

Fisher Management and Livelihood Restoration Plan

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

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Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

TABLE OF CONTENTS

1	Introduction	5
1.1	Objective	5
1.2	Scope	6
2	Definitions	7
3	Project Background	8
3.1	Fishing Sector Baseline Context	9
4	Administrative Framework	20
4.1	National Requirements	20
4.2	International Best Practices Requirements	20
5	Principles	22
6	Potential Impacts and Project Responses	25
6.1	Potential Impacts On Boat Based Fishermen	25
6.2	Potential Impacts On Lobster Fishermen and Tuberos	27
6.3	Potential Impacts On The Operations Phase	28
7	Consultation	29
8	Assessment of Fishing Activities and Affected People	31
8.1	Census	31
8.2	Impact Assessment	¡Error! Marcador no definido.
9	Eligibility	33
9.1	Eligibility Policies	33

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

10	Vulnerability_____	¡Error! Marcador no definido.
10.1	Principles _____	¡Error! Marcador no definido.
10.2	Assessment of Risks _____	¡Error! Marcador no definido.
10.3	Project Approach _____	¡Error! Marcador no definido.
10.4	Monitoring and Assistance Measures_____	¡Error! Marcador no definido.
11	Managing Impacts _____	34
11.1	COMPENSATION AND PROJECT PROPOSED LIVELIHOOD RESTORATION MEASURES AND MANAGEMENT PROGRAMS _____	34
11.2	Preliminary Proposed Livelihood Restoration Measures _____	36
12	Grievance Mechanism _____	38
13	Timeline and Responsibilities _____	40
13.1	Timeline _____	40
13.2	Action Plan _____	40
13.3	Responsibilities _____	41
14	Monitoring and Ongoing Improvement _____	43
14.1	Monitoring _____	43
14.2	Ongoing Improvement _____	45

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

1 Introduction

The Energía del Pacífico (EDP) Project (Project) is expected to result in economic but not physical displacement to fishers, as these are defined in the IFC Performance Standards on Environmental and Social Sustainability (2012), specifically Performance Standard (PS) 5. Economic displacement refers to the loss of assets or access to assets that leads to loss of income sources or means of livelihood as a result of project-related land acquisition or restriction of access to natural resources. On the other hand, physical displacement is described as the “loss of shelter and assets resulting from the acquisition of land associated with a project that required the affected person(s) to move to another location” (IFC, 2002). As there will not be relocation nor loss of shelter, the Project is not expecting to result in physical displacement. In order to align with PS 5, EDP has developed this Fisher Management and Livelihood Restoration Plan. Restoring livelihoods means not only restoring incomes, but also restoring capacity in regards to human, social, financial, natural, and physical resources or capital.

This Fisher Management and Livelihood Restoration Plan (FMLRP) details the measures that will be enacted to assess and resolve the Project’s impacts on the livelihoods and fishing activities of communities located in the Project’s Area of Influence (AOI). The Plan will be implemented in the construction phase, but monitoring activities will also be carried out during the operations phase. The Plan will provide an understanding of fish resources, fishing activities, and fishing-based livelihoods, such as potential Project impacts on fishing subsistence and artisanal fisheries and cooperatives. Several mitigation and compensation measures are provided as part of this Fisher Management and Livelihood Restoration Plan.

1.1 OBJECTIVE

The objectives of this FMLRP are:

- To comply with applicable Salvadorian regulatory requirements and align with international lender standards, including the IFC Performance Standards (see *Section 4.2*);
- To generate a series of methods and activities to update the fishing sector socio-economic baseline and provide an understanding of Project-affected fish resources and habitats, fisheries, and fishing-based livelihoods, including fishing grounds, fishing practices, and the value chain;
- To establish mitigation measures and compensate fishers for lost livelihood;
- To identify monitoring requirements, including evaluation and reporting during the preparation, construction, and operation phases of the Project;

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

- To describe the concrete steps necessary to implement the monitoring and evaluation program; and
- To define organizational resources, logistical requirements, and roles and responsibilities for implementing the measures and monitoring described herein.

The FMLRP will undergo review and updating as part of the Project's Management of Change Directive (EDP-ESMS-DIR-007), which uses monitoring information to determine the efficiency of the controls being implemented, identify opportunities for continuous improvement, and adjust control measures and management procedures.

1.2 SCOPE

This plan forms a part of EDP's ESMS document system. It covers all EDP activities related to the marine component (FRSU and pipeline) and the Power Plant in Acajutla. The Transmission Line has no impact in fisheries. It includes activities carried out on EDP's behalf by contractors and subcontractors. The plan does not substitute any other legal means.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

2 Definitions

The following IFC definitions from the publication titled *Addressing Project Impacts on Fishing-Based Livelihoods Handbook* (IFC, 2015) are used in this FLRP.

TERMS	DEFINITIONS
Fish resources	Fish and other fishing products, the aquatic environment, and the ecosystems in which these resources exist.
Fisheries	All livelihood activities of small-scale subsistence and artisanal fishermen related to access to and utilization of fish resources, including harvesting (i.e., fishing and capture of other marine products, such as harvesting of seaweed, bivalves, and crabs), processing (e.g., salting, drying, smoking, food preparation), and distribution and marketing (i.e., the entire value chain).
Fishing-based livelihoods	Livelihoods that include and are substantially dependent on fishing for subsistence and/or income.
Fishing Sector	All stakeholders involved in fishing activities, including fishermen, fish cooperatives, people selling fish, and fish marketing.
Fishers/ Fishermen	A person who catches fish for a living.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

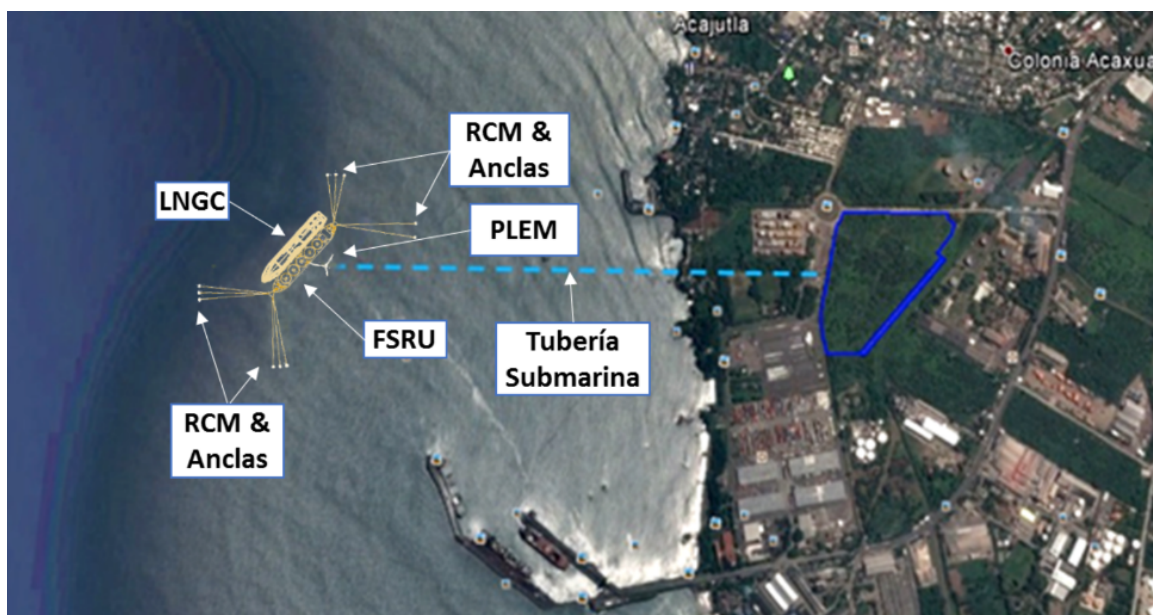
3 Project Background

The "LNG to Power" component of the Project consists of the installation of a thermal power plant (the Power Plant) for the generation of electric power with a net capacity of 378 MW using natural gas as fuel. The Power Plant will be located in the Port of Acajutla, El Salvador. The natural gas will be shipped to Acajutla as liquefied natural gas (LNG). It will be converted to natural gas at a Floating Storage and Regasification Unit (FSRU) held in place by means of Restricted Catenary Mooring (RCM). The FSRU will be located approximately 1,400 m from the coast in Acajutla, where the depth of water is approximately 17 m. The natural gas will be transported from the FSRU to the Power Plant via a 24" diameter pipeline installed with Horizontal Directional Drilling (HDD) (Figure 3-1).

The FSRU will be a permanently anchored boat (the *Gallina*). The Project will also utilize a mobile boat provided by Shell that will unload LNG for a maximum of three days, after which it will leave. It is estimated that this boat will come to Acajutla approximately three times per year. The FSRU (*Gallina*) will be used for storage and regasification. The pipeline is designed to be underwater and underground, and it will therefore be unseen once installed.

Electricity generated at the Power Plant will be connected to the national grid via a new, 44 km long, 230 kV transmission line (the Ahuachapán-Acajutla Transmission Line)(Figure 3-2).

Figure 3-1: Final design of the LNG to Power component of the Project.



Source: EDP 2018

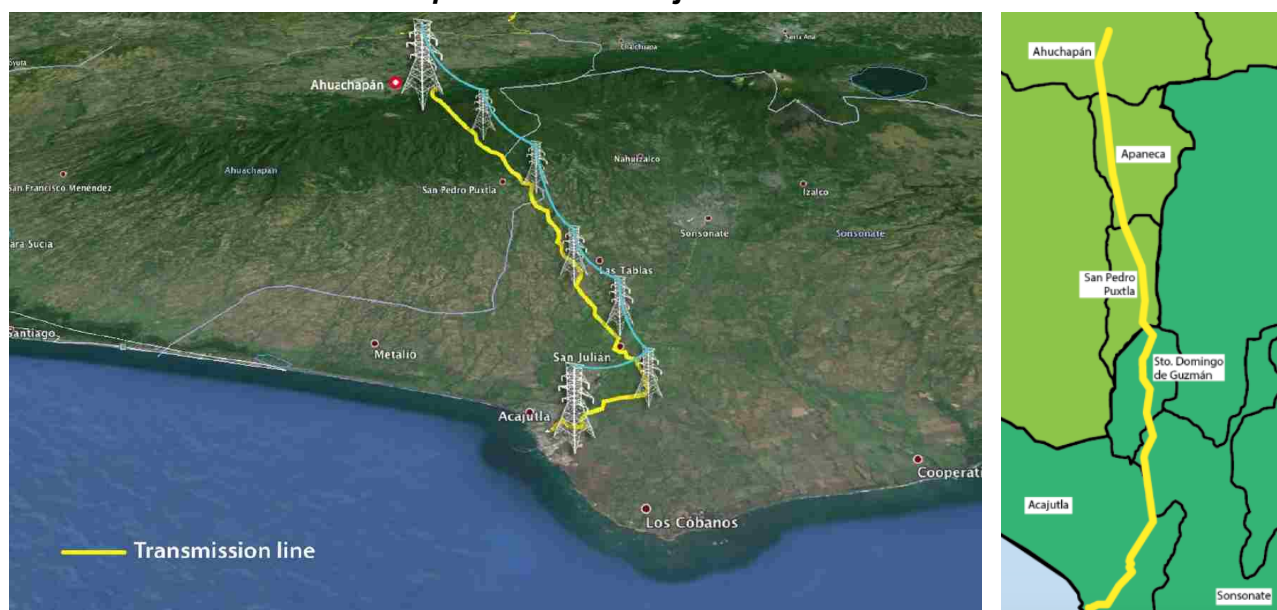
The Transmission Line (TL) component of the Project will deliver electrical power from the Power Plant substation (Acajutla Substation) to the Ahuachapán Substation (Figure 3-2), which is

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

interconnected to the Interconnection System for Central American Countries (*Sistema de Interconexión para los Países de Centroamérica*), or SIEPAC). A total of 141 transmission towers will be built as part of the Project. Of these, 40 towers will be built in the municipality of Acajutla, 25 in San Pedro Puxtla, 21 in Santo Domingo de Guzmán, 12 in Sonsonate, 28 in Apaneca, and 15 in Ahuachapán. The tower heights will range between 32 and 45 meters, and their width at ground level will range between 5 and 8 meters. The towers are designed to support tension, bending, wind forces, and earthquakes.

The 230 kV line will pass through the communities of Sonsonate, Santo Domingo, San Pedro Puxtla, and Apaneca before arriving at the Ahuachapán Substation.

Figure 3-2: Transmission Line component of the Project.



Source: EDP 2018

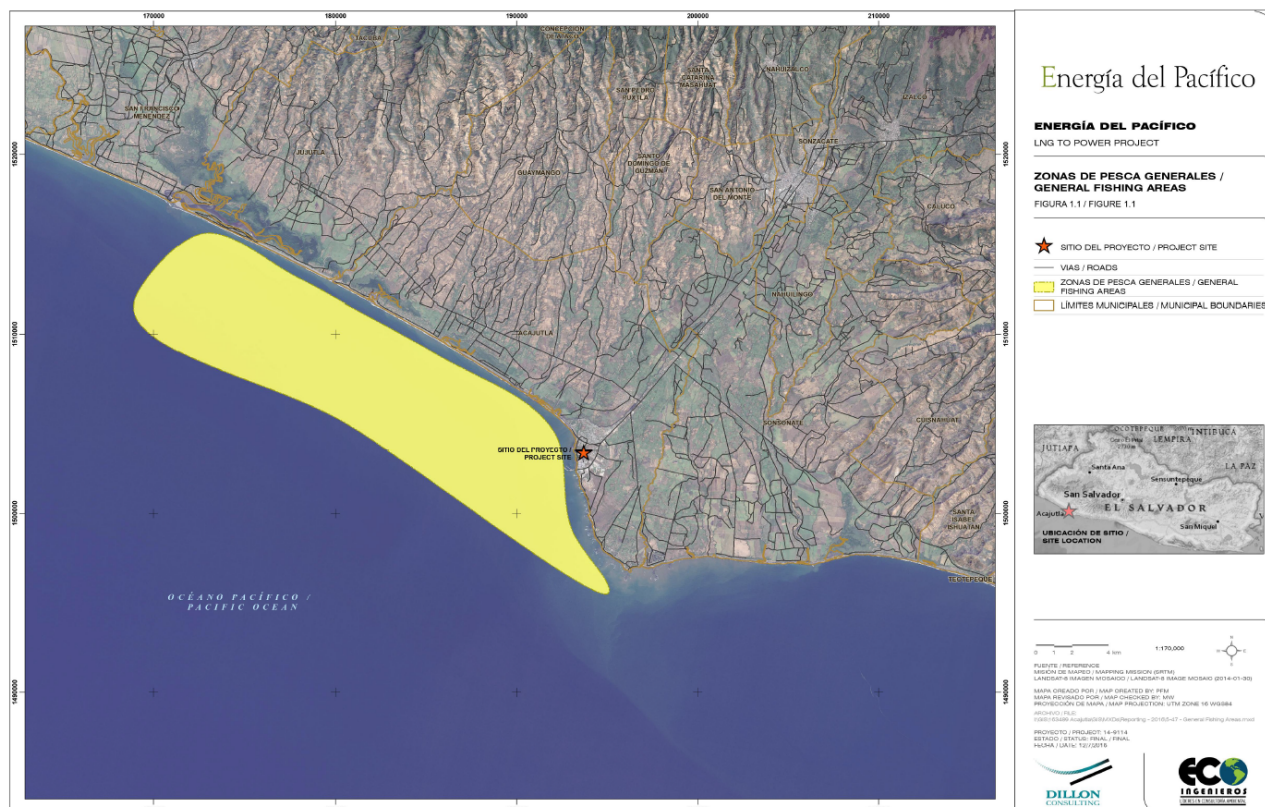
Artisanal commercial fishing will be impacted by the LNG to Power component but not the TL component of the Project. As a result, this FLRP focuses on the LNG to Power component of the Project.

3.1 FISHING SECTOR BASELINE CONTEXT

The overall total fishing area is 143,075 Km², as seen in Figure 3-3. As far as fishing on the high seas goes, the boats usually fish in zones with depths between 10 m and 50 m, all along the coast.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

Figure 3-3: Fishing area for artisanal fishermen from Acajutla.



Source: EIS, December 2016

Traditionally, small-scale fishing is carried out by low-income people living in coastal areas of the country, who find in this activity their main source of income and food security. Artisanal fishing accounts for 50% of El Salvador's total fish production, and it is estimated that the country has 13,000 marine fishermen with 5,700 vessels, as well as 34 cooperatives and two federations who bind these cooperatives together. Fishermen have a greater sense of partnership in El Salvador than in most other Latin American countries, although weaknesses in these partnerships persist.

Artisanal fishing is a type of fishing activity that uses traditional techniques with little technological development. The activity takes place in estuarine and open sea areas not more than 10 miles from shore within what is called territorial sea. It is generally practiced by small boats from 18 to 25 feet in length with an outboard motor. The gear used includes gillnets, nets, and longlines. The fish resources in most demand in El Salvador are coastal shrimp and its associated fauna (e.g. snapper, sea bass, corvina, mackerel, and increasing since 1999 shark), as well as shells or curiles that are manually extracted from estuaries and mangroves.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

The instruments most often used by artisanal fishermen to catch their prey are jackal tail baits that are placed on six, seven, or ten hooks depending on the size of the fish sought, but 20-pound nylon rope and monofilament fishing nets are also used. The usual hours to fish on the open sea are from eleven in the morning until four in the afternoon.

Acajutla is a place where job opportunities are very scarce. Being a coastal city, a good percentage of its residents are therefore engaged in artisanal fishing. Artisanal fishing is mainly practiced from the artisanal pier in Acajutla, which is thus named because all the work done by fishermen there is by hand rather than machinery. Trade occurs within and outside the pier. When the fishermen come back from the open sea with their fish, buyers are usually expected to buy all of their products. These buyers sell it to other people who take it to the market or they have their specific customers who are usually business owners, especially restaurants.

In recent years, artisanal fishermen have commented that they have been affected by the red tide, earthquakes, abuses from industrial fishing boats, and lack of support, which they qualify as apathy from the authorities to give them real help.

According to the study "Development of Artisanal Fishing in El Salvador," the artisanal fishing sector suffers from under-development in the aspects of techniques and fishing control, processing of products, and fishermen organizations, which translates into low productivity. The deterioration of profitability in recent years has reached an alarming level. The rescue of artisanal fishers from poverty is one of the social tasks to be undertaken by the government of El Salvador, according to the same study.

Limitations on artisanal fishing are presented in the same study. Fishing is deteriorating in the area for various environmental and economic reasons. There has been a serious decline in the coastal fishery resources due to natural disasters that have recently affected the country, as well as frequent earthquakes that have apparently altered the dynamics of marine resources and resulted in a deterioration of the environment in fishing areas. In addition, the pressure of overexploitation is gradually affecting the availability of coastal resources, and there have been significant increases in fuel costs.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

Figure 3-4: Acajutla Artisanal Pier.



Source: <http://acajutlateespera.blogspot.com/>

Figure 3-5: Commerce at the Artisanal Pier in Acajutla.



Source: <http://acajutlateespera.blogspot.com/>

3.2 STAKEHOLDERS IN THE FISHING SECTOR

The municipality of Acajutla is one of the main ports in the fishing of various kinds of seafood, and has an important productive sector dedicated to artisanal fishing. This sector is organized through several cooperatives, as well as groups that encompass almost all artisanal fishermen in the municipality. The characteristics of each of these groups are described below.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

3.2.1.1 Asociación Cooperativa de Producción Pesquera del Puerto de Acajutla (ACOOPPAC)

ACOOPPAC is one of the oldest cooperatives of Acajutla, formally constituted on May 27, 1971, and has been a source of work for the entire fishing community of Acajutla and its surrounding areas. They distribute fish to local restaurants, such as Restaurant Acajutla.

In 2016, the cooperative consisted of 57 associates, who worked three days a week and had an average daily income of \$15.00, which generated a weekly income of \$ 45.00 per associate.

According to interviews conducted with their members in 2014 and 2016, they have several fishing zones, one of them known as "El Pedrero," as they commonly call the place near the pier. They also carry out fishing activities near the area where the installation of the underground pipeline is planned, despite being a restricted area for this type of activity due to safety reasons, which lead to them being constantly removed from the area by the authorities. They also use it, however, as a route to get to more distant fishing areas.

According to the Autonomous Port Executive Commission (*Comisión Ejecutiva Portuaria Autónoma*, or CEPA) at the Port of Acajutla, fishermen are removed from this area daily, although there is no problem with passing through the area to other fishing areas. **The Project's pipeline will be underground, therefore it will not permanently interfere with the fishermen's routes. There will likely be certain temporary limitations, however, during the construction of the maritime terminal and the installation of the pipeline.**

Figure 3-6: Artisanal Fishermen in Acajutla.



Source: <http://www.lapagina.com.sv>

According to inquiries made in the field and interviews with experts in the area such as the *Centro de Desarrollo de la Pesca y La Acuicultura* (CENDEPESCA), Acajutla fishermen are constantly changing for the locations where they fish. The members of ACOOPPAC use the "cimbra" method to fish for scale fish and sharks. They go as far as "Punta Remedios - Los Cobanos" to the

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

Southeast (the most common route) or "Playa Metalío" to the northwest to look for their product. Usually, the fishermen travel in a southeast direction to reach this fishing area. Once the Project's terminal and pipeline have been constructed, there will be no major limitations on their fishing routes. The impacts will only be during the construction phase of these Project components.

3.2.1.2 Asociación Cooperativa de Rederos de Acajutla (ACPPRA)

ACPPRA is primarily dedicated to net fishing, especially lobster fishing. It is smaller and has a lower level of organization than ACOOPPAC. In 2016, they had 34 associates who worked six days a week and had an average daily income of \$15.00, which equates to weekly income of \$90.00 per associate.

According to information provided by the cooperative in 2016, daily fishing produces an average of 10 lbs of lobster, 20 lbs of mixed fish revolts, and a smaller quantity of crab. This produced a daily take of up to \$93.00 per day, but they must subtract their daily operating expenses from this take, which average \$ 18.00 in gasoline, \$5.00 for use of the pier, \$5.00 for oil, and \$5.00 of maneuver operations. This results in a total profit of \$60.00 per day, distributed between the boat owner, nets costs, the fishermen, and the captain.

ACPPRA members use fishing nets and the main products they seek are lobsters, oysters, crabs, and fish in smaller quantities, which can be found near the coast. In some cases, however, they may travel farther to seek their product. When they fish near the coast, they do not use boats. They simply swim and use tires to stay afloat. So they do not use fuel unless they travel to more distant fishing areas, such as near "Punta Remedios-Los Cóbano." Their fishing zones are always in the area marked in Figure 3-3. Their routes to fishing areas could be temporarily affected during the construction phase of the Project.

Figure 3-7: Net fishermen working near Acajutla.



Source: <http://www.lapagina.com.sv>

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

3.2.1.3 Asociación Cooperativa de Producción Pesquera Tiburoneros de Alta Mar (ACPETAMAR)

ACPETAMAR de R.L. was established on March 9, 2006. Its members are people engaged in fishing. In addition to fishing, they also now have a plant for the processing of fishery products. At the time of the LNG to Power ESIA baseline studies in 2016, the cooperative had 29 registered members. The cooperative members started marine fishing with shark, but have recently incorporated dorado and tuna into their catch. They are commonly known as "Doraderos," given that among their main products is the fish known as the dorado (Mahi mahi).

Approximately 80% of their partners are dedicated to fishing, while the rest are dedicated to the fishing processing and commerce. There were five women members in 2016, who worked in fish processing and marketing. They process everything they fish. The cooperative's facilities (administrative offices and a processing plant) are located in Acajutla. For the implementation of innovations in marketing, the cooperative and its members have been supported by the Ministry of Agriculture and Livestock (MAG in Spanish) and international cooperation agencies. For example, the Rural Reconstruction and Modernization Program (PREMODER) has provided funding to enable them to make the initial investments, such as for the processing plant.

Something that differentiated this cooperative from the others was that their fishing zones are more distant, where they can find the products of greater size. Among the products they fish and/or sell are:

- Dorado (Mahi mahi);
- Pargo;
- Shark;
- Lenguado;
- Corvina;
- Shrimp; and
- Yellowfin tuna.

Figure 3-6: Products fished by ACPETAMAR.



Source: <http://www.wordpress.com/productos/>

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

They cooperative owned two boats and individual associates owned eight boats in 2016. They stored few products, as they usually had it ready for sale. Buyers payed for product every 30 or 60 days. However, Walmart, one of its main buyers, had a payment mechanism of 48 hours, but charged a 2% commission.

The cooperative also processes tilapia, but instead of fishing it they buy it in San Salvador from Tilapia farms. EDP held a meeting with fishermen on October 17, 2018, and members of the cooperative showed interest in expanding their processing plant. They had a staff of 10 people.

3.2.1.4 Asociación Cooperativa de Producción Agropecuaria y Pesquera Camaroneros de Acajutla (ACOOPESCA)

ACOOPESCA is one of the most recent cooperatives in Acajutla, created in July 2015. In 2016 it had 16 members officially registered. ACOOPESCA fishermen utilize similar fishing techniques and have similar fishing routes as those in the cooperatives of ACOOPAC and ACCPRA. ACOOPESCA's main fishing product is shrimp, which is marketed locally or purchased by local buyers who wait for them when they arrive with their boats to the shore, and carry the product.

ACOOPESCA's President owns a canteen. The cooperative has asked EDP for fishing equipment and two engines. It owns two or three boats which its members take turns using and for which they share the costs (e.g., fuel, motor oil, and ice).

3.2.1.5 Independent Fishermen

Tuberos

Independent fishermen who fish in the area and do not belong to a cooperative were identified when the ESIA baseline studies were carried out. Independent fishermen known as "tuberos" use pneumatic floats and swim up to 3 km in the sea to manually obtain products, mainly oysters and lobsters. This group of people fishes near the Project area, so their activities could be impacted by it. At least 51 tubers were identified in 2016, which were reported through citizen participation activities.

Tuberos use floats or "rim tubes" to swim in the sea – they do not own or use boats. They can fish offshore by mooring to the buoys of Cenergica (an energy company, which participates in the electricity and fuel market in El Salvador and Central America) and floating. They also fish lobsters to the south of the pier. As far as revenue is concerned, a Tubero will usually fish for three to four days a week and earn approximately \$4.00 per day, or approximately \$12.00 to \$16.00 a week. These are estimates since they also fish for their own consumption. Their fishing zones could be temporarily reduced during the construction phase of the Project, so they would have to change the areas where they fish.

During meetings held with EDP in October 2018, Tuberos expressed their interest in other job opportunities, as they are aware that their fishing activities are not sustainable in the medium and long term.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

Figure 3-7: Independent fishers near Acajutla.



Source: LNG to Power EIS, December 2016

Oyster Catchers

Oyster catchers, like Tuberos, are independent fishermen who fish in the area, do not belong to cooperatives, and do not own boats. They also use pneumatic floats but their main fishery product is oysters, which are extracted primarily from the oyster bank located north of the pier. As a result, they will not be impacted by the Project. In 2016, at least six oyster catchers were identified, which were reported through public consultation activities.

3.2.1.6 Fishermen from Other Areas

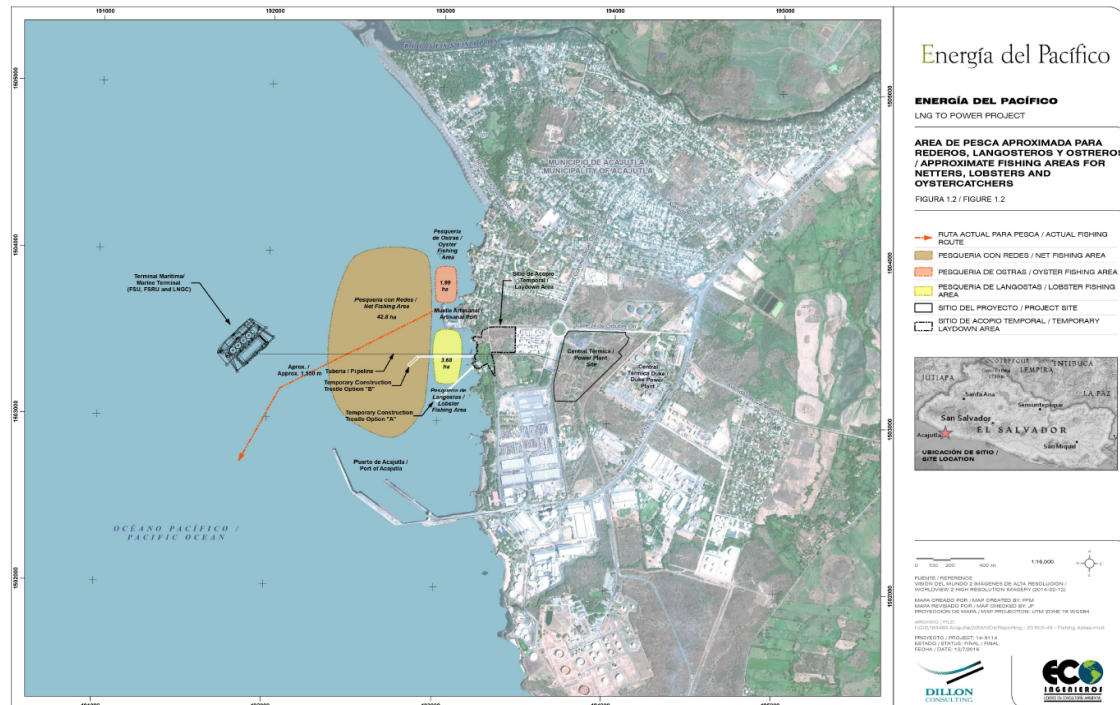
During the LNG to Power ESIA baseline studies in 2016, the existence of a group of fishermen coming from other areas of the country was identified, specifically from the department of La Libertad. They also come from the Pedrero area. The fishermen originating from Acajutla do not like the intrusion of this group in their fishing zones since they are not originally from the area. At least one group of 25 people from the municipality of La Libertad that uses a truck to get to Acajutla to fish was identified. They visit other areas on the coast as well between La Libertad and Acajutla. According to the ESIA baseline studies, they visit the area once a month, in the northern area of the pier, so they will not be impacted by the Project.

3.2.1.7 Fishing Areas

Figure 3-8 illustrates the fishing zones closest to the Project, as observed in 2016. In addition, Figure 3-9 illustrates the port access and dock areas of the Port of Acajutla, which are considered restricted areas for fishing activities and are constantly monitored by the port authority and CEPA security team. Artisanal fishermen utilize these areas for fishing, especially the area known as "El Pedrero" as they commonly call the place near the craft pier. They also cross these area as part of their routes to other fishing areas on the open sea, towards the area of Metalío or more commonly in the direction towards Punta Remedios to the southeast.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

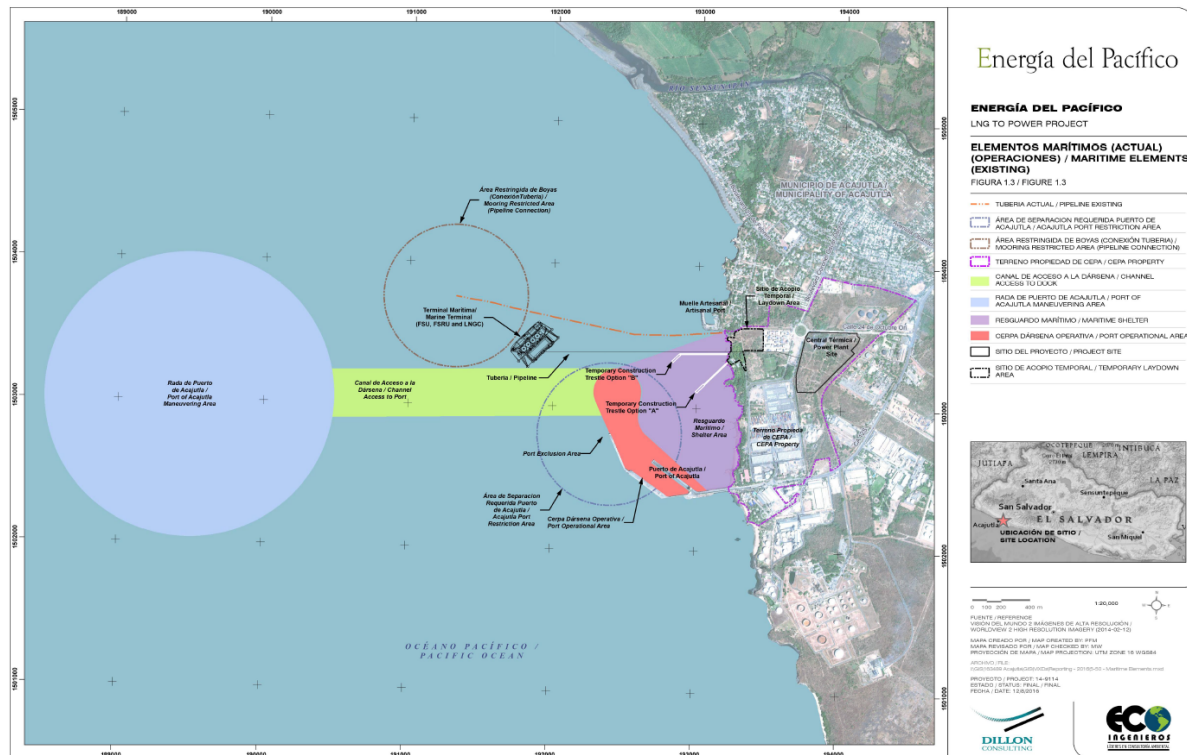
Figure 3-8: Fishing Areas near the Project.



Source: ECO Ingenieros & Dillon Consulting, EDP LNG to Power ESIA, December 2016

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

Figure 3-9: Port access and dock areas of the Port of Acajutla.



Source: ECO Ingenieros & Dillon Consulting, EDP LNG to Power ESIA, December 2016.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

4 Administrative Framework

4.1 NATIONAL REQUIREMENTS

This FMLRP simultaneously meets both national requirements and applicable international lender standards. The General Law on Management and Promotion of Fisheries and Aquaculture (Decree No. 637, dated December 6, 2001) regulates fishing activities to ensure the conservation and sustainable development of hydro-biological resources within national territories and jurisdictional waters, including marine waters and inland water bodies. The law designates the Ministry of Agriculture and Livestock (*Ministerio de Agricultura y Ganadería*, or MAG), as the authority responsible for implementing the law and its associated regulations.

The preparation of a Fisher Management and Livelihood Restoration Plan is not explicitly required by Salvadoran law. This plan, however, does respond to the international standards to identify, minimize, and compensate for all impacts on local assets, resources, and livelihoods.

4.2 INTERNATIONAL LENDER STANDARDS

In addition to complying with Salvadoran laws and regulations, EDP is committed to aligning with international lender standards, including the IFC Performance Standards. The Performance Standards most relevant to this plan are briefly described below.

4.2.1.1 PS 1: Assessment and Management of Environmental and Social Risks and Impacts

Performance Standard (PS) 1 describes how environmental and social issues are to be managed in project development and serves as the core around which the other standards are framed. Among other things, PS 1 requires that local communities be appropriately engaged on issues that could potentially affect them. Key requirements to this end include:

- Conducting an informed consultation and participation process with affected communities;
- Working in an inclusive and culturally appropriate manner;
- Addressing the needs of disadvantaged or vulnerable groups; and
- Making available an effective grievance management system.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

4.2.1.2 PS 5: Land Acquisition and Involuntary Resettlement

The assessment and management of project impacts on fish resources, fisheries, and fishing-based livelihoods are primarily covered by PS 5 (*Land Acquisition and Involuntary Resettlement*). PS 5 identifies project-related restrictions of access to and usage of natural resources as a trigger for application of the standard. More specifically:

“The Performance Standard applies to physical and/or economic displacement resulting from... (i) project situations where involuntary restrictions on land use and access to natural resources cause a community or groups within a community to lose access to resource usage where they have traditional or recognizable usage rights and (ii) restriction on access to land or use of other resources including communal resources such as marine and aquatic resources, timber and non-timber forest products, fresh water, medicinal, hunting and gathering grounds and grazing and cropping areas.”ⁱ

Furthermore, PS 5 stipulates that “where projects involve economic displacement only, the Client will develop a Livelihood Restoration Plan. For persons whose livelihoods are natural-resource based and where project-related restrictions on access apply, implementation of measures will be made to either allow continued access to affected resources or provide access to alternative resources with equivalent livelihood earning potential and accessibility. Where appropriate, benefits and compensation associated with natural resource usage may be collective in nature rather than directly oriented towards individuals or households.”ⁱⁱ

PS 5 recognizes the potential for projects to impact access to marine and aquatic resources and their use, and outlines the basis for mitigating such impacts. The assessment and management of project impacts on such resources and their use, however, is both complex and challenging. Consequently, in addition to PS 5, the IFC produces manuals and guidelines that provide deeper guidance on best practices on key subjects. Of particular relevance to this plan is the IFC’s *Handbook Addressing Project Impacts on Fishing-Based Livelihoods (2015)*. This handbook was developed to provide guidance for assessing and managing project impacts on fish resources, fisheries, and fishing-based livelihoods, and specifically to address the assessment and management of physical and/or economic displacement of small-scale subsistence and artisanal fishermen. The handbook has been used to guide preparation of this FLRP.

ⁱ IFC, Performance Standard 5.

ⁱⁱ *idem*

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

5 Principles

Since the Project will result in economic but not physical displacement, the mitigation measures to be adopted by the Project need only to constitute livelihood restoration.

As outlined in *Section 1.4*, the Project's approach to livelihood restoration complies with applicable national legislation and aligns with the IFC Performance Standards. In addition, the Project will treat economic displacement as an opportunity for sustainable community development, through which the livelihoods and quality of life of those displaced are measurably improved.

This FMLRP also incorporates the following guiding principles for livelihood restoration.

Minimize negative impact on livelihoods – The first objective of PS 5 is “To avoid, and when avoidance is not possible, minimize displacement by exploring alternative project designs.”

Identify livelihood impacts systematically – Livelihood impacts on local people will be determined systematically through on-the-ground studies, including detailed surveys and consultations. To the extent possible, such impacts will be quantified and the affected people identified individually. However, impacts that affect an unnamed set of people will also be documented. Impacts are considered even if the affected people are not resident in the area, do not own boats, or do not have legal title or access to the resources. Specifically, impacts on unlicensed artisanal fishermen will be taken into account.

Plan and negotiate mitigation measures with affected people – The planning of livelihood mitigation is not a purely technical exercise, but requires a high level of interaction with the affected people, in order to develop the most feasible and desirable mitigation measures. It is important to also consider independent fishers who fish for their own consumption rather than for sale, and therefore specify how the identification process and engagement will take place. The agreed mitigation measures, being a form of compensation, will be incorporated into formal collective and/or individual agreements. To the extent possible, the agreed mitigation measures will be described and quantified in these agreements, so the affected people may evaluate what they are getting as compared to what they are giving up.

Livelihood restoration is individual – The goal is that no person will suffer a livelihood loss due to the Project. Thus, mitigation measures will be planned to take account of each individual situation, and not aggregate measures of economic benefits. Individuals within an affected household, for example women and men, will be given consideration in determining livelihood entitlements, to the extent they are affected.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

Plan to over-compensate – To the extent that the quantitative impacts may not be fully known, and the effectiveness of mitigation measures is not guaranteed, the prudent approach is to plan for a margin of safety in compensation measures. This will help to ensure that the minimum requirement of no negative impact on livelihoods will be met.

Give preference to replacement of existing livelihood activities – Subject to consultations with the affected people, livelihood mitigation measures will be planned according to the following hierarchy of preference:

Category 1: Restoration of existing livelihoods. Generally, the lowest-risk option will be to re-establish the existing livelihoods of the affected people, so that they can continue doing what they know best and what is known to work in the local situation. While the opportunity may be taken to introduce proven enhancements to the existing livelihoods, the emphasis should be on replacing the livelihood assets with new assets of at least equal quality. In this case there is little risk of failure due to technical, economic or social factors. Even if for any reason the affected people choose not to continue their previous activities, it can still be shown that they were provided with all the means to do so.

Category 2: Intensification of existing livelihoods. For land-based livelihoods (*irrelevant for this Project*), in the event that there is insufficient available replacement land of at least equal quality, in many cases a viable option is to bring about a permanent, sustainable intensification of land use, so that a smaller area of land can be made to produce as much or more than the original land base, without requiring additional labour or other costs on an on-going basis. Sustainable intensification of non-land-based livelihoods may also be possible (*relevant for this Project*). Since any technical intervention is not guaranteed of success in a particular situation, care will be taken to identify interventions for which there are successful precedents under very similar conditions to and having the fewest identifiable risk factors. Consultation, along with experimentation through pilot programmes, will improve the chances of success.

Category 3: Introduction of alternative livelihoods. In terms of livelihood replacement, the substitution of a new type of livelihood (e.g., a micro-enterprise) for an existing one (e.g., fishing cooperative) should only be considered when there is no feasible way of restoring the existing means of livelihood. In the Project's situation, artisanal fishing may in some cases represent an activity that cannot feasibly be replaced in its current form. Objectively, developing new livelihoods carries much more risk of failure than restoring existing livelihoods, or intensifying existing livelihoods. For existing livelihoods, usually the factors needed to maintain those livelihoods can be identified with some confidence. However, for new livelihoods, even with the best planning, it may not be possible to ensure that all the technical, economic, human and intangible factors are in place for the new activities to be successful and self-sustaining. If the introduction of a new livelihood activity is only partially successful, then the goal of restoring

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

livelihoods of all affected people may not be met. In many cases, the promotion of alternative livelihoods may be more appropriate under community development programs, which are not intended to mitigate specific economic losses for specific individuals.

Implement pilot activities where possible – Livelihoods, as assessed at any given point in time, represent intricate systems, honed over long periods of time – often generations. They evolve and adapt to particular environmental, socio-economic, and cultural circumstances. Displacement of livelihoods may have complex, unpredictable, often immeasurable effects. As such, even lower-risk livelihood interventions are not guaranteed to succeed. Whenever time permits, interventions that are new to the area will be tested through pilot or demonstration activities. This will enable any potential issues (technical or human) to be identified before full-scale implementation. Demonstrations can also help the affected people to make more informed choices of alternative activities.

Maintain intervention until success is demonstrated – Some livelihood restoration measures will take years to become fully effective, depending on the challenges encountered. Livelihood interventions will be maintained for as long as necessary to demonstrate that the goal has been fully achieved. During the period when any new sources of livelihood are not fully operational, affected people will be entitled to some form of interim compensation, for example for lost income or food supply.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

6 Potential Impacts and Project Responses

6.1 POTENTIAL IMPACTS DURING THE CONSTRUCTION PHASE

Potential Impacts on Boat-Based Fishermen While boat-based fishermen reported to EDP fishing in the Project area, which includes an area known as "El Pedrero," observations made as part of baseline studies for the LNG to Power ESIA indicate that little or no fishing activities take place in this area by cooperative members. As a result, the Project does not expect to have a significant impact on fishing activities by boat-based fishers. During marine construction, a boating restriction area will extend from the FSRU to the coastal area where the temporary trestle will be located. This will prevent fishing in the nearby coastal area by Tuberós. The physical presence of the mobile vessel and FSRU will require fishermen to take a longer route when sailing from or to the south. This route would add more time for each trip and additional fuel.

Under the Project's initial design, the route of the pipeline was to be located within the restricted area of CEPA vessels. Although there would be no facilities to physically restrict navigation, it was assumed that fishermen should not be near the pipeline since it is within the CEPA restricted area. As such, the installation of the pipeline via Micro tunneling and its subsequent operation was not expected to have any impact on legal fishing activity. The FSRU will have a restricted navigation area of 500 m around the FSRU. The exception is to the south, where traffic of maritime vessels related to CEPA will be permitted to cross the entrance channel to the port within 300 m of the FSRU. Due to the restricted navigation area around the FSRU, fishermen wishing to travel south will need to travel a greater distance, which will require more time and consume more fuel as described in the EDP LNG to Power ESIA. EDP is aware that these assumptions regarding the restricted areas might not be respected by all fishers, especially when illegal fishing takes place, therefore EDP is committed to disseminate and clearly communicate health and safety measures for all existing fishers through posters and flyers placed in common areas (such as at docks, at the community relations office, and other common spaces in the community), near the Project area, and through the regular meetings with fishermen.

As presented in Section 3 about the Project Background, the initial Maritime Terminal design has been replaced with a Floating Storage and Regasification Unit (FSRU) held in place by means of Restricted Catenary Mooring (RCM). The FSRU will be located approximately 1,400 m from the coast in Acajutla, where the depth of water is approximately 17 m. The natural gas will be transported from the FSRU to the Power Plant via a 24" diameter pipeline installed with Micro tunneling. The FSRU will be a permanently anchored boat (the *Gallina*). The Project will also utilize a mobile boat that will unload LNG for a maximum of three days, after which it will leave. It is estimated that this boat will come to Acajutla approximately three times per year. The FSRU (*Gallina*) will be used for storage and regasification. The pipeline is designed to be underwater and underground, and it will therefore be unseen once installed. Consequently, it is worth noting that additional mitigation or compensation measures have not been proposed as a result of changes in the Project design because the impacts are minor and the government authorities have not asked for further compensation measures.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

Fishermen heading west or north along the coast will not be affected by the restricted area around the FSRU. It is not known how many of fishermen usually head south to fish and the importance of fishing sites to the south for their total catch. Despite the relatively short additional travel distance that would have to be traveled, the additional distance would increase fuel costs. Given the reduced income and marginal performance of fishermen in the region, this could have a significant impact. During the consultations held as part of the EDP LNG to Power ESIA in 2016, the ACOOPAC cooperative suggested a number of projects that EDP could finance or implement that would compensate its members. In addition, two meetings were held in October and November 2017. During the meeting held on October 20, 2017, the Project presented to the fishermen the possible design of the marine terminal which contemplated the passage of the pipe through the main access to the craft dock (however, this option was finally not adopted). In addition, during this meeting EDP asked the fishermen for their authorization to be able to go through the pier. EDP offered them to present their needs by letter to evaluate if EDP could support them. As a result the fishermen submitted their needs by letter. These meetings were held individually with each cooperative (ACOOPAC and ACPETAMAR) and then EDP visited their facilities.

In terms of marine habitats, the pipeline corridor traverses different marine habitats. Near the beach there are rocky areas with sensitive species such as "sea cucumbers" (*Filo echinodermata*) and lobsters. The lobsters are harvested by local fishermen. The rest of the corridor is a combination of silt, clay, and sand, without the presence of sensitive or unique species. No soft corals were identified within the pipeline route. The use of Micro tunneling to install the pipeline in the nearby coastal area will greatly reduce direct impacts on marine habitats. When marine sea bed excavation occurs, the excavated sediment is composed of sand/silt, so it is not considered a significant or sensitive habitat. As such, the direct loss of habitat will be minimal. Once the pipe is installed and the trench is filled, the conditions of the seabed will be restored equal or very close to pre-construction conditions.

In summary, construction activities and the presence of the FSRU could generate the following impacts:

- During the marine construction, a boating restriction area of approximately 500 m will extend from the FSRU to the coastal area where the temporary trestle will be located, therefore there will be a temporary loss of fishing areas located near the coast and could interfere with artisanal fishing activities, both cooperative as well as independent. The distance from the coast to the restriction area will be 1.7km. Oyster and "tubero" fishermen will be particularly affected as they fish in areas near the coast.
- The physical presence of the mobile vessel and FSRU will require fishermen to travel longer distances (approx. 2 more miles) and thus increased use of fuel for fishermen with boats travelling south from the pier to fishing zones located near Punta Remedios.

After a number of studies and discussions in meetings with stakeholders and authorities, the following compensation measures have been developed to mitigate the Project's impacts on fishermen. The measures to be financed by EDP are listed below.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

1. **Winch Replacement.** One of the two winches at the artisanal dock used by members of the several cooperatives is dysfunctional and EDP will install a new one to compensate the members of the cooperatives affected by an increase in the distance of their journey.
2. **FAD Installation.** EDP will install fish aggregating devices (FADs) near the artisanal jetty. A FAD is an object used to attract oceanic pelagic fish. They are usually composed of buoys or floats tied to the bottom of the ocean with concrete blocks. More than 300 species of fish gather around an FDA.
3. **Artificial Reef Installation.** EDP will install artificial reefs to rehabilitate marine coastal ecosystems. Artificial reefs are an efficient means to provide habitat to oysters and a variety of other marine species. The implementation of an artificial reef will promote the order and sustainability of marine resources and will be directed to affected communities, which should commit themselves to proper maintenance of the reefs.
4. **Canoes/Training for Independent Fishermen.** EDP will offer independent fishermen a *cayuco* (small canoe) or to receive training to change jobs. They have showed interest in the training and working for the Project. EDP has already included their resumes in the Project's database.

EDP identified these activities as actions that can effectively compensate for the effects of the Project. These measures were considered fair, as all fishermen will benefit equally, and they can be effectively implemented before the start of construction.

There has been debate around the costs and benefits of the winch, as ACOOPAC cleans it and charges for that service as well as operational costs (e.g., lubricant). This is creating discontent among the fishermen as they perceive that ACOOPAC is profiting from the winch because it is placed in their area. EDP has committed to replace the winch, however the cooperatives and fishermen must reach an agreement in order to organize the maintenance and work around the winch. EDP affirms that they want this winch to benefit everyone, and recognizes that if the fishermen do not organize themselves, this will create problems. EDP invited Fisheries and Aquaculture Development Center (CENDEPESCA) to a meeting in November to act as the regulating authority in order for EDP to stay neutral in front of the fishermen and organize the winch management. One option discussed during this meeting to resolve the conflict is for the winch to be installed on CENDEPESCA rather than ACOOPAC property.

Potential Impacts on Lobster Fishermen and Tuberos

The development of the Project will result in a loss of fishing grounds for groups of independent fishermen, specifically those who collect oysters and *tuberos*. During construction, fishermen will be restricted from using waters near the temporary trestle and the open waters between the trestle and the FSRU where the marine pipeline will be installed.

The area with the greatest impact is where lobsters are collected. The restriction in this area is expected to last up to 33 months. It should be noted that there will still be other local fishing areas near the coast available for the tuberos during construction, although available areas will be reduced. Offsets for these impacts include the installation of fish aggregating devices (FADs) or other structures that attract fish to be located north of the artisanal dock. In addition, an artificial

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

reef will be constructed in the nearby area to attract oysters. Combined, these measures will benefit the fishers as they will not need to travel so far in order to fish.

To further compensate both oyster fishermen and tuberos, EDP will provide them with an option to receive support and training to remain in fishing, or to make a switch to an alternative form of livelihood. These options have been consulted with fishermen. For example, on September, 23 2019, EDP met with independent fishermen to discuss which trainings they would like to take as an alternative line of work. EDP is collaborating with different companies and institutions that can support with the training efforts. EDP plans to start the Training Plan implementation before the marine terminal construction begins. The support will consist of the following.

1. If they decide to remain in the fishing sector:
 - a. Participate in the construction of a rowboat to replace the "tubes";
 - b. Receive training including safety, marketing of fish, and food safety; and
 - c. Receive better fishing equipment.
2. If they decide to leave the fishing sector:
 - a. Receive support for training in an alternative line of work / employment skills, such as automotive mechanics, boat motor repair, electricity, occupational health and safety, and information technology (computing); and
 - b. Be eligible for ongoing guidance to find a job.

It is expected that these options will provide opportunities for affected fishermen to improve their livelihoods. Skills development programs will be carried out through a third party (possibly an NGO), which will be selected by EDP. If the above options are not suitable for an individual, alternative compensation will be explored on a case-by-case basis.

6.2 POTENTIAL IMPACTS OF THE OPERATIONS PHASE

During operations, the main effects on fishermen will be the additional distance they will need to travel around the FSRU exclusion area to fishing areas, as described above. The mitigation measures identified for boaters (members of cooperatives) and fishermen without vessels or independent fishermen (oyster fishermen and tuberos) will effectively compensate the affected parties.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

7 Consultation

The stakeholder engagement undertaken during the EDP LNG to Power ESIA process in 2016 included a public information center in Acajutla, establishing a Project webpage, and targeted stakeholder meetings and focus group workshops including local fishers. Local fishers that belonged to different groups (independent fishermen, cooperatives, etc.) were identified during the consultation process that was carried out for the ESIA. They were invited to two public meetings that took place to present the results of the draft ESIA.

As an example, in a presentation at Acajutla City Hall in 2016, the following concerns and suggestions related to the fishing sector were registered:

- Measures to be implemented to resolve the problems faced by the fishermen not being able to fish in certain areas (e.g., the FSRU exclusion zone);
- Holding briefings with all fishermen, not only with cooperative representatives, in order to explain to them the conditions under which the Project will be carried out and the measures to be taken to mitigate impacts to them;
- Explanation to fishermen about social investment projects to be implemented by EDP and the compensation measures to be implemented as part of their ESIA commitments;
- Training for fishermen on the various compensation measures to be implemented by EDP for the fishing sector;
- Presence of the Social Investment Fund for Local Development (FISDL) and City Hall during meetings with fishermen, with the objective of facilitating coordination among these groups (suggested by the city hall alderman);
- Importance of working jointly with the public institutions involved in the social investment fund as the procedures with FISDL and the City Hall Council can be very bureaucratic and complex; and
- Involvement of the Environmental Unit in the Mayor's office in following up on each of the projects that will be carried out (suggested by the City Council).

Since the EDP LNG to Power ESIA in 2016, several meetings have been held with fishermen in order to discuss their concerns regarding Project impacts. In October 2017, a meeting was organized with the dredging team and in December 2017 with the Independent Environmental and Social Consultant (RINA) of the Project's potential lenders. In October 20 and October 24, 2018, two other meetings were organized that included fishermen. The meeting on October 20 included the participation of ACOOPAC, the cooperative based at the artisanal dock, during which they expressed their interest in the winch replacement (Appendix 1). As mentioned above, however, the rest of fishermen showed discontent as they believe they will not benefit from the winch as much as ACOOPAC.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

Other results of these meetings include EDP's commitment to install artificial reefs and their proposed location near the pier. In addition and as mentioned above, independent fishermen were offered two options, either participating in the construction of a wooden boat or receiving training to change jobs. Out of all the fishermen groups, they showed the highest interest in training and asked for employment opportunities during the construction of the Power Plant.

For the next steps and phases of the Project, EDP plans to continue the consultation and engagement process with stakeholders, which includes fishermen and their representatives. EDP will carry out regular meetings with fishermen to explain and raise awareness about the livelihood restoration measures (for more details on these measures, see *Section 10.2*). EDP will also include capacity building measures so that fishers are fully informed and capable to advocate for the annual social investment project opportunities. EDP will monitor the progress and implementation of the livelihood restoration measures and the fishermen's views towards the Project and this plan. In addition, if complaints arise from these stakeholders, EDP will directly meet with them to resolve their requests or complaints.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

8 Assessment of Fishing Activities and Affected People

Despite the Project's efforts to avoid, minimize, or mitigate the Project's impacts on the local fishing community as seen on EDP LNG to Power ESIA in 2016, a baseline assessment update of fisheries and fishing-based livelihoods will be carried out by EDP to develop a more comprehensive understanding of: the current affected population's fishing, processing, distribution, and marketing of fish; the productivity of these activities; and their contribution to livelihoods. This information is necessary to:

- Develop a comprehensive understanding of the Project's pre-construction situation;
- Understand and quantify the Project's potential impacts on fishing and associated activities and fishing-based livelihoods;
- Identify affected people and the Project's impacts on their activities; and
- Design and implement appropriate avoidance, minimization, and/or alternative mitigation and/or compensation strategies.

Based on the Project boundary and scope and the baseline work, various attributes of household and community livelihoods, including the household's fishing activities, food security, nutrition, health, income, and alternative livelihood activities, will be included in the assessment.

8.1 CENSUS UPDATE

The available data from 2016 will be updated to understand the current situation of the fishing sector in the Project's AOI. EDP will review, update, and validate their existing census as certain cooperatives, have not renewed their cooperative registration lists. A verification process will be conducted by EDP in order to update and confirm the census, which identifies how many fishermen fish in the area adjacent to the Project.

In order to carry out this census, the following approaches recommended by the IFC's Practice Handbook "Addressing Project Impacts on Fishing-Based Livelihoods" will be followed.

- Request cooperative registration lists in order to review and verify the amount of fishermen per cooperative to update the census.
- Identify and consult with fishermen associations, fishing cooperatives, or other organizations that may maintain records of active fishermen. This will be useful in order to confirm the number of independent fishermen such as Tuberos, as they are not registered in official lists as fishermen that belong to cooperatives.
- Reach out for support and collaboration with local authorities. EDP will meet with CENDEPESCA in order to sign an agreement and collaborate with them to obtain

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

information and their support regarding the fishing sector and EDP's commitments with fishermen in the AOI.

- Despite the male predominance in the sector, ensure that women's opinions and inputs are taken into account.
- Engage in proactive consultation with affected communities to determine acceptable approaches through which to: (i) identify fishing activities and fishermen; and (ii) categorize individual and household participation in fishing activities.

In addition, EDP will collect information such as:

- Whether each fisherman is a boat owner or crew;
- Whether each fisherman is associated with a fishing cooperative and, if so, which one;
- Challenges and constraints; and
- Involvement of other family members in fishing, catch processing, or marketing.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

9 Eligibility

This section describes the principles and policies that the Project will use to determine eligibility and define entitlements, in keeping with its understanding of impacts and preliminary proposals for livelihood restoration and improvement as described above.

9.1 ELIGIBILITY POLICIES

Eligibility policies define who and what is eligible for compensation, and conversely who and what is not. “Who” refers to those persons, households, or communities that experience displacement impacts. “What” refers to the types of immoveable assets that will be displaced.

It is important to note that there will not be a new “cut-off date” for the census update purposes of determining final eligibility and entitlements of fishermen who belong to cooperatives. The update will be carried out by EDP through consultation and public available information to confirm who is no longer registered in the cooperative fishermen lists.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

10 Managing Impacts

Impacts on fishing-based livelihoods almost always involve economic displacement, and less frequently include physical displacement as well. Management measures to mitigate these impacts should focus on the restoration and development of fishing activities of project-affected households, fishermen groups, and/or communities, and also consideration of interventions related to improving opportunities for other non-fishing livelihood activities and sustainability of the fisheries system.

EDP is aware that construction activities will cause some inconvenience to boat traffic near the FSRU and the pipeline during construction. There will not be a permanent loss of access, however fishermen will have to use more time and fuel to access some of their fishing areas. EDP is committed to mitigate impacts to the fishing sector by minimizing the Project footprint, working in close consultation with communities, rehabilitating or restoring disturbed resources, and providing communities with access to training and technical assistance.

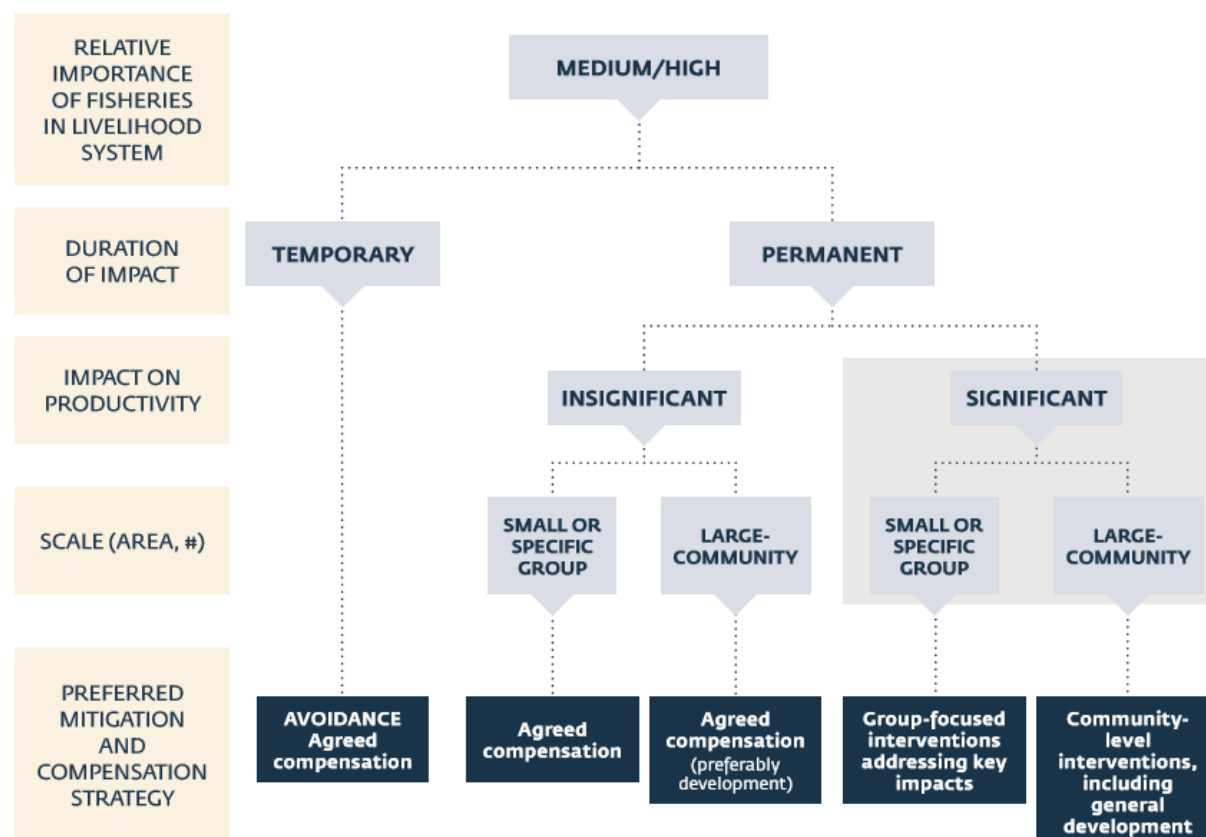
In addition, the Project plans to manage other impacts related to fishing activities, such as risks to safety and security and behavioral changes among local populations. For example, if security personnel is hired to operate at the FSRU and supervise the area surrounding the underground pipeline, the Project will engage affected communities to ensure an awareness and understanding of the need for Project security. Likewise, and specifically for this Project, the current population's behavior and expectations should be closely taken into account as there is a negative local history between other local companies and the fishing sector, which has instigated distrust against the Project based on past experiences. According to the IFC's good practice handbook on Fishing-Based Livelihoods, the issue of behavioral change needs to be addressed through early stakeholder engagement and development of community agreements where behavior is tied to benefit streams.

10.1 COMPENSATION AND PROJECT PROPOSED LIVELIHOOD RESTORATION MEASURES AND MANAGEMENT PROGRAMS

As depicted in Figure 10-1, the IFC proposes a decision tree diagram to address the nature of socioeconomic impacts on fish resources, fishing, and fishing-based livelihoods in order to decide the preferred mitigation and compensation strategy.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

Figure 10-1: IFC Decision Tree Addressing the Nature of Socioeconomic Impacts on Fish Resources, Fishing, and Fishing-Based Livelihoods.



Source: IFC, *Addressing Project Impacts on Fishing-Based Livelihoods*, 2015

In addition, if Project-sponsored fishery development programs are implemented, these should be particularly cognizant of the following.

- It is important to ensure that all affected communities are aware of and understand the difference between what the Project is obligated to do to mitigate impacts and what it voluntarily chooses to support.
- Special considerations will be given to groups that are disproportionately affected by the Project, such as women and vulnerable groups.
- At the earliest stage of development of these programs, scoping meetings involving appropriate representatives of federal, provincial, and local governments

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

should take place, so that all levels are in consensus as to the goals and objectives and their respective roles and responsibilities. This will avoid inefficiencies with potentially competing programs by these entities.

- Development programs should be based on a systems analysis of the fish resources and fisheries within the Project area of influence, leading to the identification of priority areas (e.g., through strength/weakness/opportunity/threat (SWOT) analysis, needs analysis). Through this process, the Project should define objectives, boundaries, target groups, and component programs.
- Regarding objectives, the program may include initiatives to address: (i) fundamental constraints to the development and operation of fishing-based livelihood systems; (ii) identified needs of fishing-based communities; and/or (iii) threats to the sustainability of such systems. Interventions should be subject to screening processes. Written objectives should be quantified with specific temporal end points or products.

10.2 PRELIMINARY PROPOSED LIVELIHOOD RESTORATION MEASURES

These preliminary compensation measures were defined with a group of fishers from the area of influence through a consultation process that was carried out as part of the ESIA. The ESIA includes the methodologies used to carry out the consultation process. EDP held meetings with independent cooperatives and fishers, where they discussed the compensation measures in order to prepare the implementation of the compensation measures before the start of construction (planned in March 2020). EDP has records and evidence from this consultation and participation process, which include photographic evidence, attendance lists, and meeting minutes. The results of these meetings have served EDP to update the census and improve the compensation measures.

In addition, EDP has recently received offers from local consulting companies that will support them with the execution of these measures. They are planning to choose one local consulting firm in the coming months to perform this work and as soon as the work plan is available and the consultants are selected they will share the information with the independent fishers and cooperatives. At this point in time, once the work plan is clear to fulfill the livelihood restoration and improvement measures, EDP will issue an official agreement or acceptance act between the fishers and EDP.

The preliminary livelihood restoration measure are listed below:

1. **Winch Replacement.** One of the two winches at the artisanal dock used by fishermen in the AOI is dysfunctional and EDP plans to install a new one.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

2. **FAD Installation.** EDP will install 15 fish aggregating devices (FADs) near the artisanal jetty. A FAD is an object used to attract oceanic pelagic fish. They are usually composed of buoys or floats tied to the bottom of the ocean with concrete blocks. More than 300 species of fish can gather around an FDA.
3. **Installing artificial reefs.** EDP will install artificial reefs, which attract oysters and other fish resources, to compensate Oyster catchers.
4. **Boat Construction/Training.** EDP will compensate 57 independent fishermen known as “Tuberos” and “Oyster-catchers” by giving them the option to either participate in the construction of a boat and receiving safety training (product handling) and reception of basic fishing equipment, or to receive training in an alternative line of work with the objective of leaving the fishing industry.
5. **Licensed Fee Support.** Many fishermen are not licensed fishermen and only licensed fishermen would be able to use the winch if it was built on CENDEPESCA's property. Therefore, a potential compensation measure would be established to help these unlicensed fishermen to get licensed, including paying the fee.

In order to manage these programs, EDP will collaborate with CENDEPESCA, the fishing authority in the AOI, in order to manage the organization of the winch and control of the fishing areas around the FADs and artificial reefs. This will avoid conflicts and issues among the fishermen as they have already shown discontent regarding the management of the winch. EDP is committed to make sure that the Project's mitigation measures and programs benefit all affected fishermen, including independent fishermen and those from cooperatives.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

11 Grievance Mechanism

In accordance with the IFC Performance Standards, an external grievance mechanism for the Project will be implemented as stated in EDP's Stakeholder Engagement Plan (SEP) and External Grievance Mechanism directive (EDP-ESMS-DIR-012). This grievance mechanism will allow stakeholders to lodge grievances and complaints and ask questions to the Project and requires the Project to respond to them in a transparent, constructive, timely, confidential (if desired), culturally appropriate, and accessible manner.

As described in the SEP, this mechanism is comprised of nine steps: 1) receive and register grievances; 2) screen and assess; 3) management of non-admissible claims; 4) management of admissible claims; 5) approach and communication decisions for low and medium priority claims; 6) procedure for high priority claims; 7) challenging decisions; 8) tracking; and 9) documentation. Information on the grievance mechanism will be shared during all formal consultation fora, and EDP will produce a written flyer on how to access and the steps in the grievance mechanism.

As of October 2018, only one claim has been received from a fisherman. The complaint regarding a damaged winch was submitted on August 27, 2018. EDP responded to this claim by letter on September 7, 2018, and the fisherman was invited to a meeting at EDP's office in Acajutla. The meeting took place on September 17, and he was informed that the damaged winch was going to be replaced by EDP.

A flyer (Figure 11-1) has been developed for the disclosure of the grievance mechanism and was delivered and explained during a public consultation meeting on October 24, 2018, and during consultations regarding the Transmission Line component of the Project that took place on October 29, and October 31, 2018 in Ahuachapán and Sonsonate. In addition, EDP has also explained the GM during meetings with fishers and has distributed printed copies of the flyers. EDP also plans to place posters with the GM information in visible and accessible places that are used by fishers, such as at piers.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

Figure 11-1: Grievance Mechanism Flyer.



Source: EDP, 2018

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

12 Timeline and Responsibilities

12.1 TIMELINE

The update and verification of the census and impact assessment will be completed before the Project's construction phase begins. The final mitigation or compensation measures will be decided after the census and impact assessment are completed in coordination with relevant stakeholders. Development and management programs, if any, will take place throughout the life of the Project.

12.2 ACTION PLAN

The table below presents the action roadmap for the main activities that result from this plan. The table also specifies the phase of the Project, who is responsible, and timing for them to happen.

Table 12-1: Action Plan of Main FMLRP Activities.

Main Activities	Phase of the Project	Person or Team in charge	Frequency or Deadline	Comments and updates as of October 2019
Fishing census verification and update	Before construction starts	Community Relations Coordinator	Before construction	The Census update is in progress. EDP is waiting for CENDEPESCA's confirmation that it has agreed to verify its own database and share it with EDP.
Completion of analysis of vulnerable groups in the AOI	Before construction starts	Community Relations Coordinator	Before construction	The EsIA includes the identification of social actors that was carried out, and included the fishers.
Impact assessment completion for the fishing sector and	Before construction starts	Community Relations Coordinator	Before construction	The impact identification is detailed in Appendix 10C of

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan		
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0	

identified vulnerable groups				the EsIA: Compensation Projects.
Memorandum of Understanding with the Fishing Sector (including all types of fishermen)	Before construction starts	Community Relations Coordinator	Before construction	The agreement has not been signed yet.
Agreement with CENDEPESCA	Before construction starts	Community Relations Coordinator	By February 2019	CENDEPESCA has changed its Director, therefore the next step for EDP is to meet with CENDEPESCA and present the compensation projects to reach an agreement.
Mitigation and Compensation Strategy for the fishing sector	Before construction starts	Community Relations Coordinator	After the Census and Impact Assessment are updated	A consulting firm will be hired to execute and monitor the mitigation and compensation strategy measures for the fishing sector.

Source: EDP, 2018

12.3 RESPONSIBILITIES

EDP has the ultimate responsibility to comply with the goals and commitments established in this FMLRP. EDP personnel and contractors will be responsible for carrying out the work in a manner that complies with the expectations established in this FMLRP during the different phases of the Project.

The Project's Community Relations Coordinator, together with the ESHS Manager, will be responsible for developing, working on, and implementing the Project's FMLRP, and they will also ensure the dissemination of the FMLRP among the Project's personnel and among external stakeholders, to reach agreement with stakeholders, such as CENDEPESCA and the municipal authorities. As shown on the Action Plan above, EDP plans to do so by carrying out different meetings with these institutions to reach an agreement regarding their collaboration and roles. The Community Relations Coordinator will continue to communicate with fishers in the area of influence to collaborate in the implementation of the Plan and especially regarding the livelihood restoration measures.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

13 Monitoring and Ongoing Improvement

13.1 MONITORING

The purpose of monitoring and evaluating the FMLRP is to record the degree to which mitigation and management measures achieve their intended objectives of minimizing the negative impacts associated with the construction, operation, and decommissioning phases of the Project, as well as how livelihoods of fishermen are restored to pre-project conditions, such as through the livelihood restoration measures. Depending on the nature of the mitigation, this may consist of documenting whether the prescribed actions for each measure have been carried out, what the outcome was, or both. Monitoring and evaluation activities will be performed both by EDP and by independent third parties as relevant in each case. EDP will also carry out participatory monitoring by involving fishers in the discussions and monitoring process. Table 13-1 outlines the monitoring activities that will be undertaken as part of this management plan.

Table 13-1: Monitoring Activities and Key Performance Indicators (KPI) Plan.

Topic/ Aspect	Method	KPI	Frequency
Census and Impact Management	EDP will supervise the team in charge of the census update and will review the verification process. The Project will include local stakeholder participation in this process and will provide reporting back to the community on the development of the census.	100% completed census and adjustment of impact assessment and management	Weekly (until its completion)
Fishing Community Participation, Engagement and Monitoring Activities	EDP's Community Relations Team will record formal and informal engagement and community investments with the fishing sector and summarize the engagements in quarterly engagement reports as part of the SEP. EDP will also report evidence of participatory monitoring with fishers involved.	At least one meeting with fisher representatives from different groups and types of fishing every two months. Evidence (e.g., photographic, attendance list, minutes) of	Quarterly

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

		participatory monitoring.	
Community Attitudes	Attitude and perception surveys will be carried out to monitor the fishing community's sentiment and concerns related to the Project.	At least 50 completed surveys per year.	Yearly
Management and Development Programs	When the management and development programs are put in place, EDP will monitor and document the management and development programs. This will be reported on the community engagement performance report.	<p>The report will include:</p> <ul style="list-style-type: none"> - The number of programs in place; - The activities and number of people that will benefit from them, - Staff in charge of the programs; and - Tangible results that will be established when the program plans are finalized. <p>The report will include 100% of the programs.</p>	Quarterly
Agreement with CENDEPESCA	EDP's Community Relations Team will produce minutes for meetings with CENDEPESCA and inform EDP once an agreement has been signed.	Copy of the signed agreement with CENDEPESCA.	By November 2019
Livelihood Restoration Measures	<ol style="list-style-type: none"> 1. Winch replacement. 2. FAD installation. 3. Installing artificial reefs. 4. Boat construction/ training. 5. Licensed fee support. 	<p>Evidence that the winch has been replaced.</p> <p>Installation of 15 fish aggregating devices (FADs) near the artisanal jetty.</p> <p>Installation of artificial reef.</p>	Quarterly updates until completed.

Energía del Pacífico	Fisher Management and Livelihood Restoration Plan	
Date: 01/20/2020	Ref: EDP-ESMS-PLN-005	Rev. 0

		57 boat construction or trainings completed. Number of fishermen that were helped to get licensed and paying fee.	
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Source: EDP 2018

13.2 ONGOING IMPROVEMENT

To ensure continuous improvement of the FLRP, the Project is committed to evaluate, review, and improve the actions, progress, achievements, and challenges of the objectives and practices described in this document. In order to ensure that the activities are progressing as planned, continuous monitoring will be done to identify any unusual crisis or occurrence. Modifications will be made when necessary. In addition, performance reviews will be made periodically to determine the progress of the FLRP and, when necessary, it will be improved. Consequently, areas that could need changes will be identified and fishing sector stakeholder opinions will be taken into consideration throughout the process.

In addition to monitoring and performance reviews, the Project will keep abreast of possible changes or expectations, including legal or regulatory developments, that affect the activities and groups related to the FLRP, as well as any opportunity to further the aims of the FLRP.