

Attachment A: Comments and Recommendations



Project Name: Project Lightning
Project Proponent: Abu Dhabi National Oil Company - ADNOC
Environmental Consultant: Anthesis Consulting
Type: Environmental Impact Assessment (EIA)

#	Section Title	Page	Comments / Recommendations
1.	General		<ul style="list-style-type: none"> ○ EAD requests a commitment letter from ADNOC related to work time and duration in identified critical locations during the meeting conducted on July 6, 2022. ○ All points discussed in the meeting conducted on July 6, 2022 should be communicated and addressed in a different CRS. ○ Mangrove management plan: <ul style="list-style-type: none"> - Once the contractor is assigned, communicate to EAD if mangrove removal will be required. - EAD should approve the plan before any removal/relocation is commenced. ○ If thermal discharge was required, temperature of water should be recorded before discharge and reflected in the audit and monitoring report. ○ All personnel on site should be trained for spill and contamination control and mitigation. ○ High density areas of coral reefs and seagrass should be avoided as much as possible when placing the cables. ○ EAD should be notified immediately in case of any incidents or finding of harmed marine mammals
	4.3.2.2.2. Intertidal and Marine Works – Disposal locations (Route 1)	205	<ul style="list-style-type: none"> ○ South disposal location should be avoided and used only when critically required. Proper mitigation measures and correct silt screening placement should be implemented when usage.
2.	Table 5-5: Potential air quality impacts and mitigation measures	307	<ul style="list-style-type: none"> ○ Point No.4: Add dust suppression using water as a mitigation measure. ○ Work should be stopped during windy conditions to prevent increase of sediment on mangrove habitats near onshore construction.
3.	5.2.1.2.3. WKC Baseline Survey Results	342	<ul style="list-style-type: none"> ○ Exceedances in nitrate, cadmium, copper & lead were detected, implementation of mitigation measures is crucial to avoid deterioration in marine water quality. This should be considered for both locations as exceedance is recorded in both.
4.	Temperature Impact and Potential Contamination of Seawater from Cooling Water Discharges of Dredging Equipment	436	<ul style="list-style-type: none"> ○ Water used for cooling should not be discharged directly back into the water, a cooling basin on dock should be created for the purpose of cooling the water before the discharge. Corals are highly sensitive to temperature fluctuations which can lead to imbalances in marine environment and lead to adverse impacts.
5.	Table 5-28: Potential marine water impacts and mitigation measures	438	<ul style="list-style-type: none"> ○ Silt curtains should be inspected on a weekly basis minimum by divers and drop-down cameras. ○ Ensure proper placement of silt curtains and they should be immediately replaced if damaged.
6.	5.4.4.1.1. Dewatering	497	<ul style="list-style-type: none"> ○ Dewatering samples shall be recorded and reflected in the audit report.
7.	Table 5-81: Potential marine ecology impacts and mitigation measures	660	<ul style="list-style-type: none"> ○ Silt curtains should be installed correctly, inspected frequently, and immediately replaced when damaged. Extra silt curtains should be available near the project site at all times. ○ In case of Emergency contact EAD immediately
8.	Compensation	732	<ul style="list-style-type: none"> ○ Compensation should be the last resort and avoided at all costs.

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هيئة البيئة - أبوظبي
Environment Agency - ABU DHABI

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9.	Project Lightning Environmental and Social Impact Assessment June 2022 857 Table 5-147: General summary of construction impacts	884	<ul style="list-style-type: none">○ Disturbance to local Hadrah fishing activities: ADNOC should agree with hadrah owners on a proper compensation and reach an agreement.
10.	Table 5-166: Awareness induction content	905	<ul style="list-style-type: none">○ Training should include marine mammal observation and silt curtains affectivity training.○ All employees on site should get an environmental training and practice for marine water sampling, sediment monitoring and noise.
11.	Monitoring and Audit report	-	<ul style="list-style-type: none">○ Monitoring and audit reports should be submitted quarterly covering but not limited to the following:<ul style="list-style-type: none">- Marine mammal sighting record includes date and time- Marine water quality sampling and turbidity measurement- Temperature of discharged water.- Monitoring report should include pictures of placement of cables in abundant locations of critical habitats like corals and seagrass.- The health status of corals and seagrass should be reflected in the monitoring reports with before and after cable placement images.

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