undertaken using suitably experienced and qualified vessel operators; 	DS
	Chapter 8, Section 8.4 Impacts to the Terrestrial Environment (Birds and Protected Areas) Due to Offshore Survey Activities	<ul style="list-style-type: none"> Risks will be re-assessed and a contingency plan developed in the event that the seismic survey is delayed. 	BS
	Chapter 8, Section 8.3. Impacts to the Marine Environment (Water Column) Due to Seismic Operations	<p>The survey will be undertaken in accordance with the agreed project schedule (refer to Chapter 4 Figure 4.1); the key elements of which are described below;</p> <ul style="list-style-type: none"> The survey within Priority Area 2 will commence in the north and move south in order to reduce potential overlap with seal presence. Within Priority Area 4 the survey will commence in the east and move west to avoid peak sensitivity of migrating 	DS

⁴ International Association of Geophysical Contractors, 2007, Minimum Offset Guidelines for Land Seismic Surveys

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
		seals.	
	Chapter 8, Section 8.4 Impacts to the Terrestrial Environment (Birds and Protected Areas) Due to Offshore Survey Activities	<ul style="list-style-type: none"> It is not planned to undertake any survey activities within the boundary of the Absheron National Park; The survey will be undertaken in accordance with the agreed project schedule (refer to Chapter 4 Figure 4.1); where feasible it has been designed to take into account of the presence and seasonal sensitivity of protected species and protected areas. The survey within Priority Area 2 will commence in the north of the Priority Area and move south, within Priority Area 4 the survey will commence in the east and move west and within Priority Area 1 survey activities within the vicinity of Tava and Boyuk Zira islands will be completed within March In the event that it is not possible to avoid the nesting season (April to July), a local ornithologists will accompany the survey crew. Offshore, should any nesting birds be observed then the survey vessel will approach slowly whilst the ornithologist observes the behaviour of the breeding birds. The ornithologist will advise the survey vessel crew of the level of disturbance which is allowable which may be dependent upon weather and the state of nesting. Onshore, an ornithologist will scout the area prior to the laying of nodes and should any nesting birds be observed the ornithologists will advise the survey crew of the level of disturbance which is allowable. In the event of a delay of more than 7 days, the schedule will be reconfirmed, taking into account safety, technical, operational and ecological seasonal considerations and additional mitigation adopted as required before proceeding. This may include the use of additional buffer zones or adaptation of survey methods; All offshore survey activities within water depths of 5m or less will take place during daylight hours only; The offshore survey will be undertaken using suitably experienced and qualified vessel operators; and Offshore survey personnel will be provided with environmental awareness training that includes measures designed to minimise sound and disturbance generated by offshore survey activities. 	DS
	Chapter 8, Section 8.4 Impacts to the Terrestrial Environment (Birds and Protected Areas) Due to Offshore Survey Activities	<ul style="list-style-type: none"> In Priority Area 1 the survey is planned to be completed within the vicinity of Tava and Boyuk Zira islands within March, prior to the nesting season. However, in the event that it is not possible to avoid the nesting season (April to July), a local ornithologists will accompany the survey crew 	DS
	Chapter 8, Section 8.4 Impacts to the Terrestrial Environment (Birds and Protected Areas) Due to Offshore Survey Activities	<ul style="list-style-type: none"> Offshore, should any nesting birds be observed then the survey vessel will approach slowly whilst the ornithologist observes the behaviour of the breeding birds. The ornithologist will advise the survey vessel crew of the level of disturbance which is allowable which may be dependent upon weather and the state of nesting. 	DS
	Chapter 8, Section 8.4 Impacts to the Terrestrial Environment (Birds and Protected Areas) Due to Offshore Survey Activities	<ul style="list-style-type: none"> Onshore, an ornithologist will scout the area prior to the laying of nodes and should any nesting birds be observed the ornithologists will advise the survey crew of the level of disturbance which is allowable. 	DS
	Chapter 4, Section 4.8.1.2 Onshore	<p>Specific measures to prevent and minimise structural impacts to the local infrastructure and hence interruption to services or damage to public or private buildings or assets will include:</p> <ul style="list-style-type: none"> Pre-survey planning activities will include contacting the relevant authorities to obtain the available information on the locations of existing above and below infrastructure to minimise the risk of physical impact to critical above and below infrastructure (e.g. mains supply pipework); Avoiding sites of high sensitivity (cultural heritage sites, sewage and water supply pipe work etc.). Seismic lines will be offset to maintain safety distances from sensitive receptors calculated using relevant guidance and project specific parameters; 	Pre - S

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
	Chapter 4, Section 4.8.1.2 Onshore Chapter 9, Section 9.2 Scoping	<p>Specific measures to prevent and minimise structural impacts to the local infrastructure and hence interruption to services or damage to public or private buildings or assets will include:</p> <ul style="list-style-type: none"> • Pre-survey planning activities will include contacting the relevant authorities to obtain the available information on the locations of existing above and below infrastructure to minimise the risk of physical impact to critical above and below infrastructure (e.g. mains supply pipework); • Avoiding sites of high sensitivity (cultural heritage sites, sewage and water supply pipe work etc.). Seismic lines will be offset to maintain safety distances from sensitive receptors calculated using relevant guidance and project specific parameters; • Pre-acquisition activities will include reconnaissance surveys, scouting and permitting activities. Preliminary survey operations will include a static control survey and associated integrity confirmation sites, setup of a communication network, mapping the extents of the obstructions and sensitive receptors, identifying and marking access routes, as well as permitting and public relations with local communities, landholders and Government Officials. 	Pre – S / DS
			Pre-S
	Chapter 4, Section 4.8.1.2 Onshore	<p>Throughout operations the following controls will be in place, which contribute to minimising potential for disturbance to the local community and potential effects on community health and safety:</p> <ul style="list-style-type: none"> • Monitoring of safety performance will be undertaken by crew management and operational supervisors in line with corporate procedures and industry good practices; • The worker accommodation and welfare facilities at Hovsan Port will be established and maintained according to appropriate standards, with good housekeeping practices being enforced; 	DS
	Chapter 4, Section 4.8.1.1 Offshore	<p>Specific control measures that will be implemented to minimise interference with other sea users will include:</p> <ul style="list-style-type: none"> • All vessels will operate in compliance with national and international maritime regulations for avoiding collisions at sea, use of signals and lights; • Advanced positioning equipment will be used to maintain communications with other vessels and provide accurate information on the position of the source vessel and associated equipment; • Safety exclusion zone will be maintained around source vessels to minimise the risk of collision; • The seabed hazard and bathymetry surveys conducted prior to the seismic data acquisition will improve understanding of the seabed topography and infrastructure and provide accurate water depths which will ensure operational and navigational safety, and help prevent any accidental events; • Support vessels will be utilised throughout the seismic survey programme. These will be responsible for helping to keep the source vessel and equipment safe from hazards such as other vessels and manmade obstructions along the survey lines. Support vessels will also provide additional safety cover to the source vessels and can assist in the event of an emergency, whether health and safety or environmental; • Survey will be only undertaken if pre-established operating criteria for weather conditions (e.g. wind, waves and visibility) is met; • Vessels will undergo HSE audits/checks prior and during the survey; and • Ensure limited/restricted use of airguns during line change (if line change takes longer than 20 minutes). 	Pre - S
Chapter 4, Section 4.8.1.1 Offshore Chapter 8, Section 8.2 Scoping	<p>Specific control measures that will be implemented to minimise interference with other sea users will include:</p> <ul style="list-style-type: none"> • All vessels will operate in compliance with national and international maritime regulations for avoiding collisions at 	DS	
		DS	

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
		<p>sea, use of signals and lights;</p> <ul style="list-style-type: none"> Advanced positioning equipment will be used to maintain communications with other vessels and provide accurate information on the position of the source vessel and associated equipment; Safety exclusion zone will be maintained around source vessels to minimise the risk of collision; The seabed hazard and bathymetry surveys conducted prior to the seismic data acquisition will improve understanding of the seabed topography and infrastructure and provide accurate water depths which will ensure operational and navigational safety, and help prevent any accidental events; Support vessels will be utilised throughout the seismic survey programme. These will be responsible for helping to keep the source vessel and equipment safe from hazards such as other vessels and manmade obstructions along the survey lines. Support vessels will also provide additional safety cover to the source vessels and can assist in the event of an emergency, whether health and safety or environmental; Survey will be only undertaken if pre-established operating criteria for weather conditions (e.g. wind, waves and visibility) is met; Vessels will undergo HSE audits/checks prior and during the survey; and Ensure limited/restricted use of airguns during line change (if line change takes longer than 20 minutes). There will be no anchoring or node deployment in areas of the seabed where marine cultural heritage sites are known or suspected to be located. 	Pre-S
			DS
			DS
			Pre-S
			DS
			DS
	Chapter 8, Section 8.2 Scoping	Vessels and energy sources will be operated in line with procedures which include minimal seabed clearance	DS
	Chapter 8, Section 8.2 Scoping	Low volume energy sources will be used in shallow waters; 300 cu in volume for 0 – 2m and 680 cu in for 2 – 5m	DS
Chapter 8, Section 8.2 Scoping	Vessels and equipment will undergo fit out, audits and checks at the main base before the survey commences.	Pre-S	
Chapter 8, Section 8.2 Scoping	To minimise potential for introduction of invasive species to the Caspian Sea imported vessels and equipment will undergo thorough cleaning in line with relevant guidelines ⁵ .	Pre-S	
Chapter 8, Section 8.2 Scoping	Maintenance activities will predominantly be undertaken in warehouses and workshops, minimising potential sound and disturbance.	DS	
Chapter 8, Section 8.2 Scoping Chapter 8, Section 8.5 Impacts to the Terrestrial Environment (In Air Sound) Due to Onshore Survey Activities Chapter 8, Section 8.7 Impacts to the Terrestrial Environment (Ecology) Due to Offshore Survey Activities Chapter 8, Section 8.8 Impacts to the Cultural Heritage Due to Offshore Survey Activities	Prior to the Seismic Survey commencing a programme of pre-planning surveys will be undertaken in accordance with the Communication and Consultation Management Plan. These activities will inform the Seismic Survey design, including further informing the positioning of survey lines and which of the proposed onshore methods are suitable for which areas (i.e. vibroseis or OnSeis).	PS	

⁵ Such as Marine Biofouling And Invasive Species: Guidelines For Prevention And Management, Global Invasive Species Programme & UNEP Regional Seas Programme, 2008

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
	Chapter 9, Section 9.2 Scoping		
	Chapter 8, Section 8.2 Scoping Chapter 9, Section 9.3.2 Offshore Impacts Associated with Physical Presence of Seismic Vessels, Support Vessels and Equipment	Prior to the seismic survey being undertaken offshore reconnaissance and seabed hazard surveys will be undertaken, including marine side scan, magnetometer, and multi-beam bathymetry surveys to confirm the location of seabed hazards to allow the survey team to plan to avoid these.	Pre- S
	Chapter 10, Section 10.4.1.1 Vessel Collision	Furthermore, a hazard survey of the Survey Area will be undertaken by BP to confirm the location of seabed infrastructure and other hazards prior to the seismic survey to inform seismic line design and to minimise potential for any accidental interference. Furthermore, seismic survey vessels will operate at slow speed (5-7 km/h), will have trained observers onboard monitoring animal movement during daylight hours and a soft start procedure will be implemented during start-up of the air guns (in water depths greater than 2m).	Pre-S
	Chapter 8, Section 8.2 Scoping	As part of the pre-planning surveys areas of visible contamination will be identified and mapped so that survey can, as far as possible, be planned to avoid areas of contamination.	Pre-S
	Chapter 8, Section 8.4 Impacts to the Terrestrial Environment (Birds and Protected Areas) Due to Offshore Survey Activities Chapter 9, Section 9.3.1 Onshore Impacts Associated with Physical Presence of Seismic Vehicles and Support Vehicles, Equipment and Crew	All offshore survey activities within water depths of 5m or less will take place during daylight hours only.	DS
	Chapter 8, Section 8.5 Impacts to the Terrestrial Environment (In Air Sound) Due to Onshore Survey Activities Chapter 9, Section 9.3.1 Onshore Impacts Associated with Physical Presence of Seismic Vehicles and Support Vehicles, Equipment and Crew	All onshore survey activities will take place during daylight hours only.	DS
	Chapter 4, Section 4.7.1 Emissions to Atmosphere	All shipboard emissions will be in compliance with MARPOL 73/78 Regulations for the prevention of air pollution from ships (Annex VI), aiming to reduce global emissions of SO _x , NO _x and particulate matter. Low sulphur fuel will be used where possible.	DS
Pollution Prevention	Chapter 4, Section 4.7.2 Discharges to Sea	With the exception of deck drainage runoff there will be no planned discharges to sea associated with the offshore survey vessels.	DS
	Chapter 8, Section 8.2 Scoping	In accordance with the PSA, deck drainage and wash water will be discharged from vessels as long as no visible sheen is observable. Oily and clean drainage or wash water will be segregated; clean water will be discharged to sea and oily water transported to an appropriate onshore disposal facility.	DS

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
	Chapter 8, Section 8.2 Scoping	Vessels will be well maintained and, where available, will use good quality, and low sulphur fuel (typically <0.05% weight).	DS
	Chapter 8, Section 8.2 Scoping	The volume of fuel used by the vessels over the duration of the survey will be recorded and reported to the Ministry of Ecology and Natural Resources at the end of the survey.	DS
	Chapter 8, Section 8.2 Scoping	<p>Black and grey water generated at the main base/sub-bases will either:</p> <ul style="list-style-type: none"> • Be sent to a municipal sewage treatment plant for treatment and disposal via mains sewer pipes, or • If the base/sub base has an operational sewage treatment plant that discharges treated effluent to the environment, the base/sub base operator will be responsible for agreeing the discharge standard with the MENR and maintaining the discharge permit conditions stipulated by the MENR. 	DS
	Chapter 8, Section 8.2 Scoping	<ul style="list-style-type: none"> • Drainage water from areas in the base/sub base(s) in which hazardous materials are stored and routinely used will be contained and will be collected by road tanker, handled as liquid waste and removed from site. Where the base operator has an agreement with the MENR for discharge of drainage from areas where hazardous materials are storage or used, they will be responsible for maintaining the discharge permit conditions stipulated by the MENR. 	DS
	Chapter 9, Section 9.3.1 Onshore Impacts Associated with Physical Presence of Seismic Vehicles and Support Vehicles, Equipment and Crew	<p>As part of pre-survey activities the following will be completed:</p> <ul style="list-style-type: none"> • Land boundaries and restricted areas along the route of the planned survey lines will be confirmed. • Landowners and land users along the route of the planned survey lines will be identified and permission for access obtained. 	Pre-S
Communication and Consultation Management	Chapter 9, Section 9.3.1 Onshore Impacts Associated with Physical Presence of Seismic Vehicles and Support Vehicles, Equipment and Crew	<p>During the 3D Seismic Survey, the following will be undertaken:</p> <ul style="list-style-type: none"> • A Conditions Walkover Survey will be conducted along the seismic survey line (ahead of the 3D Seismic Survey team) to identify the characteristics and condition of the land, structures and crops, which may be impacted by the 3D Seismic Survey Activities. • The seismic contractor will be required to report and record any damage to infrastructure or crops caused by the survey. • A Communication and Consultation Management Plan will be implemented and maintained as a mechanism of communicating with the communities and relevant authorities. As part of the plan, Community Liaison Officers (CLOs) will arrange meetings with community leaders, farmers and property owners and will provide information to the local people about the seismic operations and record all grievances. • A grievance procedure to enable public and stakeholder concerns to be addressed in effective and timely manner will be established and implemented. • A compensation procedure to assess and manage claims, made by the public and stakeholders, for damage specifically caused as a direct result of 3D Seismic Survey activities, will be established and implemented. 	DS

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
	Chapter 9, Section 9.3.1 Onshore Impacts Associated with Physical Presence of Seismic Vehicles and Support Vehicles, Equipment and Crew Chapter 9, Section 9.3.1 Onshore Impacts Associated with Physical Presence of Seismic Vehicles and Support Vehicles, Equipment and Crew	<p>During the 3D Seismic Survey, the following will be undertaken:</p> <ul style="list-style-type: none"> • A Conditions Walkover Survey will be conducted along the seismic survey line (ahead of the 3D Seismic Survey team) to identify the characteristics and condition of the land, structures and crops, which may be impacted by the 3D Seismic Survey Activities. • The seismic contractor will be required to report and record any damage to infrastructure or crops caused by the survey. • A Communication and Consultation Management Plan will be implemented and maintained as a mechanism of communicating with the communities and relevant authorities. As part of the plan, Community Liaison Officers (CLOs) will arrange meetings with community leaders, farmers and property owners and will provide information to the local people about the seismic operations and record all grievances. • A grievance procedure to enable public and stakeholder concerns to be addressed in effective and timely manner will be established and implemented. • A compensation procedure to assess and manage claims, made by the public and stakeholders, for damage specifically caused as a direct result of 3D Seismic Survey activities, will be established and implemented. • Following the completion of the survey, all legitimate claims for damage specifically caused as a direct result of the 3D Seismic Survey activities will be recorded and eligible claims will be processed with compensation provided accordingly. 	Pre-S / DS / PS
	Chapter 9, Section 9.3.1 Onshore Impacts Associated with Physical Presence of Seismic Vehicles and Support Vehicles, Equipment and Crew	<p>The following monitoring and reporting related to onshore impacts associated with the operation of the seismic vehicles, support vehicles and equipment; and the presence of the crew will be undertaken:</p> <ul style="list-style-type: none"> • Information gathered during pre-survey activities will be stored on file and treated as confidential material, as it will contain personal details associated with land ownership and land use. • The types of communications delivered by CLOs and the queries received from stakeholders during the 3D Seismic Survey will be recorded and monitored, to ensure that adequate information is being provided to local residents and business owners, including the schedule and nature of activities involved in the 3D Seismic Survey. • The types of damage caused (if any) will be carefully monitored (i.e. logged, recorded and managed) to ensure that the level of disruption to land owners and land users is minimised. 	PS
	Chapter 9, Section 9.3.1 Onshore Impacts Associated with Physical Presence of Seismic Vehicles and Support Vehicles, Equipment and Crew	<p>The following monitoring and reporting related to onshore impacts associated with the operation of the seismic vehicles, support vehicles and equipment; and the presence of the crew will be undertaken:</p> <ul style="list-style-type: none"> • Information gathered during pre-survey activities will be stored on file and treated as confidential material, as it will contain personal details associated with land ownership and land use. • The types of communications delivered by CLOs and the queries received from stakeholders during the 3D Seismic Survey will be recorded and monitored, to ensure that adequate information is being provided to local residents and business owners, including the schedule and nature of activities involved in the 3D Seismic Survey. • The types of damage caused (if any) will be carefully monitored (i.e. logged, recorded and managed) to ensure that the level of disruption to land owners and land users is minimised. 	Pre-S
	Chapter 4, Section 4.8.1.2 Onshore	Specific measures to prevent and minimise structural impacts to the local infrastructure and hence interruption to services or damage to public or private buildings or assets will include:	DS

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
		<ul style="list-style-type: none"> • Every effort will be made by the survey team to minimise disruption to local communities and avoid damage to existing infrastructure, assets, structures (whether private, public or historic) and crops. The seismic contractor will be required to maintain a record of any damage that occurs; • Establishing and implementing a grievance procedure to enable public and stakeholder concerns to be addressed in effective and timely manner; and • In the event of infrastructure damage being caused by survey activities, appropriate compensation will be paid in line with established BP compensation procedures. 	
	<p>Chapter 4, Section 4.8.1.2 Onshore Chapter 4, Section 4.8.2 Communications</p>	<p>Specific measures to prevent and minimise structural impacts to the local infrastructure and hence interruption to services or damage to public or private buildings or assets will include:</p> <ul style="list-style-type: none"> • Every effort will be made by the survey team to minimise disruption to local communities and avoid damage to existing infrastructure, assets, structures (whether private, public or historic) and crops. The seismic contractor will be required to maintain a record of any damage that occurs; • Establishing and implementing a grievance procedure to enable public and stakeholder concerns to be addressed in effective and timely manner; and • In the event of infrastructure damage being caused by survey activities, appropriate compensation will be paid in line with established BP compensation procedures. <p>The seismic survey programme will be diligently planned and potential interference with land and sea users will be minimised through effective communications with the relevant authorities and stakeholders prior to and during the survey. All appropriate permits and compliance conditions will be sought and obtained well in advance of the operations.</p> <p>A dedicated Government Relations Adviser (GRA) will maintain communications between BP / seismic contractor and relevant governmental bodies, negotiate with different Government sectors and request for assistance from them, if necessary.</p> <ul style="list-style-type: none"> • The establishment and maintenance of good community relations will be crucial to the success of the operations. The public, including the local community, will be informed of the execution and timing of the work whenever necessary and educated in the hazards associated with the working environment to ensure a safe and smooth operation. Community Liaison Officers (CLOs) will arrange meetings with community leaders, farmers and property owners and will provide information to the local people about the seismic operations, request permission for the seismic team to enter the area, relay information between the seismic crew and the public and address any grievances. 	<p>DS / PS</p> <p>Pre-S / DS / PS</p>
	<p>Chapter 8, Section 8.5 Impacts to the Terrestrial Environment (In Air Sound) Due to Onshore Survey Activities Chapter 9, Section 9.2 Scoping</p>	<p>A Communication and Consultation Management Plan will be implemented and maintained as a mechanism of communicating with the communities. As part of the plan CLOs will arrange meetings with community leaders, farmers and property owners and will provide information to the local people about the seismic operations, relay information between the seismic crew and the public and address any grievances</p>	<p>Pre – S / DS / PS</p>
	<p>Chapter 9, Section 9.3.1 Onshore Impacts Associated with Physical Presence of Seismic Vehicles and Support Vehicles, Equipment and Crew</p>	<ul style="list-style-type: none"> • The Communication and Consultation Management Plan will include specific provisions to provide support to different types of vulnerable people expected to be present across the survey area. People may be vulnerable due to their age disability or other reason and may need special assistance during the initial stages of the 3D Seismic 	<p>Pre- S</p>

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
		<p>Survey.</p> <p>Information provided to vulnerable people during the process of obtaining permission from land owners or land users will be clearly communicated to avoid misunderstandings associated with the purpose and range of activities to be conducted during the 3D Seismic Survey.</p>	
	<p>Chapter 9, Section 9.3.1 Onshore Impacts Associated with Physical Presence of Seismic Vehicles and Support Vehicles, Equipment and Crew Chapter 9, Section 9.2 Scoping</p>	<ul style="list-style-type: none"> • The Communication and Consultation Management Plan will include specific provisions to provide support to different types of vulnerable people expected to be present across the survey area. People may be vulnerable due to their age disability or other reason and may need special assistance during the initial stages of the 3D Seismic Survey. • Information provided to vulnerable people during the process of obtaining permission from land owners or land users will be clearly communicated to avoid misunderstandings associated with the purpose and range of activities to be conducted during the 3D Seismic Survey. • Information provided to local people will include an overview of the planned deployment of nodes and the requirement not to interfere with them will be communicated. 	<p>DS</p> <p>Pre – S / DS</p>
	<p>Chapter 9, Section 9.2 Scoping</p>	<p>Communication from the local communities will be continuously monitored throughout the 3D Seismic Survey to identify any issues. Any reports of injury will be immediately reported in accordance with the reporting procedures set out with the Communication and Consultation Management Plan for investigation.</p>	<p>DS / PS</p>
	<p>Chapter 9, Section 9.3.2 Offshore Impacts Associated with Physical Presence of Seismic Vessels, Support Vessels and Equipment</p>	<ul style="list-style-type: none"> • A Communication and Consultation Management Plan will be implemented and maintained as a mechanism of communicating with the communities. As part of the plan, CLOs will arrange meetings with small-scale coastal fishermen and will provide information to the local people about the seismic operations, relay information between the seismic crew and the public and address any grievances. • Notifications regarding the survey programme will be issued to the relevant maritime and port authorities, as well as directly communicated with sea users where necessary, in advance of the 3D Seismic Survey. This will include communications to small-scale coastal fishermen and recreational maritime users. • Advanced positioning equipment will be used to maintain communications with other vessels and provide accurate information on the position of the seismic vessel and associated equipment. This will include communications with coastal small-scale fishermen and recreational maritime users. • As part of the pre-survey activities, maritime businesses (including diving companies) will be consulted and informed of the 3D Seismic Survey Activities and the planned schedule. As part of the consultation, dive locations will be confirmed and this information provided to seismic contractor. • In the event that fixed fishing gear is identified on the seabed during the seabed hazard survey, the seismic survey will be planned, as far as possible, to avoid it. It is not planned to remove fixed fishing gear. However, if removal is required, suitable monitoring and reporting measures will be implemented. <p>Any grievances raised by affected fishermen will be managed through a grievance procedure which sets out the processes through which complaints are logged and recorded; and the approach to managing the complaint in an appropriate and timely manner. Where corrective actions are required; they will be implemented effectively and in a timely manner.</p>	<p>Pre – S / DS / PS</p>
	<p>Chapter 9, Section 9.3.2 Offshore Impacts Associated with Physical Presence of Seismic Vessels, Support</p>	<ul style="list-style-type: none"> • A Communication and Consultation Management Plan will be implemented and maintained as a mechanism of 	<p>Pre - S</p>

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
	Vessels and Equipment Chapter 9, Section 9.2 Scoping	<p>communicating with the communities. As part of the plan, CLOs will arrange meetings with small-scale coastal fishermen and will provide information to the local people about the seismic operations, relay information between the seismic crew and the public and address any grievances.</p> <ul style="list-style-type: none"> • Notifications regarding the survey programme will be issued to the relevant maritime and port authorities, as well as directly communicated with sea users where necessary, in advance of the 3D Seismic Survey. This will include communications to small-scale coastal fishermen and recreational maritime users. • Advanced positioning equipment will be used to maintain communications with other vessels and provide accurate information on the position of the seismic vessel and associated equipment. This will include communications with coastal small-scale fishermen and recreational maritime users. • As part of the pre-survey activities, maritime businesses (including diving companies) will be consulted and informed of the 3D Seismic Survey Activities and the planned schedule. As part of the consultation, dive locations will be confirmed and this information provided to seismic contractor. • In the event that fixed fishing gear is identified on the seabed during the seabed hazard survey, the seismic survey will be planned, as far as possible, to avoid it. It is not planned to remove fixed fishing gear. However, if removal is required, suitable monitoring and reporting measures will be implemented. • Any grievances raised by affected fishermen will be managed through a grievance procedure which sets out the processes through which complaints are logged and recorded; and the approach to managing the complaint in an appropriate and timely manner. Where corrective actions are required; they will be implemented effectively and in a timely manner. • To notify recreational maritime users of the survey activities signs will located in public spaces (including tourist areas and beaches) communicating planned activities and schedule, the potential risks to recreational maritime users associated with the survey activities and advice on avoiding the survey areas. • The scope of the Communication and Consultation Management Plan will include owners of summer houses, tourist resorts and hotels to ensure the schedule and scope of the survey in each area is communicated in addition to potential impacts. • As part of the pre-survey activities, maritime businesses (including diving companies) will be consulted and informed of the 3D Seismic Survey Activities and the planned schedule. As part of the consultation, dive locations will be confirmed and this information provided to seismic contractor. 	<p>DS</p> <hr/> <p>Pre - S</p> <hr/> <p>Pre – S / DS</p> <hr/> <p>DS</p> <hr/> <p>Pre-S / DS</p>
	Chapter 9, Section 9.2 Scoping Chapter 4, Section 4.8.1.1 Offshore Chapter 9, Section 9.2 Scoping	<ul style="list-style-type: none"> • To notify recreational maritime users of the survey activities signs will located in public spaces (including tourist areas and beaches) communicating planned activities and schedule, the potential risks to recreational maritime users associated with the survey activities and advice on avoiding the survey areas. • The scope of the Communication and Consultation Management Plan will include owners of summer houses, tourist resorts and hotels to ensure the schedule and scope of the survey in each area is communicated in addition to potential impacts. • As part of the pre-survey activities, maritime businesses (including diving companies) will be consulted and informed of the 3D Seismic Survey Activities and the planned schedule. As part of the consultation, dive locations will be confirmed and this information provided to seismic contractor. • Notifications regarding the survey programme will be issued to the relevant maritime and port authorities, as well as directly communicated with sea users where necessary, in advance of the survey; 	<p>Pre-S</p> <hr/> <p>Pre-S</p>
	Chapter 9, Section 9.2 Scoping Chapter 9, Section 9.3.2 Offshore Impacts Associated	The dive companies will be contacted immediately prior to the 3D Seismic Survey operating in the vicinity of the dive sites. The diving companies will be asked to restrict diving activities to areas outside of the immediate survey area when 3D Seismic	Pre – S / DS

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
	with Physical Presence of Seismic Vessels, Support Vessels and Equipment	Survey Activities are within the vicinity of the dive locations.	
	Chapter 9, Section 9.2 Scoping Chapter 9, Section 9.3.2 Offshore Impacts Associated with Physical Presence of Seismic Vessels, Support Vessels and Equipment	While the 3D Seismic Survey is being undertaken in the vicinity of the dive sites, vessel crew members will undertake observations for dive boats and divers. If a dive boat is identified, the chase vessel will immediately make contact with the dive boat operator.	DS
	Chapter 9, Section 9.3.2 Offshore Impacts Associated with Physical Presence of Seismic Vessels, Support Vessels and Equipment	Consultation activities will include identifying and notifying dive companies of the survey activities with companies being requested to restrict diving activities to areas outside of the immediate survey area when 3D Seismic Survey Activities are within the vicinity of the dive locations. Chase vessels will be used during the survey in the vicinity of dive locations to ensure dive boats are warned of the survey activities.	Pre – S / DS
	Chapter 9, Section 9.3.2 Offshore Impacts Associated with Physical Presence of Seismic Vessels, Support Vessels and Equipment	Small-scale coastal fishermen will be notified of the 3D Seismic Survey Activities in advance so that they are able to plan modifications from their normal activities to reflect the position of the seismic vessels.	Pre-S / DS
	Chapter 9, Section 9.3.2 Offshore Impacts Associated with Physical Presence of Seismic Vessels, Support Vessels and Equipment	The following monitoring and reporting related to small scale coastal fishing as a result of the physical presence of the seismic vessels, support vessels and equipment will be undertaken: Any existing fixed equipment which is removed or damaged as a result of the 3D Seismic Survey which the seismic vessel crew cannot confirm is not associated with small scale fishing will be monitored (i.e. logged and recorded). The log will include a description of the equipment, the date it was removed or damaged and the location encountered.	DS
	Chapter 8, Section 8.5 Impacts to the Terrestrial Environment (In Air Sound) Due to Onshore Survey Activities Chapter 9, Section 9.2 Scoping Chapter 9, Section 9.3.1 Onshore Impacts Associated with Physical Presence of Seismic Vehicles and Support Vehicles, Equipment and Crew	<ul style="list-style-type: none"> A grievance procedure to enable public and stakeholder concerns to be addressed in effective and timely manner will be established and implemented 	Pre – S / DS / PS
	Chapter 4, Section 4.6.6 Transport Coordination	There will be dedicated transport co-ordinators to control and coordinate both onshore and offshore vehicles and vessels. Their responsibilities will include ensuring mechanical suitability of all vehicles and vessels, driver quality and day to day coordination of transport traffic. The transport coordinators will work closely with the base camp radio operators. Journey management systems will be implemented to efficiently track and plan all movements, while a vehicle tracking system will be employed to aid in this purpose.	DS
Traffic and Transpo	Chapter 8, Section 8.2 Scoping Chapter 9, Section 9.2 Scoping Chapter 10, Section 10.4.2.1 Road Accidents	Vehicle speed limits established for different road surfaces will be adhered to at all times during the survey.	DS
	Chapter 8, Section 8.2 Scoping Chapter 8, Section 8.7 Impacts to the Terrestrial	The survey will be undertaken using the existing road network, but it will also be necessary to travel off road to access receiver and source points. Off road vehicle movements will be minimised as far as practical.	DS

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
	Environment (Ecology) Due to Offshore Survey Activities		
	Chapter 8, Section 8.2 Scoping Chapter 8, Section 8.5 Impacts to the Terrestrial Environment (In Air Sound) Due to Onshore Survey Activities Chapter 8, Section 8.7 Impacts to the Terrestrial Environment (Ecology) Due to Offshore Survey Activities	Vehicles movements will be minimised as far as possible.	DS
	Chapter 4, Section 4.8.1.2 Onshore	<ul style="list-style-type: none"> • Transport equipment will be subject to stringent checks to ensure mechanical and safety road-worthiness. All vehicles will be fitted with appropriate safety equipment; • Risks associated with road transport will be managed through the implementation of a Journey Management Plan, detailing actions for improving driver and vehicle safety, enforcement of speed limits at all times, among others; 	DS
	Chapter 9, Section 9.2 Scoping	<ul style="list-style-type: none"> • Seismic vehicles (Vibroseis trucks and Onseis units) will use the existing road network to travel to the survey locations. In addition, the survey itself will be undertaken along, across and adjacent to existing roads. Vehicles will need to travel off-road, where necessary, to access receiver / source points 	DS
	Chapter 9, Section 9.2 Scoping	<ul style="list-style-type: none"> • Road closures are not planned; however, if road closures are necessary, they will be temporary and limited to the minimum time necessary to complete the operation safely. • There will be no planned closure of the Baku-Salyan highway. • Road closures will be organised in close liaison with relevant authorities and will only take place after permission for the road closure has been granted. • Dedicated transport coordinators will be used to control and monitor all vehicle movements and their responsibilities will include ensuring that all vehicles used are well-maintained; suitable for the terrain and that the drivers have received adequate training. • A Journey Management Plan will be implemented to ensure efficient planning of all vehicle movements in advance. • For the purpose of the 3D Seismic Survey, no night-time driving, or driving during the hours of darkness, will be permitted (unless in the case of an emergency). • Permission will be obtained from land owners before private land and roads are accessed. 	DS
	Chapter 9, Section 9.2 Scoping Chapter 4, Section 4.8.1.1 Offshore	<ul style="list-style-type: none"> • Road closures are not planned; however, if road closures are necessary, they will be temporary and limited to the minimum time necessary to complete the operation safely. • There will be no planned closure of the Baku-Salyan highway. • Road closures will be organised in close liaison with relevant authorities and will only take place after permission for the road closure has been granted. • Dedicated transport coordinators will be used to control and monitor all vehicle movements and their responsibilities will include ensuring that all vehicles used are well-maintained; suitable for the terrain and that the drivers have 	Pre-S / DS

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
		<p>received adequate training.</p> <ul style="list-style-type: none"> • A Journey Management Plan will be implemented to ensure efficient planning of all vehicle movements in advance. • For the purpose of the 3D Seismic Survey, no night-time driving, or driving during the hours of darkness, will be permitted (unless in the case of an emergency). • Permission will be obtained from land owners before private land and roads are accessed. • All vessel movements will be under the control of the seismic contractor Logistics Control Room (LCR) who has the complete authority for directing vessels when they are offshore. Clear lines of communication and operational procedures will be established between all survey and support vessels before the start of surveying 	Pre-S / DS
	Chapter 10, Section 10.4.2.1 Road Accidents	BP and the seismic contractor will provide dedicated transport coordinators to control and coordinate vehicle journeys. Their responsibilities will include ensuring mechanical suitability of all vehicles, drivers' competency and day to day coordination of Project transport requirements.	DS
	Chapter 10, Section 10.4.2.1 Road Accidents	<p>Additional measures to mitigate the risk of road accidents will include:</p> <ul style="list-style-type: none"> • Development and implementation of a Journey Management Plan, detailing actions for improving driver and vehicle safety, enforcement of speed limits at all times, etc.; • Vehicle movements will be minimised as far as possible; • As far as possible the survey will be undertaken using existing roads, with a preference for use of surfaced roads and off road vehicle movements will be minimised as far as practical; • A review of the proposed transport routes from a safety and operational perspective will be undertaken, which may result in changes to road geometry, signage, and signalling to mitigate safety risks; • Safe driving training will be provided to all workers operating vehicles and machinery; • Limits for trip duration and arranging driver rosters to avoid fatigue and tiredness will be implemented; • Regular vehicle inspections will be undertaken; and • All road incidents will be reported and investigated by BP in line with the corporate incident management procedures. 	DS
	Chapter 10, Section 10.4.1.4 Spill Prevention and Response Planning	<p>The specific technical and operational control measures in place to minimise the potential for spills during the SWAP 3D Seismic Survey offshore include:</p> <ul style="list-style-type: none"> • Audits of the seismic survey and support vessels will be undertaken to ensure vessels meet relevant BP standards (e.g. condition of the vessel, competence of crew and examination of the vessel Shipboard Marine Pollution Emergency Plan (SMPEP)); • Survey activities will be undertaken compliance with poor weather operational restrictions for vessels in line with BP's existing marine operations and geophysical survey procedures; • Regular maintenance and inspection of equipment and high risk spill points (in particular bunkering hoses, bunds, storage tank valves etc.) will be undertaken; • Chemical selection procedures will be implemented to minimise chemical use; • Strict refuelling procedures to be followed will be implemented and bunkering operations will be supervised at all times for both the seismic and support vessels; • Non-return valves will be installed on fuel transfer hoses; • Regular preventative maintenance to prevent leaks by repairing or replacing equipment such as hoses and tanks will be undertaken; 	DS

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
		<ul style="list-style-type: none"> • Staff training in hazardous materials management, refuelling and waste management roles, as applicable to their roles will be provided; • Implementation of appropriate handling and storage procedures and storage of all hazardous substances within designated areas and in fit for purpose containers (i.e. sealed/hermetic drums) to minimise the risk of leaks and spillage will be undertaken; • Materials Safety data Sheets (MSDS) for all chemicals stored on board will be made available to facilitate efficient spill response; • Reporting of all minor spills will be undertaken to detect underlying trends, and task risk assessments; and • Appropriate spill response and containment equipment will be provided at specific locations based on risk assessment. This will allow rapid response should a spill occur. 	
Spill Prevention, Response, Notification and Close Out Actions Management	Chapter 4, Section 4.6.5 Re-fuelling Chapter 8, Section 8.2 Scoping	<ul style="list-style-type: none"> • The refuelling area at Hovsan Port will be located on an impermeable surface and will include a bund wall capable of holding the content of the fuel tank. The refuelling area will be located away from storm water sewers, channels and water courses and will be protected from weather conditions. The refuelling procedure at the sub-bases will be conducted using drip-trays. 	DS
	Chapter 4, Section 4.6.5 Re-fuelling	Hazardous fuels, oils and chemicals will be securely stored in clearly marked containers in a contained area to prevent pollution.	DS
	Chapter 8, Section 8.2 Scoping Chapter 8, Section 8.5 Impacts to the Terrestrial Environment (In Air Sound) Due to Onshore Survey Activities	All survey vehicles and equipment will be modern and well maintained in accordance with written procedures based on the manufacturer's guidelines, applicable industry code, or engineering standards to ensure efficient and reliable operation.	DS
	Chapter 4, Section 4.8.1.2 Onshore	Hazardous materials will be stored in clearly marked containers at safe locations that are fenced and admittance restricted to authorized personnel.	DS
	Chapter 8, Section 8.2 Scoping	Strict refuelling procedures will be followed.	DS
	Chapter 10, Section 10.4.1.4 Spill Prevention and Response Planning	The seismic contractor and BP will be responsible for ensuring the SMPEP for each vessel is aligned with the relevant AGT Region OSRPs and spill response procedures prior to the survey mobilisation.	Pre-S
	Chapter 10, Section 10.4.1.4 Spill Prevention and Response Planning	<p>Under the AGT spill reporting procedures, all accidental and non-authorized releases (liquids, gases or solids) will be internally reported and investigated. Existing external notification requirements agreed with the MENR will be adopted during the SWAP 3D Seismic Survey are:</p> <ul style="list-style-type: none"> • For liquid releases to the environment exceeding a volume of 50 litres, notification will be made to the MENR within 24 hours after the incident verbally and within 72 hours in the written form; and • If the release to the environment is less than 50 litres, then information about the release will be included into the BP AGT Region Report on Unplanned Releases and sent to the MENR on a monthly basis. 	DS

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
	Chapter 10, Section 10.4.2.2 Leaks and Spills	<p>The specific technical and operational control measures in place to minimise the potential for spills during the SWAP 3D Seismic Survey onshore include:</p> <ul style="list-style-type: none"> • Development and implementation of the SWAP 3D Seismic Survey Spill Prevention, Response, Notification and Close Out Actions Management Plan; • Smaller light vehicles will only refuel at public fuel stations; • Source vehicles and OnSeis units will be either refuelled from a fuel tank at Hovsan Port in a dedicated refuelling area or by fuel truck at one of the sub-bases. The refuelling area at Hovsan Port will be located on an impermeable surface and will include a bund wall capable of holding the content of the fuel tank. The refuelling area will be located away from storm water sewers, channels and water courses and will be protected from weather conditions. Refuelling procedure at sub-bases will be conducted using drip-trays; • Hazardous fuels, oils and chemicals will be securely stored in clearly marked containers in a contained area to prevent pollution; • Regular maintenance of survey equipment and vehicles will be undertaken; • Drip trays will be used when re-fuelling; • Proper fuel nozzles on re-fuelling hoses will be used and shut-off valves will be installed on tanks; • Spill kits and training of crew in the use of spill kits and clean-up will be provided; and • Any contaminated soil caused by spill will be removed and restoration of the areas affected by spills will be undertaken. 	DS
	Chapter 4, Section 4.7.3 Hazardous and Non-Hazardous Waste	<ul style="list-style-type: none"> • Aqueous discharges associated with the onshore seismic survey activities will include sewage, grey and drainage waters generated at the Hovsan Port and sub-bases. These effluents will be discharged to the existing municipal drainage systems in accordance with relevant existing site permits. 	DS
Waste Management	Chapter 4, Section 4.7.3 Hazardous and Non-Hazardous Waste Chapter 8, Section 8.2 Scoping	Offshore all waste streams (including sanitary waste) will be appropriately segregated, stored in fit for purpose containers/tanks on-board the vessels and transferred to waste facilities provided at the main base and the sub-bases.	DS
	Chapter 4, Section 4.7.3 Hazardous and Non Hazardous Waste	Strict handling procedures will be in place for all of the hazardous materials and survey crews will be trained in waste and chemical management.	Pre-S / DS
	Chapter 4, Section 4.7.3 Hazardous and Non-Hazardous Waste	Both hazardous and non-hazardous wastes will be segregated and stored in designated areas and fit for purpose containment at the main base and sub-bases. They will then be sent to BP approved waste management facilities for recycling/reuse, treatment and /or disposal under rigorous Duty of Care protocols.	DS

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
	Chapter 11, Section 11.5.2 Waste Segregation and Transfer	<p>Non-hazardous waste generated offshore will be segregated, compacted and stored onboard vessels, and then transferred to the main base and sub bases. Non-hazardous waste generated onshore will be segregated, compacted and stored at the main base and sub bases (along with waste from offshore) until transfer to BP approved waste management facilities for disposal or recycling.</p> <p>Hazardous waste streams will be segregated and stored separately offshore and onshore to prevent contact between incompatible waste streams. Hazardous waste generated offshore will be stored on board the vessels and transferred onshore to the main base and sub bases (temporary storage), and then onto licensed waste facilities for treatment and disposal. Hazardous waste generated onshore will be stored at the main base and sub bases until transported to licensed waste management facilities for treatment and disposal.</p> <p>Waste streams will be segregated at source to permit reuse/recycling and to avoid contact between incompatible materials. The segregation requirements will be clearly indicated by the use of containers with clear signage denoting the waste types that are suitable for the containers provided.</p> <p>All waste transfers will be accompanied by individual Waste Transfer Notes (WTNs), confirming the waste type, quantity, waste generator, consignee, consignor (if different from the generator) and in the case of hazardous wastes, Material Safety Data Sheet (MSDS) and Waste Passports, where required. A final visual inspection of all waste consignments will be made prior to transfer note sign-off and uplift. Copies of the waste transfer documentation together with other relevant information e.g. MSDS, Waste Passports, will be retained by the waste generator. All parties involved in transporting wastes will retain a copy of the WTN.</p> <p>Hazardous Waste Passports are required for the transportation of hazardous wastes from BP operated facilities to non-BP operated Waste Disposal Contractor facilities within Azerbaijan.</p> <p>Depending upon the nature of the waste and the approved method of recycling/disposal, wastes may be routed via the Central Waste Accumulation Area (CWAA), waste transfer station or similar facility, or alternatively may be routed directly to their final approved destination.</p>	DS
	Chapter 4, Section 4.7.3 Hazardous and Non-Hazardous Waste / Chapter 8, Section 8.2 Scoping Chapter 11, Section 11.5 Waste Management	Waste management will be undertaken in line with the national regulatory requirements, good international industry practices, BP's AGT Regional Waste Manual and the 3D Seismic Survey Waste Management Plan.	DS
	Chapter 11, Section 11.5.1 Waste Management Processes and Procedures	A Waste Management Plan will be developed and maintained to cover the duration of the SWAP 3D Seismic Survey; and will address the anticipated waste streams, likely quantities and any special handling requirements.	Pre-S / DS
	Chapter 11, Section 11.5.1 Waste Management Processes and Procedures	A schedule of internal audits will be developed to objectively monitor the performance of the waste management systems during the SWAP 3D Seismic Survey and to ensure that all corrective actions and improvements are identified and implemented.	DS

Theme	Reference	Detailed Requirement Text	Execution Stage ¹
	Chapter 11, Section 11.5.1 Waste Management Processes and Procedures	The SWAP 3D Seismic Survey Contractor will receive waste management training covering: <ul style="list-style-type: none"> • Identification of waste types and potential associated hazards; • Waste segregation; and • Waste transfer documentation (if involved in waste movement). 	Pre-S
	Chapter 11, Section 11.5.1 Waste Management Processes and Procedures	<ul style="list-style-type: none"> • All new waste disposal routes must be routinely assessed prior to use and be compliant with applicable local laws and regulations. Waste will only be routed to those waste disposal facilities that have been approved for use by the AGT Region. 	DS
	Chapter 10, Section 10.4.1.2 Release of Chemicals / Waste	Waste streams generated during the seismic survey activities will be stored on board in dedicated containers.	DS
	Chapter 8, Section 8.2	Onshore, hazardous and non-hazardous wastes will be segregated and stored in designated areas and fit for purpose containment at the main base and sub-bases. Waste will then be sent to BP approved waste management facilities for recycling/reuse, treatment and /or disposal under rigorous Duty of Care protocols.	DS