

Annex A

Consultation Report

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A1 INTRODUCTION

A1.1 BACKGROUND

This Consultation Report summarises the consultations undertaken as part of the Environmental Impact Assessment (EIA) for Phase 1 of the Jubilee Field development offshore Ghana. It is based on the Public Consultation and Disclosure Plan (PCDP) for the EIA which forms part of Tullow's wider and longer term stakeholder engagement plan which is being developed within its Corporate Social Responsibility (CSR) strategy. An outline of the developing CSR strategy is presented in *Chapter 2*.

Stakeholder consultations undertaken during the EIA were led by the Tullow project team, on behalf of all of the Jubilee Joint Venture partners, with the EIA team (ERM and its partner ESL Consulting) providing support to address issues relevant to the EIA process.

Stakeholder consultations during the EIA had the following main objectives.

- To facilitate an open and inclusive approach to consultation that provided timely and transparent information on the project to stakeholders.
- To provide an opportunity for stakeholders to provide feedback on the project and to voice their concerns.
- To gather baseline environmental, health and social data held by stakeholders.
- To aid project planning and development of mitigation measures and monitoring plans to address issues raised.

This Consultation Report provides a record of consultation activities for the EIA which commenced with Scoping in November/December 2008 and were completed with disclosure of the Draft EIA in August 2009 and Public Hearings in October and November 2009 prior to submission of the Final Environmental Impact Statement (EIS) to the Environmental Protection Agency (EPA) at the end of November 2009.

This remainder of this document is structured as follows.

- *Section 2: Stakeholder Engagement Standards* outlines Ghanaian requirements, IFC requirements and Tullow's CSR strategy.
- *Section 3: Project Stakeholders* provides an overview of the process followed to identify and define key project stakeholders.
- *Section 4: Project Consultation and Disclosure Plan* details the stakeholder consultation process followed to date, and the proposed plan for consultation on the EIA and for disclosure.

Appendices include:

<i>Appendix I</i>	Stakeholder Database
<i>Appendix II</i>	Issues Register
<i>Appendix III</i>	Background Information Document
<i>Appendix IV</i>	Consultation Tools and Outputs

A2.1 GHANAIAN REQUIREMENTS

The EIA Regulations (1999) address the need for stakeholder engagement during the EIA process. There is a requirement for a scoping notice to be advertised to relevant ministries and in at least one national and one local newspaper. Copies of the scoping report must be made available for inspection by the general public in the project locality.

Once the EIS is published it must be advertised and made available to the general public, public agencies, organisations, NGOs, Metropolitan, Municipal and District Assemblies and local communities and mechanisms put in place so that consultees can make comments and suggestions on the project. There is also provision within the Regulations for the EPA to hold public hearings if there is an adverse public reaction to the project, there is the need for resettlement, or the project could have extensive effects on the environment.

A2.2 INTERNATIONAL FINANCE CORPORATION STANDARDS

The International Finance Corporation (IFC) performance standards, which have been effective since April 30 2006, include guidelines for consultation and disclosure. *Box A2.1* outlines the main requirements for consultation and disclosure under Performance Standard 1 (*Social and Environmental Assessment and Management System*) for IFC funded projects.

The guidelines include requirements for:

- free, prior and informed participation of affected communities;
- verification of broad community support for the project within the affected communities;
- preparation of an Action Plan⁽¹⁾ derived from consultation;
- disclosure of the Action Plan to affected communities and provision of periodic reports on its implementation;
- disclosure of any updated measures and actions to address issues of concern to affected communities;
- more comprehensive and on-going information disclosure⁽²⁾ and consultation with affected communities at a level commensurate with the project's risks and impacts; and
- a grievance mechanism by which people affected by the project can bring their comments, concerns and grievances to the project sponsor, in a culturally appropriate manner, for consideration and redress.

The World Bank Group's Environmental Assessment Policy (OP 4.01) (1999) addresses the requirement for stakeholder consultation as part of the EIA

(1) Included as part of the Environmental Management Plan

(2) Moving away from consultation "at least twice" to ongoing and iterative consultation.

process. The key principals of the World Bank Operation Policies have been incorporated into the IFC performance standards.

Box A2.1 *IFC Performance Standards for Public Consultation and Disclosure*

Aims:
To ensure that affected communities are appropriately engaged on issues that could potentially affect them; to build and maintain a constructive relationship with communities; and to establish a grievance mechanism.

Who to Consult
Specifically with:

- directly and indirectly affected communities;
- positively and negatively affected communities/ individuals;
- disadvantaged and vulnerable groups;
- those with influence due to local knowledge or political influence;
- elected representatives;
- non elected community officials and leaders;
- informal/ traditional community institutions and/or elders; and
- communities in the wider area of influence.

When to Consult
As early as possible or at the latest consultation should begin prior to construction. Consultation should be an ongoing process throughout the life of the project ie iterative.

What to Consult on
Specifically:

- disclosure of project information (purpose, nature, scale);
- risks and impacts of the project; and
- proposed mitigation.

How to Consult
Consultation should be:

- inclusive and culturally appropriate;
- in the language preferred by the affected communities;
- include the needs of disadvantaged and vulnerable groups;
- fed into the decision making process including proposed mitigation, sharing of benefits and opportunities;
- iterative;
- documented;
- responsive to community concerns and grievances; and
- easily understood and transparent.

Source: IFC Performance Standard 1 (paragraphs 19-23), 2006.

A2.3 *TULLOW'S CORPORATE REQUIREMENTS*

Tullow has made a commitment to open and transparent dialogue with as broad a range of stakeholder groups as is achievable, including communities and groups that have an interest in or may be affected by the project. The aim of Tullow's stakeholder engagement strategy is to ensure a consistent, comprehensive and coordinated long-term approach to stakeholder consultation for its hydrocarbon production activities in Ghana. Tullow recognise that consultations during the EIA process are a first step in the ongoing consultation process throughout the field development lifecycle.

Tullow's commitment to stakeholder consultations is stated within its Corporate Social Responsibility and Environmental, Health and Safety policies. The key elements of these policies are provided in Box A2.2.

Box A2.2 ***Excerpt form Tullow CSR and EHS Policies***

"Tullow is committed to continuous improvement in all its standards and practices. Tullow Oil's policy is to conduct all our business operations to best industry standards and to behave in a socially responsible manner. Our goal is to behave ethically and with integrity in the communities where we work, and to respect cultural, national and religious diversity".

"At Tullow Oil, we are committed to high standards of Environment, Health and Safety (EHS) performance across our business. Our goal is to preserve biodiversity and promote sustainable development by protecting people, minimising harm to the environment and reducing disruption to our neighbouring communities. We seek to achieve continuous improvement in our EHS."

Tullow Oil has established an EHS management system to ensure that:

- We plan and organise EHS efficiently and effectively.*
- Safe places, safe systems of work and suitable procedures are provided and maintained.*
- We aim to minimise discharges, emissions and waste that adversely affect the environment. Staff and contractors are given appropriate EHS training to perform their tasks competently, safely and with due regard for the environment.*
- Risks from our activities are assessed and either eliminated or reduced to acceptable levels.*
- We comply with all applicable EHS laws and regulations, and apply responsible standards where the legislation is inadequate or non-existent.*
- We are comprehensively prepared to respond effectively in the event of an emergency.*
- We promote a culture of reporting and investigating accidents, incidents and near misses and the sharing of lessons learned.*
- We have an audit programme which verifies compliance with this policy and monitors our EHS performance.*
- We are all empowered to stop any activity if there is an unacceptable risk of accident or environmental incident.*

Tullow, in conjunction with the Joint Venture Partners, Government agencies and key stakeholders, is developing a framework plan for implementation of its CSR investment programme. The programme focuses on four key areas, namely health, education, enterprise development and biodiversity. The objectives for each of the areas of focus are outlined in Table 2.1.

Table A2.1 Strategic Focus Areas

Objective	Potential areas for action
Health: To promote and foster wellbeing of the impacted communities.	<ul style="list-style-type: none"> • Endemic and communicable diseases, prevention • Primary Health Care education • Capacity building for service delivery • Training of health workers
Education: To improve the educational standards in the Region.	<ul style="list-style-type: none"> • Entrepreneurial and skills training • Physical infrastructure provision • Teacher training programmes • Teaching and learning materials • Establishment of an education fund
Employment: To encourage diverse programs and initiatives that will create jobs, skills and enterprises	<ul style="list-style-type: none"> • Promotion of Alternative livelihood projects • Ecotourism promotion • Service industry revitalisation • Diversification of economic base • Incentives for private sector investments • Value additions to fishing and farming
Natural Resource Governance: To maintain efficient resource governance to ensure sustainability of the limited resources at the community level	<ul style="list-style-type: none"> • Management of scarce natural resources • Development of guide lines for resource utilisation • Capacity building for governance leadership • Prevention of pollution and impacts on Threatened species

Planning for CSR programmes and projects delivery will be an iterative process which involves the following three stages.

1. **Identification.** The first stage will involve a background study to identify possible CSR projects/programmes. This will require characterising the study areas in terms of its location, socio-economic issues and government and traditional systems, understanding the legislative framework, assessing opportunities and constraints and abstracting lessons learnt from previous activities.
2. **Preparation and Design.** This stage will involve designing a set of operational proposals which are technically, economically and financially feasible, including defining the scope of the programme/project identified, undertaking a resource, options and financial costs and benefits analysis.
3. **Appraisal and Selection.** This stage will involve a comprehensive and systematic review of all aspects of the programme/project proposals using pre-defined selection criteria and checklists. Each proposal will be scored according to these criteria to determine whether it is eligible for funding or not and whether further modifications are required before a final decision is reached.

Consultation and communication with key stakeholders is an important component of the CSR programme. To ensure effective implementation, CSR programmes/projects will conform to the existing organisation of socio-cultural, administrative and indigenous governance systems. A Social Responsibility Committee (SRC) will be established that will include key

stakeholder's representatives to ensure effective communication and conflict resolution. Project stakeholders that may benefit from Tullow's CSR programme will comprise three broad categories namely:

- Sekondi-Takoradi stakeholders;
- Coastal district villages and communities (115); and
- Formal and informal fishing industry, including the Department of Fisheries.

Monitoring and evaluation of the CSR programme and project delivery will be a continuous activity and details are defined in the CSR framework. In assessing the effectiveness of the CSR activities, economic, social, health and environmental impacts will be considered. A grievance mechanism will be established to ensure that affected communities and groups have the opportunity to voice their concerns and that there is a transparent process to address such concerns.

A3 PROJECT STAKEHOLDERS

A3.1 STAKEHOLDER IDENTIFICATION

Stakeholders were defined as individuals or groups potentially affected by the project or can themselves affect the project. A stakeholder database (*Appendix I*) was developed including all stakeholders identified through initial consultations that may be directly or indirectly affected by the project or may have an influence on the project. The database includes a list of stakeholders and a register of consultation activities during the EIA. *Box 3.1* outlines the key categories of stakeholders identified, categorised by type eg National and Regional government and interested parties.

Box A3.1 Key Project Stakeholders

Stakeholders were identified from the following categories.

- *National government*: these stakeholders are of primary national political importance to the project and the EIA process.
- *Regional government and District Assemblies*: these stakeholders are of Regional and local importance to the project.
- *Directly affected communities*: communities at local level that will directly impacted (positive and/or negative) by the project. This category also includes traditional leadership in the directly affected communities.
- *National and Local NGOs*: these are local NGOs (based mainly in Accra) with potential interests in the project. NGOs may also have useful data or insights into the local and national issues raised by the project.
- *Community Based Organisations and Groups*: These are civil society non-profit groups that operate within a single local community that may have an interest in the project. Other community groups include associations for people working in a particular trade in a community.
- *International organisations*: these comprise organisations based within and outside Ghana with an interest in the project. These include NGOs, multilateral and bilateral organisations.
- *Academic institutions*: these are universities, colleges and research organisations which may have an interest in the project and may be able to provide useful baseline information related to the culture, history, or environment of the area.
- *Other interest groups*: these comprise, for example, media (both national and international), and political parties/groups, religious organisations.
- *Economically interested parties*: organisations, businesses and individuals with direct interest in the project eg running businesses or providing services and supplies to the project.

A3.2 CONSULTATION AND ISSUES TRACKING

A register has been maintained of all stakeholder engagement activities associated with the project, including minutes of stakeholder meetings. Issues raised by stakeholders have been tracked through the EIA process and responses to these issues are reported in the EIS. A register of issues raised is listed in *Appendix II*.

A4 PUBLIC CONSULTATION AND DISCLOURE

A4.1 INTRODUCTION

The Public Consultation and Disclosure Plan (PCDP) covers consultation up to the determination of the EIA and was divided into two key stages.

- Stage 1: Scoping.
- Stage 2: Undertaking the EIA and Disclosure.

The objectives and activities relating to each stage are provided below and summarised in *Table A4.5* at the end of this section.

Ongoing stakeholder engagement activities planned during the construction, operational and decommissioning phases of the project will be included in Tullow's longer term stakeholder engagement strategy for the project. This strategy does not form part of the EIA, however, it will build on the work undertaken during the EIA process and will form part of the Environmental Management Plan (EMP) for the project. An outline of the planned activities is presented in *Section 4.4* and summarised in *Table A4.5*.

A4.2 STAGE 1: SCOPING

A4.2.1 Objectives

The objectives of consultations at the scoping stage were:

- to identify potential key stakeholders;
- to develop consultation tools (eg the Stakeholder Register); and
- to consult with key strategic stakeholders and introduce the project, obtain baseline data and identify key issues.

A4.2.2 Activities

Initial Consultations

Initial consultations were undertaken by the EIA team and Tullow in November and December 2008 with key, mainly government, stakeholders with bodies with a high level interest in the project such as Ghana EPA, Ministry of Energy, Ministry of Fisheries, Ghana National Petroleum Company and Ghana Navy. These initial meetings served to introduce the project, obtain information on potential stakeholders, identify sources of information, and identify key issues. Outputs from the consultations were fed into to the Scoping Report and informed the rest of the EIA process. *Table 4.1* provides a list of initial meetings and minutes of these meetings are attached in *Appendix IV*.

Table A4.1 Initial Consultation Meetings (Nov/Dec 2008)

Organisation	Date	Location	Attendees*
Ministry of Fisheries	30 November 2008	Accra	1
Ghana Maritime Authority (GMA)	30 November 2008	Accra	1
Ghana Ports and Harbours Authority (GPHA)	27 November 2008	Tema	1
Naval Headquarters, Burma Camp	4 December 2008	Accra	1
Ministry of Energy	4 December 2008	Accra	1
Ghana National Petroleum Company (GNPC)	30 November 2008	Accra	2
Friends of the Earth (Ghana)	2 December 2008	Accra	2
Total Meetings = 7			9

Scoping Report

A Scoping Report was produced and submitted to the EPA on 17 December 2008. The EPA reviewed the Scoping Report and issued a letter on 3 February 2009 to inform Tullow that the EIA could proceed and specified a series of issues to be addressed in the EIA. The Scoping Report outlined the PCDP and included a list of organisations consulted during scoping.

Advertisement

Following the EPA's approval of the Scoping Report, it was advertised to Government Ministries and the general public (through newspaper advertisements) and comments were sought on the scope of the planned EIA.

Advertisements were published in the following newspapers and included details of where copies of the Scoping Report could be obtained for review:

Ghanaian Times: 4, 5, 25, 26 February 4 and 5 March 2009

The Daily Graphic: 3, 5, 10, 12, 17 and 19 March 2009

A copy of the advertisement is attached in *Appendix IV*.

Disclosure of Scoping Report

Copies of the Scoping Report were placed at the following locations for public review and comment.

- EPA library, Accra (3 copies);
- Tullow Offices, Accra (2 copies);
- ESL Offices, Accra (1 copy);
- Tullow Offices, Takoradi (1 copy); and
- Sekondi Public Library (1 copy).

Copies of the Scoping Report were also delivered to key stakeholder groups that were met during the Scoping consultations as well as stakeholders consulted during the EIA phase. In total, approximately 30 copies of the Scoping Report were handed out to stakeholders (*Appendix I*).

Project Website

A website was created with up-to-date information on the Jubilee Phase 1 Development and the EIA process. Copies of the Scoping Report and the BID (see *Appendix III*) were made available to be downloaded from the website. The URL for the website is www.erm.com/tullowjubilee.

A4.3 STAGE 2: UNDERTAKING THE EIA

A4.3.1 Objectives

The main objective of consultations during the EIA process was to share project information with a wide range of stakeholders, to obtain baseline information and discuss and address potential issues. Although there was a high level of public awareness about the project in general, consultations during the EIA provided an opportunity to disseminate more detailed information about the purpose, nature, location and duration of the various project activities. In addition, information was provided on the EIA process and potential positive benefits and negative impacts associated with the project.

A4.3.2 Activities

Background Information Document

To facilitate effective consultations a Background Information Document (BID) was produced and circulated at stakeholder meetings (see *Appendix III*). The BID was written in non technical language with photographs and graphics to illustrate the main project components. It was designed to inform stakeholders about the project and included the following.

- A description of the purpose, nature, scale and duration of the proposed project.
- A summary of legal framework and requirements applicable to the project and the EIA.
- An outline of the main risks, impacts and potential benefits of the project.
- Contact details of the EIA team and project proponent and an invitation to provide comment.

Copies of the BID were made available to stakeholders to read and to pass onto others with an interest in the project at meetings and provided to other stakeholders on request. During the consultation period, approximately 210 copies of the BID were handed out to stakeholders. Copies were left in libraries and other publicly accessible places. The BID was written in English and copies were made available online on the project website. The use of graphics allowed this document to be used as an illustrative tool in consultation meetings with

non English readers/speakers and those who are illiterate. The consultation team also included translators who speak Fante and Nzema so that the key elements of the project and the main issues arising could be discussed with non English speaking stakeholders.

Consultation Meetings

The EIA team continued and widened the consultation process to obtain information and concerns to inform the EIA through a series of face-to-face meetings with additional individual stakeholders and stakeholder groups in Ghana at national, regional and local levels.

National and Regional Meetings. Meetings were held with key national and regional stakeholders (eg government Ministries and Departments and international, national organisations such as NGOs and other interested parties with information of the area). Some meetings were held with individual organisations and others with groups of organisations with shared interests.

District Level Meetings. Meetings with key district level stakeholders were undertaken including District and Metropolitan Assemblies. District level consultation focussed on the six coastal districts in the Western Region, namely:

- Shama (Shama);
- Sekondi-Takoradi Metropolitan (Takoradi);
- Ellembelle (Nkroful);
- Ahanta West (Agona);
- Nzema East (Axim); and
- Jomoro (Half Assini).

A meeting was held with the Sekondi Paramount Chieftaincy.

Local Meetings. Meetings were held at the local level with representatives of the directly affected communities (eg chief fishermen) and local NGOs. Approximately 100 individuals attended these meetings representing a wide range of community interests.

A total of 26 meetings involving approximately 259 people were held at national, regional, district and local level during the EIA phase between February and May 2009. *Table A4.2* provides a list of meetings that were held, dates, meeting location, number of attendees. A map showing the locations of these meetings is provided in *Figure 4.1*. Meetings minutes, presentation materials, lists of attendees at meetings and photo records are included in *Appendix IV*.

Table A4.2 Stakeholder Consultation Meetings

Organisation	Date	Location	Attendees*
National Government			
Ghana Ports and Harbours Authority	5 February 2009	Tema	2
Ghana Maritime Authority	6 February 2009	Accra	1
Directorate of Fisheries	6 February 2009	Accra	5
Regional Government and District Assemblies			
Environmental Protection Agency	9 February 2009	Sekondi	3
Department of Fisheries	10 February 2009	Takoradi	2
Ghana Ports and Harbours Authority, Takoradi Port	10 February 2009	Takoradi	3
Shama District Assembly	11 February 2009	Shama	9
Sekondi-Takoradi Metropolitan Assembly	11 February 2009	Sekondi	19
Ellembelle District Assembly	12 February 2009	Nkroful	10
Ahanta West District Assembly	13 February 2009	Agona	10
Nzema East District Assembly	13 February 2009	Axim	14
Jomoro District Assembly	16 February 2009	Half Assini	10
Regional Coordinating Council	2 June 2009	Sekondi	40
Paramount Chief			
Sekondi Paramount Chieftaincy	14 February 2009	Sekondi	5
Fishermen			
Canoe Fishermen's Council	17 February 2009	Takoradi	2
Chief Fishermen	17 March 2009	Takoradi	77
National and Local NGOs			
Conservation Foundation	16 February 2009	Agona	1
Ricerca e Cooperazione	16 February 2009	Agona	1
Evangelical Charity Foundation	16 February 2009	Takoradi	3
Friends of the Nation	17 February 2009	Takoradi	2
Western Region Association for NGOs	17 February 2009	Takoradi	20
Ghana Wildlife Society	18 February 2009	Takoradi	1
Wassa Association of Communities Affected by Mining (WACAM)	18 February 2009	Tema	1
Western Region NGOs	13 May 2009	Takoradi	16
International Organisations			
Care International	18 February 2009	Accra	1
Conservation International	18 February 2009	Accra	1
Total Meetings = 26			259

* Excludes attendance by Tullow and EIA team representatives. Full details provided in attendance registers attached in *Appendix IV*.

Figure A4.1 Meeting Locations



Disclosure of Draft EIS

Disclosure of the Draft EIS provided detailed information about the proposed project activities, the assessment of the impacts and the planned mitigation and monitoring measures. Twelve copies of the Draft EIS were issued to the EPA on 5 August 2009. EPA's official public announcement that the EIS is available for a 21-day public comment was published in The Daily Graphic and Ghanaian Times on 20 August 2009. In addition, nine copies of the Draft EIA report were hand delivered on 18 August 2009 to the following stakeholders for public review.

1. Ahanta West District Assembly
2. Ellembelle District Assembly
3. Jomoro District Assembly
4. Nzema East Municipal Assembly
5. Regional Coordinating Council (Western)
6. Regional EPA Office
7. Sekondi-Takoradi Metropolitan Assembly
8. Shama District Assembly
9. Western Region Coalition of NGOs

Electronic copies of the Draft EIS were available on CD and an Executive Summary of the Draft EIS in English was made available on request. Copies of the EIS are also available for download from the project websites (www.erm.com/tullowjubilee and www.tulloil.com).

Public hearings are an essential step for the review process of the Draft EIS, as per the EIA Regulations. District hearings were held in the Western Region coastal districts between 14 and 24 September 2009 and a public hearing was held for the Western Region House of Chiefs on 12 November. These meetings were conducted in Fante and Nzema. A national hearing, in English, was held in Accra on 13 November 2009. In total, the eight public hearings were attended by approximately 3,600 stakeholders. A schedule of the meetings held and summary of attendance is provided in *Table A4.3*.

Following public hearings the EPA comments received on the Draft EIA were addressed and incorporated in the Final EIS for submission to the EPA. A register of issues raised is listed in *Appendix II*.

Table A4.3 *Schedule and Attendance of Public Hearings*

Hearing/ Location/Venue	Date	Number of Attendees*	Groups attended
Jomoro District Half Assini, District Assembly Compound	14 September	675	Distillers Association, Disable Association, Nzema Youth Association, MYF, AEC, GPRTU, Clergy, Hasco, Catholic Youth Association, Traditional Authority, fishermen, tailors and dressmakers, Muslims, outboard motor, oil and gas association, GNAT, chemical association, security service, heads of departments, Assembly Members, Press
Nzema East Municipality Axim, Victoria Park	15 September	569	Gwira Traditional Area, Nsien Axim Traditional Area, Ajomoro Traditional Area, Lower Axim Traditional Area, Upper Axim Traditional Area, Fishermen (lower Axim), Awuku & Ahonu Youth, Council of Churches, GES-Axim, Axim Garages, Muslims, national youth, Nyamebeleyese Chief Farmers, Chemical Sellers Association, Kegyina youths association, Inter-Generational Initiative Programme, NGOs, the press
Ahanta West District	16 September	676	Busua Area Council, Abure electoral area, Adjumako/ Mpatase Electoral Area, Ewusiejoe Area Council, Aketakyi Area Council, Agona Area Council, Chiefs and Queen mothers of Ahanta Traditional Area, Azani Student Union, Dixcove Area Council, Apowa Area Council, GES, Market women, fishermen, farmers, tailors and dressmakers association, market women, Muslims, clergy, GPRTU and the press

Hearing/ Location/Venue	Date	Number of Attendees*	Groups attended
Shama District, Shama, Methodist Park	17 September	568	Shama District Assembly, Electoral Commission, BNI, GES, Assembly members, NCCE, Chiefs and Elders, Unit Committee Members, GPRTU, Shama Youth Development Association, Fishermen, Market Women, Moslems, Clergy, Students of Shama Senior High school, Cran (NGO), MOFA, Security Service, the press
Sekondi Takoradi Metropolis	18 September	200	Press, Assembly members, NADMO, Government appointees, association of garages, GNIDA, traditional leaders, MCE, NGOs, Seamen Union
Ellembelle District	24 September	650	Nyame Bekyere Farmers Association, Zoomlion. Traders Association, masons association, Fish mongers Association, Fishermen Association, Drivers Association, Traders Unit Committee Members, District assembly staff, heads of departments, 31st December Women Movement, traditional leaders, disable association, pensioners association, NGOs, hairdressers association, seamstress association, students groups, press
Western Region House of Chiefs, Takoradi	25 September	92	Awulae Attibrukusu III - Lower Axim Osagyefo Kwamina Enimil VI - Wasa Fiase Awulae Kweku Akyirisuo III - Ajomoro Awulae Agyefi Kwame II -Nsien Nana Kweku Binna III - Shama Ogyeahoho Yaw Gyebi II - Sefwi Anhwiaso Awulae Annor Adjaye III - Western Nzema Nana Nkuah Okompom II - Sefwi Wiawso Nana Kobina Nketsia V - Essikadu Awulae Angma Tu-Agyan II - Gwira Okogyeman Kwaku Gyampra III - Sefwi-Chirano Nana Ngissa Boadi - Rep. Aowin Nana Amoaku Agyebu - Rep. Lower Dixcove Nana Tsetse Appou II - AE. President-Sekondi Nana Essaua Ekyir II - AE. President-Upper Dixcove Nana Nwia Amponsah IV - Rep. Eastern Nzema Nana Kwaw Tentele - Upper Axim AE. President

Hearing/ Location/Venue	Date	Number of Attendees*	Groups attended
National Hearing, Accra	13 November 2009	Approx 200	GNPC, GMA, NGOs, Ghana Police, GPHA, Tema Oil Refinery, business community, Department of Wildlife, Ghana Chamber of Commerce, Ghana National Fire Service, Ghana Wildlife Society, Ghana Navy, Ghana air force, Ghana Institute of Engineers, Ministry of Energy, Ministry of Environment Science and Technology, Fisheries Commission, Regional Maritime University, Department of Oceanography, University of Ghana

* Excludes attendance by Tullow and EIA team representatives.

Consultation with District Planning Officers

In response to the EPA's comments regarding augmenting the socio-economic baseline information in the Draft EIA, the EIA team undertook a series of meetings with district officials to obtain more up-to-date socio-economic data for the six coastal districts. More recent sources of information collected included district maps, district water and sanitation development plans, district health annual reports and sub-metro community business and development plans for STM. Information was also recorded through interview where it was not available from existing sources. As summary of the meetings held is provided in *Table A4.4* and attendance registers and photos of meetings are attached in *Appendix IV*.

Table A4.4 *Socio-economic Data Gathering (November 2009)*

Date	District	Official
18 November	Shama District Assembly	Mr IB Ankomah, development planning
	Ahanta West District Assembly	Mr Abdulah Zakari, DCD Dr Sunderland, health Mr Felix Agah-Kuofie, education
19 November	Sekondi_Takoradi Metro	Mr Henry Owusu, development planning Mr Brenyah Kwame, health Mr E Dadzie-Paintsil, physical planning
	Ellembelle District Assembly	Mr Derrick Obeng, development planning
	Nzema East District Assembly	Mr FDKA Ameko, development planning
20 November	Jomoro District Assembly	Mr D Achempong, development planning Mr Joseph Yankson, physical planning

A4.4 *ONGOING ENGAGEMENT*

A4.4.1 *Objectives*

The objective in this phase is to develop stakeholder consultation strategies to provide ongoing engagement through project implementation to decommissioning. Building relationships with local community stakeholders allows for effective project information sharing that can identify further opportunities to deliver local economic benefits, and facilitates the management of disputes and grievances.

A4.4.2 *Activities*

Ongoing engagement will be led by Tullow, on behalf of all of the Jubilee Joint Venture partners, and specific strategies will be developed for individual stakeholder groups to elicit feedback. Mitigation measures will be monitored and adjusted as required to address government and community concerns. The CSR investment programme will be implemented and communicated and a Social Responsibility Committee (SRC) set up as per the plan. The Tullow CSR team will be resourced to ensure that commitments are met and improvements are made as the project progresses through its lifecycle.

National Regional and Local Government. Engagement with Government departments and other key stakeholders will continue during this phase to ensure that all key regulators at a national, regional and local level are engaged and participate in the implementation of the project. District assemblies will be consulted to ensure that CSR activities are coordinated with district development plans.

NGOs and CBOs. Interaction will involve coordination with NGOs, CBOs and other community groups to ensure the implementation of mitigation strategies as required and to maintain transparency post disclosure of the EIS.

Local Communities. Tullow's CLOs will meet community representatives at local level in areas potentially affected by the project. The purpose of these meetings would be to provide project updates, answer questions about the planned operations and elicit feedback on local concerns and issues. The grievances procedure would also be communicated.

Economically affected parties. Any directly affected parties eg fishermen and local businesses will be consulted during the project and ongoing consultations will be maintained by the CLO.

Table A4.5 Summary of Completed and Planned Consultation Activities

Phase	Objectives	Timeline	Stakeholders	Activities	Tools
Stage 1: Scoping	<ul style="list-style-type: none"> • Identify key stakeholders and their influence and interest in the project • Consult with National, Regional and Local Government officials • Collect baseline data • Disclosure of Scoping Report 	<p>During project initiation and scoping phase.</p> <p>November/December 2008</p>	<ul style="list-style-type: none"> • National level government • International and national organisations: NGOs <i>etc</i> 	<ul style="list-style-type: none"> • Initial stakeholder Register • Meetings with key stakeholders to introduce the project. • Secondary data collection and desk-top studies • Produce Scoping Report, Advertise and obtain comments 	<ul style="list-style-type: none"> • Stakeholder Register • Project description • Project maps • Newspaper Adverts
Stage 2: EIA and Disclosure	<ul style="list-style-type: none"> • To provide information on the project to national, regional and local stakeholders and obtain specific comments on scoping report. • To obtain baseline data and discuss key issues with specialists in key areas (eg fisheries, coastal sensitivities and cultural issues). • Develop appropriate mitigation measures and identify benefits for local economic development. 	<p>During EIA and following drafting of the EIS.</p> <p>January to November 2009.</p>	<ul style="list-style-type: none"> • National, Regional and Local level government • District Assemblies • Directly affected communities at local level • International and National organisations: NGOs, media <i>etc</i> 	<ul style="list-style-type: none"> • National and Regional individual meetings • District level meetings. • Fishers and NGO meetings. • Publish the Draft EIA and obtain comments from stakeholders • Plan and attend Public Hearings • Issue Final EIA to EPA addressing comments on Draft EIA 	<ul style="list-style-type: none"> • Background Information Document (BID) • Project presentation (including maps) • Individual and Group discussions at local level • EIS and Non Technical Summary (NTS).
Ongoing Engagement	<ul style="list-style-type: none"> • Develop stakeholder relationships • Provide regular information on the project at national, regional and local level. • Monitor mitigation measures and adjust mitigation as appropriate in line with concerns • Identify benefits for further local economic development • Manage disputes/grievances 	<p>Starts prior to commencement of the installation and continues through the operational phase.</p> <p>December 2009 onwards</p>	<ul style="list-style-type: none"> • National, Regional and Local level government • District Assemblies • Directly affected communities at local level • International and National organisations: NGOs, media <i>etc</i> 	<ul style="list-style-type: none"> • Meetings with local representatives to share project information, and discuss planned activities. • Monitoring programme • CSR investment programme and SRC set up. • Implementation of grievance mechanism 	<ul style="list-style-type: none"> • Community Liaison Officer training • Individual and Group discussions at local level • Project progress reports • Grievance procedure

Appendix I

Jubilee Field Phase 1
Development:

Stakeholder Database

	Organisation	Contact person	Stakeholder meetings		BID	Scoping Report
			Nov - Dec	Feb -May		
1	Environmental Protection Agency	D. S. Amlalo	28/11/2008	-	-	-
2	Environmental Protection Agency	S. E. Anku	28/11/2008	-	-	-
3	Environmental Protection Agency	Nana Ando	-	03/02/2009	2	3
4	Environmental Protection Agency	Ebenezer Sarpong	-	03/02/2009	-	-
5	Environmental Protection Agency	Kojo Agbenor-Efunam	-	03/02/2009	-	-
6	Ghana Maritime Authority	Captain Kofi Ishmael Micah	-	06/02/2009	1	1
7	Ghana Maritime Authority	Captain E. R. Komonn	30/11/2008	-	-	-
8	Ghana Navy	Captain E. A Bonsu	04/12/2008	-	-	-
9	Ghana Ports and Harbours Authority	Richard Deih	27/11/2008	05/02/2009	1	1
10	Ghana Ports and Harbours Authority	Harry Barnes-Dabban	27/11/2008	05/02/2009	-	-
13	Ministry of Energy	Dr M Apiagyei Gyamfi	04/12/2008	-	-	1
14	Directorate of Fisheries	Alfred Y Tetebo	26/11/2008	06/02/2009	2	2
15	Directorate of Fisheries	Michael J Cornelius	27/11/2008	06/02/2009	-	-
16	Directorate of Fisheries	Setor Avoke	28/11/2008	06/02/2009	-	-
17	Directorate of Fisheries	Lionel Awily	29/11/2008	06/02/2009	-	-
18	Directorate of Fisheries	George Hutchine	30/11/2008	06/02/2009	-	-
19	Ghana Petroleum Company	Francis Ackah	30/11/2008	-	-	1
20	Ghana Petroleum Company	Phlomena Donkoh	30/11/2008	-	-	-
21	Friends of the Earth	George Awudi	02/12/2008	-	-	-
22	Friends of the Earth	Noble Wadzah	02/12/2008	-	-	-
23	Environmental Protection Agency	Irene Heathcote	-	-	-	-
24	Environmental Protection Agency	Alfred Ayah	-	09/02/2009	2	1
25	Environmental Protection Agency	George Diawuoh	-	09/02/2009	-	-
26	Environmental Protection Agency	Kofi Eshun	-	09/02/2009	-	-
27	Ghana Ports and Harbours Authority	Jacob Hyde-Cooper	-	10/02/2009	2	1
28	Ghana Ports and Harbours Authority	Captain E Afadzi	-	10/02/2009	-	-
29	Ghana Ports and Harbours Authority	Peter Amro-Bediako	-	10/02/2009	-	-
30	Regional Fisheries Department	Daniel Awaku-Nyanteh	-	10/02/2009	-	-
31	Regional Fisheries Department	Alexander Addo	-	10/02/2009	2	1
32	Shama District Assembly	Joseph Amoah	-	11/02/2009	9	1
33	Shama District Assembly	David Gorman Hammond	-	11/02/2009	-	-
34	Shama District Assembly	Isaac Ankumah	-	11/02/2009	-	-
35	Sekondi-Takoradi Metropolitan Assembly	Philip Kwesi Nkrumah	-	11/02/2009	9	1
36	Sekondi-Takoradi Metropolitan Assembly	Clement Danduri	-	11/02/2009	-	-
37	Sekondi-Takoradi Metropolitan Assembly	Jacob Ntiamaoh	-	11/02/2009	-	-
38	Ellembelle District Assembly	Hou Saeed Abdul-Rahamam	-	12/02/2009	9	1
39	Ellembelle District Assembly	Philip D Baazeng	-	12/02/2009	-	-
40	Ellembelle District Assembly	Derrick Obeng	-	12/02/2009	-	-
41	Sekondi Paramount Chieftaincy	Nana Kobina Nketsia V	-	14/02/2009	2	1
42	Ahanta West District Administration	Ofori Acheanpong	-	13/02/2009	10	1
43	Ahanta West District Administration	Abduln Zakan	-	13/02/2009	-	-
44	Ahanta West District Administration	Isaac Affum	-	13/02/2009	-	-
45	Nzema East District Assembly	Joshua Kwajah-Ellimah	-	13/02/2009	10	1
46	Nzema East District Assembly	G. R. K. Dzamesi	-	13/02/2009	-	-
47	Nzema East District Assembly	Anthony Arthur	-	13/02/2009	-	-
48	Jomoro District Assembly	Evans Mark Andoh	-	16/02/2009	-	-
49	Jomoro District Assembly	R. A. Achempong	-	16/02/2009	11	1
50	Conservation Foundation	OY Owusu-Sekyere	-	13/05/2009	1	-
51	Ricerca e Cooperazione	Agbo Korshi Steven	-	16/02/2009	1	-
52	Evangelical Charity Foundation	Pastor Emmanuel Asante	-	16/02/2009	1	-
53	Friends of the Nation	Kyei Kwodwo	-	13/05/2009	1	-
54	Friends of the Nation	Donkris Mevuta	-	13/05/2009	1	1
55	WERENGO	Donkris Mevuta	-	13/05/2009	-	-
56	Ghana National Canoe Fishermens Council	John D Eshun	-	17/02/2009	1	1
57	Ghana National Canoe Fishermens Council	Nana Ackom	-	17/02/2009	1	-
58	Care International	Nanna Callisen Bang	-	18/02/2009	4	2
59	Ghana Wildlife Society	Augustus A Asamoah	-	18/02/2009	4	1
60	Wassa Association of Communities Affected by Mining (WACAM)	Daniel Owusu-Koranteng	-	18/02/2009	4	1
61	Conservation International	Yaw Osei-Owusu	-	18/02/2009	4	1
62	KASA (Natural Resouce and Environmental Governance (NREG) Programme	Allan Larsey	-	-	1	-
63	Civic Response	Kyeretwie Opoku	-	-	1	-
64	Coalition Forest Watch Ghana	Kingsley Bekoe Ansah	-	-	1	-
65	Birdlife International - Ghana	Dr Paulinus Chiambeng	-	-	1	-
66	Nature Conservation Research Council	John Maison	-	-	1	-
67	Fisheries Committee of Weste Central Gulf of Guinea (Under FOA) Nigeria, Benin	Dr Serafim Nadjie	-	-	1	-
68	National Fishermen's Association of Ghana (NAFAG)	Fl. Lt. M. G. Tackey	-	-	1	-
69	Ghana Inshore Fishermen's Association (GIFA), Tema	Nii Armah Quaye	-	-	1	-
70	Ghana National Canoe Fishermen's Council	Nii Aboe Kyerekwanda	-	-	1	-
71	Ghana Tuna Association	John Farmer	-	-	1	-
72	Ahanta Youth Leader	Michael Kwaw Nyarku	-	-	1	-
73	Interested Party	Wisdom Quaiku	-	-	1	-
74	National Association of Nzema Students	Pius Kofi Amenlemah	-	-	1	-
75	Centre for Community and Social Advancement	Ketiboa Blay	-	-	1	-
76	Kwame Nkrumah University of Science and Technology	Fafanyo Kofi Tengey	-	-	-	-
77	Diadem Foundation		-	-	1	-
78	Handmaid Economic Network		-	13/05/2009	1	-
79	Rural Aid Alliance Foundation		-	13/05/2009	1	-
80	Marine Time Life Precious Foundation		-	13/05/2009	1	-
81	C.K. Mann Foundation		-	-	1	-
82	Geobfrn		-	-	1	-
83	Care International		-	13/05/2009	1	-
84	Opportunities Industrialisation Centres International		-	-	1	-
85	Women in Law and Development in Africa Western Region		-	13/05/2009	1	-
86	Advocates & Trainers For Women's Welfare Advancement &Rights (ATWWAR)	A N de Heer	-	13/05/2009	1	-
87	Safety Consult		-	-	1	-
88	African Women International(AFWI)		-	-	1	-
89	Master Care Ministries	Lawrence Francis Eshun	-	13/05/2009	1	-
90	Berea Social Foundation		-	-	1	-
91	Trainees Occupational Safety & Health Foundation (TOSH)		-	13/05/2009	1	-
92	Human Kindness Foundation (HKF)		-	-	1	-
93	Favour Foundation	Stanley Nkeusoh	-	13/05/2009	1	-
94	Foundation For Physically Challenged, Ghana	G F Ferguson	-	13/05/2009	1	-
95	Daasgift Quality Foundation		-	13/05/2009	1	-
96	Philobed		-	-	1	-
97	Wassa Association of Communities Affected by Mining (WACAM)		-	-	1	-
98	World Vision International		-	-	1	-
99	End Time Restoration Ministry (ETRM)		-	-	1	-
100	Global Agenda Network (GLOANET)		-	-	1	-
102	Rural Environmental Care Association (RECA)		-	-	1	-
103	Support To Micro Enterprises Programme		-	-	1	-
104	Professional Musicians Association of Ghana (PROMAG)	Sarpong-Kwakwa	-	13/05/2009	1	-
105	Netherlands Development Organisation (SNV)	Piet Schermerhorn	-	13/05/2009	1	0

Appendix II

Issues Register

The issues raised by stakeholders via written correspondence, at consultation meetings or public hearing are summarised in *Table 1.1*. Full names of abbreviations used are provided at the foot of the table.

Table 1.1 *Summary of Issues Raised by Stakeholders*

Theme	#	Comments and Issues	Raised By	EIS Reference
Air Emissions	1.1	<i>Flaring</i> – Will flaring be undertaken and how will this impact on air quality?	SDA, NEDA, CFA, DG, Public Hearings	Section 3.7.1; Section 5.4
	1.2	<i>Effect of emissions to air</i> – What emissions will be generated by the project and how will it affect air quality?	AWDA	Section 5.4
	1.3	<i>Greenhouse gas emissions</i> – Concern over impacts to the atmosphere and emissions of greenhouse gasses as a result of the project.	AWDA	Section 5.4.2
	1.4	<i>Atmospheric impact</i> – What is the seasonal wind direction? What measurements have or will be done? What pollutants may flow or be blown on-shore?	CESCA	Section 4.2.1; Section 5.4
Benefits and Revenues	2.1	<i>Benefits to districts</i> – How will this district benefit from the project?	EDA, SDA, NEDA, CF	Section 1.2.4; Section 5.7
	2.2	<i>Royalties</i> – Will royalties be paid to affected communities as happens with mining?	EDA, CF, Public Hearings	Section 1.2.4; Section 5.7.4
	2.3	<i>Distribution of revenue from oil taxes</i> – Government of Ghana should manage revenue from oil taxes responsibly and distribute the benefits fairly.	PCS, FoN	Section 5.7.4
	2.4	<i>Transparency about revenue from oil taxes</i> – The government should be transparent about the revenues from oil production. Will Tullow be willing to be part of Publish What You Pay?	PCS, FoN	Section 5.7.4
	2.5	<i>Job creation</i> – How many jobs will be created by the project?	SDA, EDA, STMA, CFA	Section 5.7.5
	2.6	<i>Local content</i> – Concern was raised over the number of Ghanaians who will be employed by Tullow and on the FPSO.	CF, ATWAAR, Public Hearings	Section 3.6; Section 5.7.5
	2.7	<i>Assembly Common Funds</i> – Chief Fishermen should be involved in the handling of Assembly Common funds and other funds that may accrue to their area as a result of oil.	CF	Noted
	2.8	<i>Employment equity</i> – Will Tullow give consideration to gender balance and will Tullow have procedure to ensure employment equity?	WILDAF, FFC	Section 5.7.5

Theme	#	Comments and Issues	Raised By	EIS Reference
	2.9	<i>Education and Employment Opportunities</i> - Education programmes are required for local people, particularly young people, to ensure that they have access to job opportunities. Explore possibility of establishing education institute and encourage institutes to develop courses for young people orientated to the oil and gas industry.	Public Hearings	Section 5.7.5
	2.10	<i>Emergency services</i> - Project activities will rely on Ghana emergency services such as police, navy and fire services. Tullow should support these to ensure that required equipment and resources are in place.	Public Hearings	Noted
	2.11	<i>Employment Offices</i> - Tullow staffed employment offices in the districts required so that local people are aware of opportunities and can apply for jobs. Work with District Assemblies for employment planning for young people.	Public Hearings	Section 5.7.5; Annex A
	2.12	<i>Procurement</i> - Ensure local businesses are educated on the supply chain process and are given the opportunity to bid for contracts.	Public Hearings	Section 5.7.6
Biodiversity	3.1	<i>Invasive species</i> - Concerned about the introduction of alien species through the discharge of ballast water in Ghanaian waters.	DF, GMA, GWS, CF, FoN	Section 5.3.9
	3.2	<i>Marine biodiversity</i> - Concerns regarding impacts on marine turtles, mammals and birds.	AWDA, GWS, CI, Public Hearings	Section 5.2 Section 5.6
	3.3	<i>Effects on integrity of coastal environment</i> - How will the project affect the integrity of the coastal environment?	AWDA, GWS	Chapter 5 Various sections
	3.4	<i>Effects on biodiversity due to onshore waste disposal</i> - Concern about the impact of onshore waste disposal on biological communities.	CI	Section 5.5
	3.5	<i>Produced Water Discharge</i> - treatment and management of produced water and impacts on marine environment	Public Hearings	Section 3.8.3 Section 5.3.5
Consultation Process	4.1	<i>Manage expectations</i> - Communities have high expectations of oil developments and often misconceptions about potential impacts and benefits. There is a need for Tullow to manage people's misconceptions about the project and expectations.	EPA, EDA, AWDA, PCS, WERENGO, DoF, SDA, JDA	Section 5.7; Chapter 9
	4.2	<i>Public hearings</i> - Will there be public hearings as part of the EIA? Where will the hearings be held?	STMA, FoN, EPA	Section 1.5.9
	4.3	<i>Spatial scope of consultation</i> - The project boundaries should be defined to determine who should be consulted.	PCS	Annex A
	4.4	<i>Consultation with NGOs</i> - Concern about the timing of contacting NGOs in EIA process. NGOs can facilitate the dissemination of information to the public and communities trust NGOs and defer to them for advice.	WERENGO, WACAM, JDA	Annex A

Theme	#	Comments and Issues	Raised By	EIS Reference
	4.5	<i>Translation</i> – EIA documents should be translated to local languages for consumption of the public.	AWDA	Annex A
	4.6	<i>Consultation with civil society</i> – Tullow needs to consult directly with civil society.	WERENGO, FoN, WACAM, Public Hearings	Annex A
	4.7	<i>Consultation with traditional leadership</i> – chiefs and traditional leaders should be consulted.	Public Hearings	Annex A
	4.7	<i>Consultation with Fishermen</i> – How is Tullow planning to consult with fishermen and coastal communities to obtain comments and concerns?	SDA, Public Hearings	Section 5.7.7 Annex A
	4.8	<i>Ongoing Stakeholder Engagement</i> - CARE recommended a more structured engagement between Tullow and civil society in the Western Region, which would narrow the gap in information sharing	CARE Public Hearings	Annex A; Section 9.4.3 Section 9.7
	4.9	<i>Complaints</i> - mechanism, for dealing with complaints and grievances required eg oversight committee	Public Hearings	Section 5.7.7 Section 9.8
Education and Corporate Social Responsibility	5.1	<i>Allocation of CSR benefits</i> – Some communities are closer to the project than others. Will some districts benefit more from the CSR programme?	EDA, SDA, Public Hearings	Section 2.8.2; Section 5.7.4
	5.2	<i>Education and Skills Development</i> – Need for Tullow to support educational needs and train people to work in the oil industry.	EDA, AWDA, NEDA, Public Hearings	Section 5.7.5; Chapter 9
	5.3	<i>Enterprise development</i> – How will Tullow assist with enterprise development?	EDA, SDA, Public Hearings	Section 5.7.6; Annex A
	5.4	<i>Education about oil industry</i> – Need to engage and educate people regarding expectations and avoid influx of people to coastal districts in search of jobs or to claim that oil is on their land.	STMA, AWDA, NEDA, PCS, WERENGO, JDA, DQF, Public Hearings	Section 5.7.4
	5.5	<i>Interaction and training</i> - Need for continuing interaction with District Assemblies and training on how to communicate information to communities.	STMA, SDA, EDA, AWDA, PCS, JDA, Public Hearings	Section 5.7; Annex A
	5.6	<i>Involvement in CSR</i> – Chief Fishermen requested that fishermen groups be involved in Tullow’s CSR initiative.	CF, Public Hearings	Section 2.8.2; Section 5.7.7
	5.7	<i>CSR and tourism</i> – Explain ways and opportunities for effective collaborations between Tullow CSR and NGOs for developing the tourism industry in the region.	SNV	Section 2.8.2
	5.8	<i>Needs assessment</i> – Has Tullow undertaken a needs assessment in promoting its community development programs and projects?	DQF	Annex A Section 2.3 Section 2.8.2

Theme	#	Comments and Issues	Raised By	EIS Reference
	5.9	<i>Women economic empowerment</i> - Will Tullow CSR include plans/program for women economic empowerment?	DQF	Annex A Section 2.3
	5.10	<i>Physically challenged</i> - Will Tullow's CSR program include the physically challenged and what Tullow is doing for them?	FPC Public Hearings	Annex A Section 2.3
	5.11	<i>CSR linking with Development Plans</i> : Need to ensure that communities are consulted and any CSR programmes are linked to District Development Plans.	Public Hearings	Annex A
	5.12	<i>Alternative Livelihoods</i> - A programme of developing alternative livelihoods for those who will be affected by the project is required, particularly in the event of people being excluded from project areas (i.e. safety zones) and accidents such as an oil spill affecting fishermen and related businesses.	Public Hearings	Section 5.7.7 Annex A
	5.13	<i>Trust Funds</i> - Establish district trust funds under the District Assemblies for local community development and for education. Funds required for Traditional Leaders to communicate project information to their people.	Public Hearings	Annex A
	5.14	<i>Consultation and Communication</i> - Need to develop a system to manage high expectations of the communities. Information centres required in key locations.	Public Hearings	Annex A
	5.15	<i>Transparency</i> - Transparency in all of TGLs operations e.g., CSR, employment and revenues.	Public Hearings	Annex A
	5.16	<i>Oversight and Grievance Procedure</i> - EPA to ensure that the project is monitored and evaluated to protect the environment. Establish local oversight committees with representatives of local groups to address issues, grievances and complaints. TGL and the Government of Ghana and Civil Society Organisations to work together on conflict resolution and environmental protection.	Public Hearings	Annex A; Section 9.4.3 Section 9.5.4 Section 9.5.6
EIA methodology and Scope	6.1	<i>Scope of the EIA</i> - The scope of the EIA needs to be clearly defined with respect to the well drilling and piping of gas to shore.	EPA	Section 1.5.3 and 1.6
	6.2	<i>Cumulative impacts</i> - Cumulative impacts should be discussed and addressed in the EIA for all consented and foreseeable projects.	DoF	Section 5.8
	6.3	<i>Fisheries</i> - The EIA should include sufficient baseline data on fisheries in the area.	DoF	Section 4.3
	6.4	<i>Mitigation and management plans</i> - A framework Environmental Management Plan should be compiled as part of the EIA.	SDA	Chapter 9
	6.5	<i>Social aspects</i> - The scope of the ESIA should include social aspects.	CESCA, FoN	Section 4.4; Section 5.7
	6.6	Cultural Resources: impacts on cultural and archaeological resources should be assessed	Public Hearings	Section 5.2.1

Theme	#	Comments and Issues	Raised By	EIS Reference
Fisheries	7.1	<i>Alternative livelihoods</i> – Fish stocks have dwindled over recent years and Tullow could consider supporting alternative livelihoods for fishermen who are excluded from traditional fishing grounds in the Jubilee area.	DoF, EDA, NEDA, CFA, FD Public Hearings	Section 3.1 Section 5.7.7
	7.2	<i>Support to Fisheries</i> – Tullow should investigate projects to support the fishing industry as part of their CSR.	FD, Public Hearings	Section 5.7.7
	7.3	<i>Fisheries committee</i> - It was suggested that a fisheries committee be established that could engage with Tullow regarding fisheries issues.	DoF	Section 5.7.7
	7.4	<i>Effects on fisheries due to loss-of-access to fishing grounds</i> - Fish are normally attracted to offshore structures. Exclusion of fishing boats from this zone could result in conflict between oil and gas and fisheries sectors. Concern was raised about the effect on fishermen due to exclusion from fishing grounds.	DoF, EDA, NEDA, PCS, FD, JDA, CF, Public Hearings	Section 5.7.7
	7.5	<i>Effects on fish and spawning grounds</i> – Need to consider effects of the FPSO and oil spills on fish spawning grounds.	NEDA, DoF, JDA	Section 5.6
	7.6	<i>Fisheries Impact Assessment</i> – A fisheries Impact Assessment as described in the Fisheries Act (Act No. 625 of 2002) is required if a project was likely to have a significant impact on the fisheries resource.	EPA, FD	Section 5.7.7
	7.7	<i>Effects on fishing resources</i> – Concern over the impact of the development on fishing resources and fish ecology.	AWDA, PCS	Section 5.2, 5.3, 5.6 and 5.7
	7.8	<i>Damage of nets by supply vessels</i> – Fishermen are concerned about nets that get damaged by supply vessels.	CFA, GMA, CF	Section 5.7.7
	7.9	<i>Effects of light and flaring on fish</i> – How will flaring affect fish ecology?	DoF, Public Hearings	Section 5.2
	7.10	<i>Safety of Fishermen</i> - Need adequate warning signals near FPSO and other production facilities to signal buffer zone to fishers in the area.	CF, Public Hearings	Section 5.7.7
Navigation	8.1	<i>Working anchorage</i> - Tullow should consider establishing a working anchorage off Takoradi for supply vessels.	GMA	Noted
	8.2	<i>Shipping routes</i> - Commercial shipping traffic routes are located closer to the shore and away from the Jubilee field. The offshore facilities and safety zone should nevertheless be charted.	GMA, GPHA	Section 5.7.8
Oil Spill	9.1	<i>Insurance and Liability</i> - The IOPC is only applicable to moving vessels. There is concern that the FPSO does not qualify for compensation to Ghana's administration in the case of an oil spill. The Government of Ghana therefore requires minimum US\$ 1 billion insurance cover per occurrence for oil spill.	GMA Public Hearings	Section 5.6.7

Theme	#	Comments and Issues	Raised By	EIS Reference
	9.2	<i>Effects of oil spill on natural resources</i> – Need to consider the effects of oil spills on natural resources, including fish.	NEDA, DoF	Section 5.6
	9.3	<i>Oil Spill Contingency Planning</i> – How will Tullow prevent and manage oil spills?	NEDA, SDA, Public Hearings	Section 5.6.7, Chapter 6; Chapter 9
	9.4	<i>Effects of oil spill on coastal communities and fishermen</i> – Need to consider risks of oil spills to coastal communities, fishermen, especially areas closest such as Cape Three Points.	NEDA	Section 5.6.6
	9.5	<i>OSCP Disclosure</i> - Though that would come into the ESMP, even at this stage some level of concept explanation should be done to the district assemblies about the company's plan for possible oil spill.	CESCA	Section 5.6.7
	9.6	<i>Emergency Response</i> - Ensure effective links are made with all the security agencies within the project Emergency Response Plan. Improve health facilities to deal with casualties in the event of accidents.	Public Hearings	Section 5.6.7
	9.7	<i>Oil Spills</i> - Develop OSCP and compensation process for affected persons and communities.	Public Hearings	Section 5.6.7; Annex A
Planning and Onshore infrastructure	10.1	<i>Effects on road and housing infrastructure</i> – Concerns about the impact of the growing oil industry and associated service companies on infrastructure eg roads in the district that were not designed to accommodate large trucks.	STMA, EDA, AWDA, Public Hearings	Section 5.7.9
	10.2	<i>Water demand</i> – Would the operations require potable water and is there capacity to supply this water?	EDA	Section 3.5.2 Section 5.7.9
	10.3	<i>Development and Spatial Planning</i> – Concern about influx of people and lack of infrastructure to deal with it. Requests for support from Tullow with development of development plans.	AWDA, EDA, STMA, SDA Public Hearings	Section 5.7.9 and 5.8; Section 9.3.5
	10.4	<i>Port capacity</i> - GPHA reported that currently they do not have constraints to handle operations of supply vessels even during peak seasons. A master plan was being compiled for Takoradi port that takes into account future oil operations. The Port is currently underutilised and should be used.	GPHA, PCS	Section 3.5.9
	10.5	<i>Takoradi airport</i> – Is Tullow planning to upgrade Takoradi airport?	EPA	Section 3.5.9
	10.6	<i>Affects on agriculture</i> – there was concern about the possible affects of the project on agriculture	Public Hearings	Section 5.7.9
Project Details	11.1	<i>FPSO design</i> – The EIA should include a site specific risk assessment for the FPSO to consider single vs double hull options.	GMA, Public Hearings	Section 3.3.3
	11.2	<i>Timelines</i> – When is first oil expected and for how long will the field be operational?	STMA	Section 3.2.2

Theme	#	Comments and Issues	Raised By	EIS Reference
	11.3	<i>Onshore infrastructure</i> – Will a refinery be developed as part of the project? Will a gas generation plant be developed as part of the project?	SDA, NEDA, JDA	Section 1.6
	11.4	<i>Safety zone</i> – How will the safety zone be implemented and enforced? The size of the safety zone should be determined based on vessel length and layout of subsea infrastructure.	DoF, GMA, Public Hearings	Section 3.4.4 Section 5.7.7
	11.5	<i>Feasibility of project</i> – Will the project still be viable given the decreasing oil price.	JDA	Noted
	11.6	<i>Maritime standards</i> - Tullow should liaise with GMA regarding local maritime standards and FPSO design requirements.	GMA	Chapter 2
	11.7	<i>Project Cost and Scale of Development</i> - Enquired about the costs of the oil field development, estimated cost of production, size of the oil field and volumes that would be produced after development.	ATWWAR	Section 3.2
	11.8	<i>Exclusion Zone</i> – The concept of the exclusion zone should be communicated to stakeholders including district assemblies, coastal traditional rulers, selected opinion leaders and fishermen in general, but more particularly those based on-shore in the project area.	CESCA, Public Hearings	Section 3.4.4
	11.9	<i>Decommissioning</i> – A decommissioning plan should be prepared and implemented.	Public Hearings	Section 3.5.10; Chapter 8
Security	12.1	<i>Security clearance</i> - Tullow should apply for a security clearance from the national security officer to enable them to seek naval assistance.	GMA	Section 3.4.4
	12.2	<i>Cote d'Ivoire Border</i> – The Cote d'Ivoire and border and Economic Exclusion Zone need to be clearly defined as the Jubilee field is located near the border and could be disputed if more oil was found.	DoF	Noted
	12.3	<i>Security during offloading</i> – Concern over security during offloading of oil to shuttle tankers.	PCS, CFA, FD	Noted
	12.4	<i>Population influx</i> - Security resulting from influx? (a) Project security? (b) Coastal security?	CESCA, Public Hearings	Section 5.7.5
Socio-economic and Health	13.1	<i>Population influx</i> – Concern over people immigrating to coastal districts as a result of expectations to benefit from the oil development and speculative buying of land and property adjacent to the port in anticipation of perceived future oil developments in the area.	GPHA, AWDA, STMA, SDA, EDA, Public Hearings	Section 5.7.9
	13.2	Will there be shore based activities and population influxes to Takoradi, Jomoro or Ellembele?	CESCA, Public Hearings	Section 5.7.9
	13.3	<i>Effects on coastal communities</i> – What are the effects of emissions on coastal communities?	EDA, CFA, SDA	Section 5.4
	13.4	<i>Health effects</i> – How will the project impact on health of coastal communities?	AWDA, Public Hearings	Section 5.7.9

Theme	#	Comments and Issues	Raised By	EIS Reference
	13.5	<i>Occupational health</i> – Concern about the health and safety of unskilled workers employed by Tullow.	CF, Public Hearings	Section 2.3.9; Chapter 9
	13.6	<i>Social Impact Assessment</i> - The importance of social impacts as a component of the EIA was highlighted and that mitigation measures should be more focused after the social impact assessment.	WERENGO	Chapter 5; Chapter 6
	13.7	<i>Cultural heritage</i> – concern was expressed about the potential impacts on marine archaeology and cultural heritage along the coast such as the forts.	Public Hearings	Section 5.2.1
Waste Management	14.1	<i>Waste standards</i> – Waste management has to be right for Ghana by adoption and adaption of best practice.	STMA	Section 5.5; Section 5.8
	14.2	<i>Waste management capacity</i> – Sekondi-Takoradi does not have sufficient waste management capacity. How is Tullow planning to manage their waste and how can there be in-country benefit eg new waste management plant?	GPHA, STMA, CI, NEDA, DQF, Public Hearings	Section 5.5
	14.3	<i>Oil reception facilities</i> - An oil reception facility, where waste oil is collected and recycled, is available at the port.	GPHA	Section 5.5
	14.4	Waste Disposal - provide more details on where wastes will be disposed of.	Public Hearings	Section 3.8 Section 5.5 Annex F

Comments were raised by the following Bodies.

- Advocates and Trainers for Women’s Welfare, Advancement and Rights (ATWAAR)
- Awanta West District Assembly (AWDA)
- Canoe Fishermen’s Association (CFA)
- CARE International (CARE)
- Centre for Social and Community Advancement (CESCA)
- Chief Fishermen (CF)
- Conservation International (CI)
- Daasgift Quality Foundation (DQF)
- Daily Guide (DG)
- Directorate of Fisheries (DoF)
- Ellembelle District Assembly (EDA)
- Environmental Protection Agency (EPA)
- Fisheries Department (FD)
- Foundation for the Physically Challenged (FPC)
- Friends of the Nation (FoN)
- Ghana Maritime Authority (GMA)
- Ghana Ports and Harbours Authority (GPHA)
- Ghana Wildlife Society (GWS)
- Jomoro District Assembly (JDA)
- Nzema East District Assembly (NEDA)
- Paramount Chief Sekondi (PCS)
- Public Hearings
- Sekondi-Takoradi Metropolitan Assembly (STMA)
- Shama District Assembly (SDA)
- SNV Netherlands Development Organisation (SNV)
- Wassa Association of Communities Affected by Mining (WACAM)
- Western Region Network of NGOs (WERENGO)
- Women in Law & Development in Africa (WILDAF)

Appendix III

Jubilee Field Phase 1
Development:

Background Information
Document

Background Information Document and Invitation to Comment



The Phase 1 Jubilee Field Development

The Jubilee Field was discovered offshore Ghana in 2007. It is an underground oil and gas reserve which is located in approximately 1,100 m of water within the Deepwater Tano and West Cape Three Points concession blocks (Figure 1). The Jubilee Unit Area is operated by Tullow Ghana Limited (Tullow).

Tullow have completed the exploration of the Jubilee Field and now wish to develop it to produce oil. There may be further phases of exploration and development and it is estimated that the field could have a 20 to 30 year lifespan.

The aim of this document is to provide background information about the project and the EIA process and to invite comment on any issues or concerns you may have.



Figure 1: Map showing the Jubilee Field



Figure 2: Floating Production Storage Offloading vessel

Environmental Impact Assessment (EIA)

Under the Ghana Environmental Assessment Regulations of 1999 (LI 1652) an EIA is required to be submitted by the applicant in support of oil production projects.

Tullow has commissioned Environmental Resources Management, UK (ERM) in collaboration with ESL Consulting, Ghana (ESL) to undertake the EIA for the Phase 1 Jubilee Field development. The EIA will describe the project, assess the likely positive and negative impacts of the project and describe the plans to be put in place to manage these impacts.

The EIA, along with comments received from stakeholders will be submitted to the Environmental Protection Agency (EPA) who will decide whether or not to authorise the proposed project.

The Phase 1 Development Project

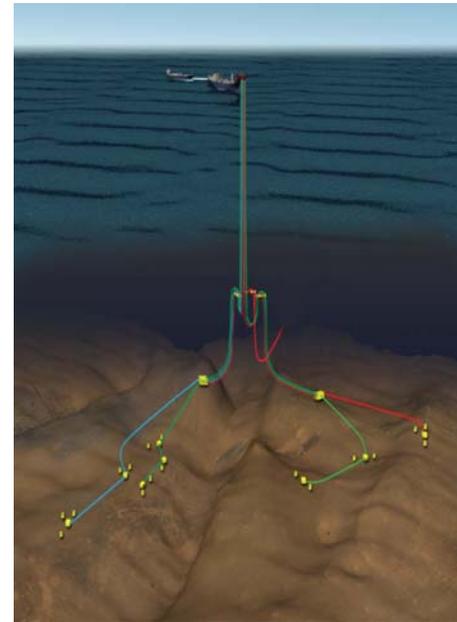


Figure 3 Subsea well and pipeline layout

Emergency Response Plan

An Emergency Response Plan will be developed to protect life, the environment and property in the event of an emergency. The plan will cover medical evacuation, search and rescue, and fire prevention and protection. There will also be an oil spill response plan with actions to prevent spills and plans, resources and procedures for responding in the event of a spill.



Figure 4 Onboard emergency response team

Field Development and Production

Following discovery of the oil field the Tullow engineering team have been working on the design of oil production operations and facilities to bring the oil to the surface. The development of the field requires drilling a series of production wells and the installation of processing facilities. The Phase 1 project will develop primarily the west side of the field and comprises a series of nine production, three gas injection and five water injection wells (Figure 3). Information on the size and nature of the oil and gas reserves obtained during Phase 1 will inform any future development phases.

Production Facility

Oil from the Jubilee Field will be produced through a customised ship, called a Floating Production, Storage and Offloading (FPSO) vessel (Figure 2). The FPSO will be permanently moored in the Jubilee field at approximately 1,000 water depth. Oil from the wells will be transferred to the FPSO through a number of flexible pipes attached to wellheads on the seabed.

Offloading System

The oil from the wells will be processed on the FPSO and the crude oil will be stored on board. Shuttle tankers will offload the oil directly from the FPSO and will take the oil to refineries across the world where petrol, jet fuel and other products are made (Figure 6). Some gas will also be produced from the wells and this will be used for power generation on the FPSO and the rest will be injected back into the wells to maintain well pressure.

Exclusion Zone

As required for all offshore installations there will be a safety exclusion zone around the FPSO with no access to unauthorised vessels. To account for tanker loading operations it is likely that this will cover an area within a 1,000 m of the FPSO.

Support Operations

The FPSO production facilities would require daily visits from a support vessel to bring supplies and tugs would also be required to help in the weekly tanker offloading operations. Twice daily helicopter support will also be required for crew transfers. The onshore support base is proposed to be at the existing port and heliport facilities at Takoradi (Figure 5).

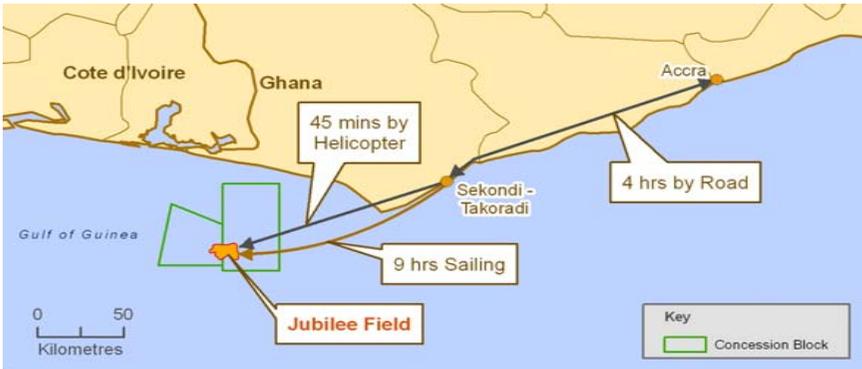
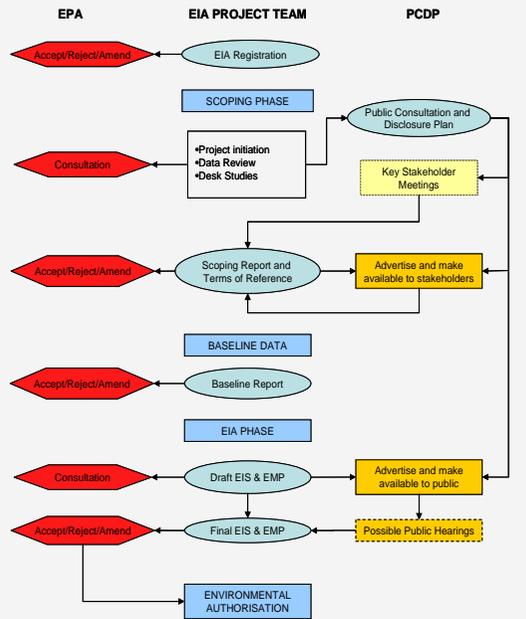


Figure 5 Jubilee support transit routes

The EIA Process

The EIA process has the following main steps:

- Registration EIA with the EPA
- Initial scoping consultation with key stakeholders
- Compile and submit Scoping Report to EPA
- Advertise and make Scoping Report available to stakeholders for comment
- Stakeholder consultation meetings to discuss proposals and obtain comment.
- Collate baseline information
- Compile draft EIA report and Environmental Management Plan (EMP)
- Advertise and make draft EIA report available to stakeholders
- EPA may call for public hearings
- Compile final EIA report and EMP and submit to EPA for decision-making



Key Issues Identified to Date

The following key issues were identified during the Scoping study:

Impacts to Water

- Disposal of excess water from the wells into the sea (produced water).
- Discharges (cooling water, ballast water, sewage and deck drainage) to the sea and impacts on water quality.

Impacts to Atmosphere

- Exhaust emissions from support vessels and helicopters.
- Exhaust emissions from power generation from gas turbines on the FPSO.
- Emissions from gas flaring during FPSO maintenance shutdowns and from process vents.

Waste Management

- Disposal of solid waste from FPSO and support vessels.
- Use and disposal of process chemicals.

Biodiversity

- Seabed 'footprint' of subsea infrastructure resulting in seabed disturbance and impacts on benthic communities.
- Disturbance from vessel movements, helicopter operations, noise and light to sea mammals, turtles and fish.

Socio-economics

- Tax revenues payable to the government and effects on the development of the country.
- Creation of direct and indirect employment opportunities.
- Influx of people seeking employment and business opportunity.
- Exclusion of commercial and recreational vessels and fishermen from safety zone around the FPSO and tankers.
- Potential impacts on fish resources due to presence of structures and vessel and discharges and secondary impacts on commercial fisheries.
- Potential damage to fishing nets and increased risk of shipping collisions along supply vessel transit routes.
- Effects of increased use of supply base and heliport on existing users and residents.

Accidental Events

Accidental events could include oil spills and fires which could have impacts to:

- marine and coastal resources and associated socio-economic effects, and
- transboundary effects (eg Cote d'Ivoire).

Cumulative Impacts

The EIA will consider cumulative impacts of existing projects, the proposed project and planned future projects.



Figure 6: Shuttle Tanker Operations

Appendix IV

Jubilee Field Phase 1 Development:

EIA Tools and Outputs

- Meeting Minutes
- Attendance Registers
- Photos

Meeting minutes

Subject/Ref Tullow Phase 1 Jubilee Field Development EIA

Venue Tullow Offices, Accra, Ghana

Date of Meeting Tuesday 3 February 2008

Present Nick Flanders (NF) (IFC), Paulo Lombardo (PL) (IFC), Rex Quick (RQ) (Tullow), Okyeame Ampadu-Agyei (OA) (Tullow), Mark Irvine (MSI) (ERM), Albert de Jong (AdJ) (ERM)

Distribution To attendees via email

Date 4 February 2009

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NOTES

NF and PL introduced themselves and indicated that an Environmental and Social Report Summary (ESRS) had been released in advance of the IFC Board of Directors' consideration of the proposed project. An Environmental and Social Action Plan (ESAP) was prepared as part of the documentation and could be downloaded from www.ifc.org/disclosure.

NF needs to present this documentation to the board on 19 February. The EASP contains some actions to be addressed in the EIA while others are longer term actions which Tullow needed to take onboard. The IFC requested that the following key actions be addressed in the EIA:

- Drilling cuttings and mud dispersion modelling;
- Single vs double hull risk assessment;
- Produced water dispersion modelling;
- Environmental Baseline Survey; and
- Oil spill modelling; and

Tullow had confirmed that these actions would be undertaken. RQ would develop Terms of Reference for these studies.

In addition, other issues that Tullow believed need to be addressed are flaring and waste management.

The EPA requested that the socio-economic section of the EIA be strengthened and more emphasis be placed on the social component in the EIA report

Drilling cuttings and mud dispersion modelling

It was agreed that drilling is not included in the scope of the Tullow EIA, however, the IFC had requested that drill cutting dispersion modelling be undertaken and that the EIA considered alternatives for the disposal of drill cuttings (see section on waste below). It was decided that the drill cuttings report not be included in the EIA to avoid confusion. It would be attached as an annex to the relevant lender document (ESER). Sufficient, relevant hydrographic data will be required. RQ would obtain relevant hydrographic data sets.

ACTION

RQ

Meeting minutes

Single vs double hull risk assessment

PL said that the EIA must include an alternatives analysis and should consider single vs double hull of the FPSO as one of the alternatives. This would require a site specific risk assessment, taking into account weather, location, shipping traffic etc. The risk assessment could also consider design alternative eg having a double hull in certain sections.

Produced water dispersion modelling

PL requested that produced water dispersion modelling be undertaken as part of the EIA. Simple one dimensional modelling software such as Cormix can be used for this. The engineering team would have to confirm the viability of re-injecting produced water. RQ would confirm with management how to establish communications link with the engineering team to set up telephone conference the following week.

Environmental Baseline Survey

The IFC would like to review the EBS report when available as this is regarded as an important component of the EIA. RQ received the report the day before and will provide a copy to the IFC. The biodiversity baseline will have to be strengthened if the EBS report did not address this in sufficient detail. It should be confirmed if the project area is a critical habitat for any sensitive species such as blue whales, turtles and/or birds as required by the IFC Performance Standards. The baseline should also consider migration corridors of sensitive species.

Oil spill modelling

ERM would be able to address this action but sufficient, relevant metocean data will be required. RQ will obtain available metocean data from past exploration activities.

Waste Management Plan

Tullow believed that waste management was an issue that needed to be addressed, in particular the discharge of pressure testing water and disposal of drill cuttings. Tullow would develop a waste management plan in parallel with the EIA.

Scope of the EIA

The scope of the EIA needed to be clearly defined. It was agreed that drilling was not included although the drill cutting dispersion and waste management studies would be undertaken in parallel with the EIA. The project description excluded export of gas to shore. Gas would be re-injected and some used for power generation on the FPSO.

Fisheries

Fish are normally attracted to offshore structures. Exclusion of fishing boats from this zone, is a potential issue for conflict between the oil and gas and fisheries sectors. NF requested that the EIA addressed these issues and identified mitigation (eg the use of Fish Attracting Devices - FADs). It was decided that additional baseline data on fisheries in the project area would be required for the EIA. It was also suggested that Tullow investigate projects to support the fishing industry as part of their CSR programme.

RQ

RQ

Meeting
minutes

Consultations

MSI needed clarification on the IFC's expectations of EIA consultations for this project. He indicated that ERM had compiled a draft PCDP. The PCDP provided for consultation with national, regional and local stakeholders but no meetings were planned with specific communities. A hierarchical approach would be followed with consultations with district assemblies and fishing associations/representatives at the local level. NF confirmed that the project was classified as a category B project and that the extent of impact should determine the level of consultations. The project boundaries need to be defined to determine who should be consulted. IFC performance standards require free and prior informed consultation with impacted communities only. Broad based community support is not required as part of the EIA but could be implemented with Tullow's CSR programme.

Cumulative impacts

MSI indicated that cumulative impacts would be discussed and addressed in the EIA. ERM normally considered consented projects as part of the cumulative effect assessment. NF indicated that this is in line with IFC's PS1 which states that cumulative impacts of foreseeable projects must be considered.

Environmental Management Plan (EMP)

A framework EMP will be compiled as part of the EIA. The EMP will consist of a set of management, mitigation and monitoring measures to be undertaken during installation, operation and decommissioning of the project. The EMP would include responsibilities, timings, monitoring measures and audit review programme but no costs would be provided. Detailed management plans would be produced by Tullow and reported to the IFC.

Timing

All ESAP actions were to be completed by August 2009. The waste management plan and cuttings modelling report need not be linked with the EIA schedule and can be undertaken as separate studies. Other EIA specific actions such as produced water, oil spill modelling etc would need to tie in with the EIA schedule.

Meeting minutes

Subject/Ref Tullow Phase 1 Jubilee Field Development EIA

Venue EPA Offices, Accra, Ghana

Date of Meeting Tuesday 3 February 2008

Present EPA: Nana Andoh (NA), Ebenezer Sampong (ES), Kojo Agbenor-Efunam (KA)

Distribution Rex Quick (RQ) (Tullow), Mark Irvine (MSI) (ERM), AK Armah (AK) (ESL), Albert de Jong (AdJ) (ERM)
To attendees via email

Date 4 February 2009

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NOTES

The Scoping Report was submitted to the EPA on 17 December 2008. EPA had reviewed the Scoping Report and comments had been compiled. The comments letter needed to be signed and issued the following day.

EPA advised that copies of the Scoping Report should be made available at EPA's head office, EPA Takoradi regional office and the Ministry of Energy. A number of minor mistakes (eg page numbering) in the Scoping Report had been noticed and ERM was correcting these mistakes.

Post meeting note. The signed letter was collected on 5 February and three copies of the Scoping Report were deposited in the EPA Library.

Tullow stated that it was important to maintain regular communication between them and the EPA. Tullow would be happy to receive any further comments from the EPA.

MSI gave an overview of the EIA process to date and planned consultation activities. He said that the EIA team was planning to proceed to the next level of consultations at regional, district and local level. These consultations would be undertaken during the weeks of 9 and 17 February. The EIA team feedback from the EPA on the planned consultation process and activities.

Consultations during Scoping

ES indicated that a concern was the lack of extensive consultations during Scoping. He said that the EPA expected the Scoping Report to capture concerns and issues raised by stakeholders during scoping consultations. The Scoping Report also did not outline issues and concerns that were raised during initial consultations. ES added that although this was viewed as a shortcoming, it could be rectified during the remainder of the EIA. MSI confirmed that further consultations are planned and comments from stakeholders would be captured in the EIA report in the form of a comments-response table as an annex to the EIA report.

ACTION

EIA Team

Meeting minutes

Tullow's long term communications strategy

MSI explained that two levels of consultation could be recognised, namely long term corporate communication and 2) EIA specific consultation with affected parties. The EIA specific consultations would be aligned with Tullow's overall corporate communications strategy.

NA said that the EPA was generally concerned that proponents did not follow their EIA commitments and it would be important that Tullow assured the EPA that long term communications would take place.

RQ replied that Tullow was committed to developing and implementing their CSR programme.

Extent of consultations

MSI explained that the EIA team would aim to consult with potentially affected parties at a local level through district assemblies and fishing associations.

ES said that communities had high expectations of the oil developments and the EIA should aim to address these expectations. Evidence of consultations will be required for examples signed copies of minutes, film/record meetings. Public meetings should be held in the western region.

MSI raised the issue that it would not be possible to address all the wider community concerns regarding oil industry development in Ghana during an EIA for one project, but addressing longer terms issues would be dealt with in Tullow's CSR programme.

It was concluded that the EIA team would review the EPA's comments on the Scoping Report and if required a subsequent meeting would be held to discuss any outstanding issues.

EIA Team

Meeting minutes

Subject/Ref Tullow Phase 1 Jubilee Field Development EIA

Venue GPHA, Tema, Ghana

Date of Meeting Thursday 5 February 2008

Present Harry Barnes-Dabban (HBD) (GPHA - Estate and Environmental Manager), Richard Deih (RD), (GPHA - General Manager Estate), Rex Quick (RQ) (Tullow), Mark Irvine (MSI) (ERM), AK Armah (AK) (ESL), Albert de Jong (AdJ) (ERM)

Distribution To attendees via email

Date 5 February 2009

NOTES

The Ghana Ports and Harbours Authority operates under the Ministry of Transport.

The EIA team introduced themselves and thanked HBD and RD for meeting with them. MSI said that the aim of the EIA team was to meet with key stakeholders to present the Scoping Report and that they would also consult with stakeholders in Takoradi the following week.

Copies of the Scoping Report and Background Information Document were handed to HBD and RD for review and comment.

Takoradi Port Contacts

Contact details for key people at Takoradi port were provided by HDB:

- Executive Director - Mr Galley
- Environmental Manager - Hyde Cooper (tel. 020 8111 453)
- Harbour Master - Captain Adjabeng (tel. 020 201 2416)

Harbour Master Plan

A master plan was being drafted for Takoradi harbour which would be finalised towards the end of that year.

MSI suggested that the GNPC may be able to contribute to the review process for the development of the master plan as they would have a good overall view of the oil industry's requirements into the future in terms of storage, laydown areas and waste facilities.

Shipping Traffic

Information on shipping channels could be obtained from the officials at the port. Most shipping traffic is likely to pass through territorial waters, within 12 miles of the coast.

Waste Management

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ACTION

Meeting minutes

MSI said that waste management is an issue that the oil industry must address collectively. This issue cannot be fully addressed in the EIA but Tullow was developing a waste disposal strategy for the company and management plans for the project.

HBD confirmed that an oil reception facility, where waste oil is collected and recycled, was available at the port.

Additional issues

Additional concern that were raised included the following issues:

- people immigrating to Takoradi as a result of expectations to benefit from the oil development; and
- speculative buying of land and property adjacent to the port in anticipation of perceived future oil developments in the area.

Fishing vessels

HBH commented that fishing vessels only use Sekondi port and some Ghanaian fishing vessels landed their fish at Abidjan as this allowed them to earn foreign currency.

Meeting minutes

Subject/Ref Tullow Phase 1 Jubilee Field Development EIA

Venue Directorate of Fisheries, Accra, Ghana

Date of Meeting Friday 6 February 2008

Present DoF: Alfred Tetebo (AT) (Executive Director), Michael Cornelius (MC), Setor Avoke (SA), Lionel Awity (LA), George Hutchful (GH)

Mark Irvine (MSI) (ERM), AK Armah (AK) (ESL), Albert de Jong (Adj) (ERM)

Distribution To attendees via email

Date 6 February 2009

NOTES

AK introduced the EIA team and thanked everyone for attending.

MSI said that the Scoping Report was submitted to the EPA in December and they had finished reviewing it. The EPA had advised that the process could proceed to EIA phase. Two copies of the Scoping Report and Background Information Document were given to AT for review and comment.

MSI explained that although the meeting was part of the EIA consultation process, the consultations were aligned with Tullow's long-term, ongoing CSR programme.

MSI provided an overview of Tullow's planned Phase 1 Jubilee field development. He said that an exclusion zone would be imposed around the offshore facilities and FPSO and that the EIA would address the effect of the development on fisheries.

AT raised the following concerns:

Discharge of Ballast Water

Ballast water discharge from the shuttle tankers could contain foreign invasive species which could impact on the ecology of the marine environment. He asked how ballast water discharges would be managed.

MSI explained that this issue would be addressed in the EIA. For most projects of this type ballast water discharge from tankers would follow IMO standards (ie shuttle tankers to exchange their ballast water 50 miles offshore).

Upgrade of Takoradi Airport

AT asked if Tullow was planning to upgrade Takoradi airport and harbour.

AK replied that the Ministry of Transport will be responsible for any upgrades that are required and that plans are afoot to upgrade the Takoradi harbour

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ACTION

Meeting minutes

Cote d'Ivoire Border

AT said that the Cote d'Ivoire border and Economic Exclusion Zone (EEZ) needed to be clearly defined as the Jubilee field was located near the border and could be disputed if more oil was found.

AK replied that a committee had been established to investigate the extension of Ghana's EEZ under the provisions of the UNCLOS. Official delineation of the maritime boundaries is expected to be finalised in due course. However, the two countries have a mutual understanding of their maritime boundaries which had governed the limits of oil exploratory activities for several decades.

Safety Zone and FPSO

AT asked how the safety zone around the FPSO will be implemented and if it would be buoyed. MSI replied that the safety zone was variable as the FPSO moved with wind and current around the turret. A buoyed system would not be practicable given the need for vessel movements within the area. FPSO will have radar and radio communications on board to detect and warn vessels that come near the safety zone. A standby vessel will be with the FPSO and can help to maintain the safety zone. AK added that a minimum of 500 m safety buffer zone will be declared around the rig and FPSO.

Exclusion of fisheries

ERM-ESL team gathered from the staff of the Fisheries Directorate that fishing occurs in the Jubilee area mainly for tuna, sharks and other pelagic species. Vessels include large industrial pelagic trawlers as well as artisanal canoes with outboard engines. There are fishermen in Accra who travel seven days to the Jubilee area as fish densities are reported to be high around the rigs. Most of the fishermen in the Jubilee area are from Axim and other fishing villages in the Western Region. Line fishermen only operate in areas with rocky bottom. Poaching for tuna by foreign vessels also occurs in the area. A sub-regional fisheries surveillance committee based in Tema, Ghana could be of assistance in warding off poachers who may come close to the Tullow operational area.

AT said that the EIA would have to assess the impact on fisheries due to the loss of access to fishing grounds. The EIA should also consider the potential impact of an oil spill on livelihoods of shoreline communities.

MSI explained that fishing vessels would only be excluded from a small area around the FPSO. If there is further development in this area then a greater area would be excluded and would lead to cumulative effects. Tullow's approach to dealing with the safety exclusion zone would require a combination of education and enforcement. It would be illegal for fishing vessels to enter the safety zone around the FPSO. The navy would intervene if vessels refuse to stay away from the safety zone.

Alternative livelihoods

AT notes that fish stocks have dwindled over recent years and that Tullow could consider supporting alternative livelihoods for fishermen who are excluded from traditional fishing grounds in the Jubilee area. The Ministry tried to encourage fish farming but faced a lot of opposition from fishermen who

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preferred to catch fish. However, because fish stocks are declining, aquaculture may now be a more attractive alternative for sea fishermen. Fish farming can provide a regular income while fishing is limited to the fishing seasons in July-September and January-February.

Flaring

SA asked if flaring was planned as this could affect fish ecology. MSI replied that there would not be constant flaring but intermittent flaring may be required during certain operations such as startups and maintenance. It was also noted that the FPSO would have lights at night as it operates 24 hrs a day.

Fisheries Committee

AK asked if the MoF would be interested to participate in any committee that may be set up for ongoing consultations with the oil companies. AT affirmed that they would.

AT provided contact details for other interested and affected parties.

- Fisheries Committee of West Central Gulf of Guinea (under FAO)
Tema Office: Serafim Didi Nadjie tel. 020 758 6321
- Regional Fisheries Officer - Takoradi
Mr Alexander Addo tel. 020 773 5391, tel. 031 250 36/37

AT referred the EIA team to the following sources of information.

- Fisheries data from the Regional Director of Fisheries
- EPA's Integrated Coastal Zone Management;
- 2004 canoe frame survey data for the Western Region; and
- Data from upcoming fisheries survey by Norwegian research vessel (contact Ministry of Energy / EPA).

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Meeting minutes

Subject/Ref Tullow Phase 1 Jubilee Field Development EIA

Venue Ghana Maritime Authority, Accra, Ghana

Date of Meeting Friday 6 February 2008

Present Capt. Kofi Micah (KM) (GMA), Mark Irvine (MSI) (ERM), AK Armah (AK) (ESL), Albert de Jong (AdJ) (ERM)

Distribution To attendees via email

Date 6 February 2009

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NOTES

KM indicated that since the previous meeting with Tullow, ERM and ESL in November 2008, he had reviewed the Scoping Report and that he had provided comments to the EPA.

AK said that the purpose of the meeting was to provide an update on the EIA process and obtain any further comments.

A copy of the Scoping Report and the Background Information Document were handed to KM.

AdJ provided an overview of the project and explained some of the issues that the EIA team had identified.

Exclusion Zone

KM stated that a standard 0.5 mile safety zone is usually applicable to offshore facilities. For the proposed FPSO the GMA is considering the need to extend this surface safety zone depending on the extent of subsea infrastructure.

MSI added that the GMA should take into account the fact that the FPSO would be able to swivel around a turret and will also have shuttle tankers attached. Details of the length of the vessels and connection pipes was not finalised but a 1000m radius exclusion zone may be required.

A working anchorage was established off Tema for vessels to anchor in stormy conditions. The GMA is suggested that a working anchorage be established offshore Takoradi where shuttle tankers can anchor when waiting to approach the FPSO.

KM said that Tullow would have a problem with fishing vessels that come too close to the offshore facilities. Currently fishermen fish in the Jubilee area as the rigs are considered to attract fish.

Shipping Routes

KM confirmed that there are no shipping lanes offshore Ghana as the volume of shipping traffic did not justify this. Commercial shipping traffic routes are closer

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to shore (5/6 miles) from shore therefore some distance from the jubilee field. It would be necessary for the offshore facilities to be charted.

Security

KM suggested that Tullow apply for a security clearance from the national security coordinator. This will enable them to seek naval assistance if unauthorised vessels do not want to leave the safety zone.

Tullow

Legislation and Conventions

Ghana ratified Annexes 1 and 2 of MARPOL. A draft bill has been prepared to adopt MARPOL Annexes 1-6 into legislation. If parliament approves this bill, a Ghana Marine Pollution Act will be passed. Lead time for this could be 12 months.

Ghana has not ratified conventions pertaining to ballast water discharge. Ghana Government intends to ratify then adopt the Ballast Water Management Convention and Bunker Convention. For ballast water discharges visiting vessels should discharge ballast water 50 miles from Ghanaian waters. Currently this requirement is enforced through safe operation legislation and the inspection of records of vessels visiting ports.

Classification of FPSO

KM said that, in terms of MARPOL (Regulation 39) the FPSO was not classified as an oil tanker as it will be a stationary and would not be bunkering oil but offloading it. The double hull requirements of MARPOL therefore are not applicable to the FPSO.

KM mentioned that MARPOL requirements are getting stricter and may therefore require FPSOs to have double hulls in future. The GMA's suggestion in its comments on the Scoping Report was based on potential future requirements.

The size of holding tanks eg sludge tanks, on the vessel would need to comply with GMA's requirements.

KM requested that Tullow liaise with the GMA regarding local maritime standards and FPSO design requirements.

Tullow

Liability and Insurances

The IOPC is only applicable to moving vessels. GMA was concerned that the FPSO did not qualify for compensation to Ghana's administration in the case of an oil spill. The Government of Ghana therefore requires minimum US\$ 1 billion insurance cover per occurrence for oil spill.

Other

Details of the Admiralty chart for the area was provided: BA1383/1384 Lagune Bay to Tema.

The HO West Africa Pilot is likely to have the best current and wind data.

KM provided the following contact details:

Takoradi office number: Captain Kwabena Adu - tel. 031 233 88

Tema office number: Captain Owiredu - tel. 022 207 872

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Subject/Ref Tullow Phase 1 Jubilee Field Development EIA

Venue EPA Regional Office, Sekondi, Ghana

Date of Meeting Monday 9th February 2009 1500

Present Alfred Ayaa (AA) (EPA), George Diowou (GD) (EPA), Kofi Eshun (KE) (EPA), Selorm Ababio (SA) (ESL), Louis Doe Atsiatorne (LD) (ESL), Mark Irvine (MSI) (ERM), Albert de Jong (AdJ) (ERM)

Distribution To attendees via email

Date 10 February 2009

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NOTES

SA introduced the EIA team and thanked the EPA for attending the meeting. AdJ provided an overview of the EIA process and explained that EPA National advised that the EIA can continue to EIA phase. The purpose of the meeting was to update them on the status of the project and to identify any other consultees that we should meet.

A copy of the Scoping Report and 5 copies of the Background Information Document were provided to GD. AA said that the EIA team should consider lodging a copy of the Scoping Report and the local public library.

GD was concerned that comments that EPA regional provided on the Scoping Report (eg legibility of maps) were not taken into account and he expected the Scoping Report to be reissued.

MI explained that minor edits done to address printing errors before EPA comments were received. There is no requirement in the EIA Regulations for draft scoping reports to be issued and final versions reissued after comments. MSI considered the maps to be legible and mentioned that these images can be downloaded from the EIA website (given in the brochure). It was stated that EPAs comments on the scoping report and any additional comments can be taken into account when compiling the EIA Report.

EPA indicated some stakeholders to be consulted. The following were identified:

- Friends of the Nation (Chris)
- Care International
- Wasa Communities Affected by Mining
- RC: interests in the coastal zone
- Conservation Foundation
- Regional House of Chiefs representing the chiefs
- Paramount Chiefs
- Awulae Annor Agyei - influential chief
- Western Region non-Governmental Organisation (Don Chris Nevuta - 0244520686)
- The Media

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GD stated that he considered that there should have been Public Hearings at the scoping stage. EPA recommended that extensive consultations be undertaken during the EIA so that issues had been dealt with prior to public hearings. KE added that it would be better to consult in smaller forums before public meetings were held.

MSI responded that there is provision in the EIA Regulations for Public Hearings at the draft EIA stage and not the Scoping Stage and we consider that the appropriate time for public meetings is after the statutory stakeholders have been consulted. MSI continued that the EIA consultations are aligned with Tullow's CSR programme and corporate communications. It would not be possible to address all issues in the EIA but ongoing education and consultation was planned.

GD suggested that 3 local radio stations be contacted to advertise the project.

MI said that this would have to be a Tullow decisions and that the suggestion would be brought to their attention

GD raised the issue of employment opportunities for fishermen as they feel that their livelihoods may be under threat. In addition fishermen from the Western Region considered that they should gain the most as they are closest to the site.

MSI said that there may be some opportunities but the requirement will be small in comparison to the numbers of fishermen. Consultation and education about the industry were considered to be key and Tullow are looking at ways to set up communication links with affected communities..

EPA indicated that fishermen have raised the following issues:

- According to fishermen they have been prevented from fishing close to the rig and that a supply boat without reflectors chased them away.
- Fishermen maintain that the government had allowed fishing trawlers to fish in areas where they had been excluded from.
- Fishermen believe that the project would impact on their livelihoods by preventing them from fishing in certain area.
- Supply boats leaving Takoradi have damaged nets

A copy of the Scoping Report and copies of the BID were left at the Western Regional Library with Mr Joseph Laryea Boye (tel. 03146816, email. jlboye@ghanalibraryboard.org).

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Meeting minutes

Subject/Ref Tullow Phase 1 Jubilee Field Development EIA

Venue GPHA Regional Office, Takoradi Port, Ghana

Date of Meeting Tuesday 10 February 2009

Present Jacob Hyde-Cooper (JHC) (GPHA), Capt E Afadzi (EA) (GPHA), Peter Amoo Bediako (PAB) (GPHA), Louis Doe Atsiatorme (LD) (ESL), Albert de Jong (Adj) (ERM)

Distribution To attendees via email

Date 10 February 2009

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NOTES

LD introduced the EIA team and thanked GPHA for attending the meeting. Adj provided an overview of the Jubilee Phase 1 development and objectives of the meeting. One copy of the Scoping Report and two copies of the background information document were handed to JHC for review and comment.

JHC and PAB gave an overview of Takoradi Port:

Takoradi harbour was built in 1928 to handle both imports and exports. Its strategic location between Tema and Abidjan ports makes Takoradi port a main transport gateway for the middle and northern parts of Ghana as well as land-locked countries such as Burkina Faso, Niger and Mali.

Annually the port handles an average of 600 vessels, 37% of Ghana's seaborne traffic. Main exports include manganese, bauxite, forest products and cocoa beans. Imports include clinker, wheat, petroleum products and containerised cargo. The port has a covered storage area of 140,000 m³ and an open storage area of 250,000 m³ in addition to private warehouses in the port area.

Berthing facilities at the port include eight berths with lengths ranging between 120 and 225 meters. The maximum draft at the wharf is 10 m. Currently, support vessels for offshore oil exploration activities are serviced at berths 5 and 6.

Vessels calls for the Port of Takoradi has increased from 512 in 1999 to 699 in 2005 and then decreased to 615 in 2008. Total port traffic has increased from 2.62 million tonnes in 1999 to 4.72 million tonnes in 2006 and decreased to 4.02 million tonnes in 2008. A draft master plan has been prepared for the port and currently being reviewed by GPHA management.

On average, one oil support vessel calls at the port each day with a maximum of four support vessel calls per day. Oil companies supply most of their equipment and supplies to their operations base at Takoradi port via ship.

Waste Management

The harbour does not have a waste management plan. At present waste from

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support vessels are handled by a third party contractor, Zeal Environmental, based at Takoradi port. Solid and liquid waste is collected from support vessels and treated and disposed of by Zeal. Waste volumes are recorded and waste certificates issued. Non-hazardous solid waste is collected and disposed of at Sorfo krom landfill site. Typical volumes of waste from a support vessel are: 12 m³ waste oil, 30 m³ garbage and 20 empty chemical drums per month (Zeal records for January 2009). Waste oil is pumped via a pipeline to a storage facility at the port and kept in aboveground storage tanks. Waste oil is then transferred to road tankers and taken to the Takoradi Tema waste oil treatment plant at Abwusi where it is separated and treated. Empty chemical drums are currently stored in a locked shed at Zeal Environmental's offices at the port. The drums used to contain versacoat and versathin. The drums are crushed and Zeal is looking at selling it as scrap metal. Zeal Environmental is planning to establish a treatment facility at Takoradi port in near future. The unit is manufactured in the US at the moment and installation will likely take place in June 2009.

Port capacity

GPHA reported that currently they do not have any constraints to handle operations of the supply vessels even during the peak seasons because Tullow says at the peak season (March - December) they can do double berthing.

Oil spill plans

The Harbour has a draft Oil Spill Response Plan in the draft stage to be finalised. All tugs have some oil spill equipment such as booms. Expansion of the oil industry has also been taken into account in the master plan for the port that currently being developed.

Concerns

GPHA did not raise any concerns related to oil exploration/development activity at the port. Adj said that they could review the Scoping Report and BID and provide the EIA team with any comments that need to be considered in the EIA.



ENVIRONMENTAL IMPACT ASSESSMENT: PHASE 1 JUBILEE FIELD DEVELOPMENT

ATTENDANCE REGISTER

Meeting location: GPHA, Talwadi Date: 10/02/2009

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Subject/Ref Tullow Phase 1 Jubilee Field Development EIA

Venue Fisheries Directorate, Takoradi

Date of Meeting Tuesday 10 February 2009

Present Alexander Addo (AD), Rex Quick (RQ) and Emanuel Appiah (Tullow), Mark Irvine (MSI) (ERM), Selorm Ababio (SA) (ESL)

Distribution To attendees via email

Date 10 February 2009

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NOTES

RQ introduced the group to AD and indicated that the meeting was a follow-up to previous meetings during the scoping stage of the project.

MSI gave a broad overview of the Jubilee project and informed AD about submittal of scoping report to EPA in December 2008. He indicated that notice of the scoping is being advertised over a three-week period in the national newspapers. A copy of the scoping report and three copies of the BID brochure was given to AD.

AD described the functions of his unit and the MFRD in relation to monitoring and collection of data on fisheries in Ghana. Fishing is mainly artisanal with 11,000 canoes in the Western Region. In addition there were 300 inshore vessels, 2 shrimpers and about 60 larger vessels including trawlers and tuna boats. These mainly land in Tema and Takoradi.

He then raised issues concerning following:

- Fishermen need to be educated to understand about the project for example to understand the need for and operation of the exclusion zone.
- A Fisheries Impact Assessment as described in the 2002 Fisheries Act (Act 625), if the project was likely to significantly impact on the fishery resource.
- Concern amongst fishermen about wider area exploration and being excluded out of their fishing grounds as a result of the project.
- The security of the oil producing facilities, particularly piracy and theft. The Navy is poorly equipped and needs improvement to manage fisheries properly.
- The need for technology transfer to Ghanaian locals, particularly in relation to oil exploration and exploitation and for alternative livelihoods for fishermen.

AD recommended meetings with leaders of fishermen groups and associations in the region and promised to provide a list of active groups and associations in the region to Tullow. Recommended meeting chief fishermen and

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representatives of fishermen's associations.

The Ministry of Fisheries set up the Association of Chief Fishermen. Also need to contact The National Fishermen's Association of Ghana, Inshore Fishermen's Association, the Canoe Fishermen's Association and the CB Fish Mongers Community (CBFMC).

The Fisheries Research Unit at Tema (Contact Mr Quartey) undertakes canoe frame surveys and stock assessments. Latest is the 2004 frame survey.

RQ mentioned the willingness of Tullow to aid the fishery directorate and fishing industry in general, as part of Tullow's CSR. He asked AD to consider projects that may be worth investing in by Tullow and which will be beneficial to the fishery industry in the region.

ACTION



ENVIRONMENTAL IMPACT ASSESSMENT: PHASE 1 JUBILEE FIELD DEVELOPMENT

ATTENDANCE REGISTER

Meeting location: TAKOROI DOF Date: 10/2/9

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Meeting minutes

Subject/Ref Tullow Phase 1 Jubilee Field Development EIA

Venue Shama District Assembly offices, Ghana

Date of Meeting Wednesday 11 February 2009 @ 10h00

Present Please refer to attached attendance register.

Distribution To attendees via email

Date 11 February 2009

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NOTES

The District Coordinating Director, David Gorman Hammond, welcomed the EIA team and introduced the members of the district assembly. After the meeting was opened with prayer, KE thanked the assembly for meeting with the team and the team members introduced themselves. KE introduced Tullow and the proposed Phase 1 Jubilee project. MSI provided an overview of the EIA and consultations process and OA presented Tullow's Corporate Social Responsibility framework.

He mentioned 4 areas the frame work covers. These are

- Education
- Health
- Enterprise development
- Biodiversity Conservation

The following comments were raised at the meeting:

How is Tullow planning to engage local fishermen and coastal communities to obtain their inputs and concerns? What impacts will there be on the coast?

The Jubilee development is located 60 kilometres offshore and is not expected to have significant coastal impacts. Possible impacts relate to exclusion of fishermen from the safety zone around the FPSO and oil spill impacts in the unlikely event of a spill. Tullow started engaging with fishermen in the central and western regions since they started with exploration in Ghana. Tullow has started consulting with chief fishermen and will continue to engage with these stakeholders as part of Tullow's CSR programme. The district assembly is regarded as the starting point of formal communications for the EIA.

Can Tullow provide a checklist for the contents of the EIA?

There is no checklist for the EIA as such. Issues that have been identified are outlined in the Scoping Report. The EIA team would like stakeholders to raise any concerns they may have and do not want to restrict them to a checklist.

Will the EIA capture possible impacts and provide management plans?

Yes, the EIA will identify and assess all significant impacts. Mitigation commitments will be outlined in a framework environmental management plan.

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In addition, detailed emergency plans, including an oil spill contingency plan, will be developed by Tullow.

How will Shama District benefit from the project?

The design and operation of the development is not labour intensive and require highly technical skills. Most of the work will be done by foreigners and only a small number of job opportunities will be created for local people in the short term. However, the project will benefit Ghana's economy and it is important that the government ensure fair distribution of the benefits. Lessons can be learnt from how other countries have dealt with their oil eg Nigeria and Norway to ensure that benefits from oil are distributed equitably. One of the focus areas of the CSR programme is education. Education would be a long term initiative to empower local people and enable them to work in the oil industry in future. Enterprise development is another focus of the CSR programme and will aim to develop enterprises that can supply the oil industry with services and commodities.

How will Tullow manage the impact from gas emissions during operation?

Tullow plans to inject associated gas and only a small amount will be vented or flared intermittently during certain operations. In order to exploit the gas it would need to be captured. Associated gas may be used to generate electricity in future.

What emergency response and protection mechanisms will Tullow have in place?

Tullow is developing an oil spill contingency plan and mitigation for environmental and social impacts will be implemented by means of an Environmental Management Plan.

The EIA is a comprehensive document and it would be useful if the impacts and benefits can be explained to stakeholders?

Stakeholders' comments and concerns are captured during the current consultations. After the EIA report has been compiled, benefits and impacts of the proposed development will be presented to stakeholders.

People in the District have high expectations of the oil. How will Tullow manage these expectations?

As a responsible company, Tullow will continue to consult with people in the district and educate them about the oil operations. It is important that people realise that the project will not create many jobs and equitable distribution of monetary benefits would be the responsibility of the government.

How will Tullow work with Shama District to support development and how soon and how much will be allocated to this district?

In line with Tullow's CSR framework, Tullow will continue to engage with the district assembly to understand their needs. Assemblies of the districts would also be consulted. Tullow will have to be fair in the distribution of their support between different districts to avoid benefitting one district over another. The CSR programme would only be effective if identified projects are aligned with community needs. The assembly should not change their budgets and CSR projects have been agreed with the community.

How will Tullow ensure that they are ready to respond to an oil spill?

The EPA is responsible for national oil spill contingency planning. An OSCP was