

## Reportable Environmental Management Plan Situations

A total of five non-compliance situations were identified during the first half of 2011, two at Level II and three at Level I. The project also responded to one reportable spill, which was quickly contained and cleaned up with no lasting harm to the environment. The project has taken action in each case to remedy the issues and prevent future occurrences.

**Spill** *11 March:* A mechanical seal failed at KG162 manifold station in the Komé oilfield, spilling about 20 barrels of produced water on the ground. The affected soil was removed for proper disposal.

**Level II Non-Compliances** Two Level II non-compliances were identified in the first half of 2011 and both have been closed out by corrective action. The Environmental Management Plan sets out the criteria for identifying non-compliance situations. For more on this topic see the end of this chapter.

*January:* The government's Pipeline Steering and Monitoring Committee issued a Level II non-compliance because of a delay in completing recommended inoculations for meningitis. COTCO has cleared the non-compliance by inoculating all workers as recommended by the Cameroon Ministry of Health. In future, the inoculations will be provided in accordance with the three year cycle recommended for the meningitis vaccine.

*June:* A contractor responsible for pipeline right of way maintenance was failing to pay the people doing the work in a timely manner. There have been repeated wage payment problems with the contractor, including the issuance of a previous Level I non-compliance. The contractor was ordered to immediately pay the workers and was also warned that further occurrences could result in cancellation of the company's contract.

Reportables Tally for 1st & 2nd Quarters

◀ Total Reportable Situations by Country

	<b>1st Qtr 2011</b>				<b>2nd Qtr 2011</b>			
	<b>Level I</b>	<b>Level II</b>	<b>Level III</b>	<b>Total</b>	<b>Level I</b>	<b>Level II</b>	<b>Level III</b>	<b>Total</b>
Chad	0	0	0	0	0	0	0	0
Cameroon	1	1	0	2	2	1	0	3
<b>Total</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>3</b>

◀ Non-Compliance Situations by Company

	<b>1st Qtr 2011</b>				<b>2nd Qtr 2011</b>			
	<b>Level I</b>	<b>Level II</b>	<b>Level III</b>	<b>Total</b>	<b>Level I</b>	<b>Level II</b>	<b>Level III</b>	<b>Total</b>
COTCO	0	1	0	1	0	0	0	0
Polyclinic Bonanjo	1	0	0	1	0	0	0	0
3N	0	0	0	0	1	1	0	2
Emploi Service	0	0	0	0	1	0	0	1

◀ Non-Compliance Situations by Category

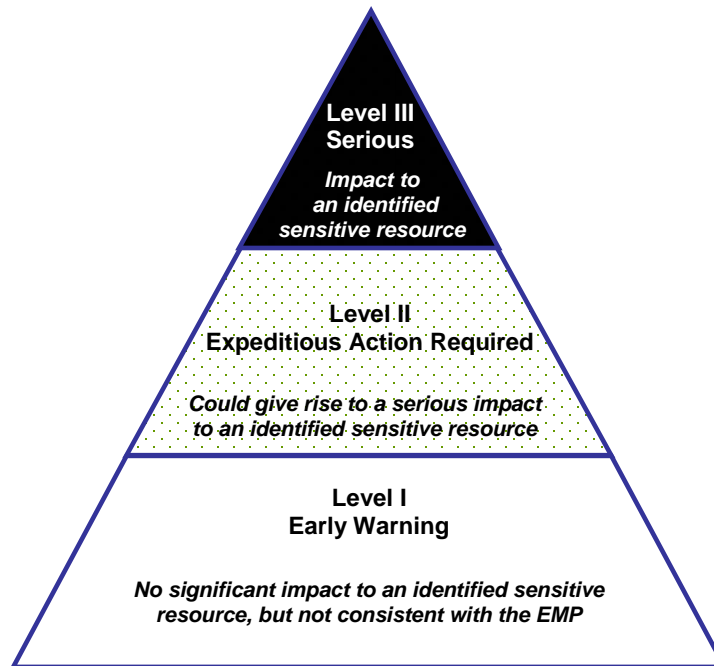
	<b>1st Qtr 2011</b>				<b>2nd Qtr 2011</b>			
	<b>Level I</b>	<b>Level II</b>	<b>Level III</b>	<b>Total</b>	<b>Level I</b>	<b>Level II</b>	<b>Level III</b>	<b>Total</b>
Health/Occupational Health	1	1	0	2	0	0	0	0
Socioeconomic	0	0	0	0	2	1	0	3
<b>Total</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>3</b>

**Context:** The project's Environmental Management Plan includes reporting standards for non-compliance situations and for spills. The standards provide methodical and consistent mechanisms for measuring performance on environmental protections and spill prevention.

**EMP Reporting**

### Non-Compliance Situations

The project's three-level ranking system for EMP non-compliance situations was designed to provide an early warning mechanism to detect issues and help correct non-compliant behaviors and practices well before they became serious enough to cause damage.



This pyramid illustrates the project's early warning system approach for identifying and managing EMP non-compliance situations. The first two levels serve to alert the project to potential environmental impacts. Only the top level, Level III, indicates actual serious environmental impact to a defined sensitive resource.

### Spills

The Environmental Management Plan requires the reporting of spills of one barrel of oil, 10 barrels of produced water or 100 kilograms of a chemical.

