eni timor leste



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Mr. Cristovão da Costa P. Martins Chief EIA Department Direcção Nacional do Meio Ambiente Rua Dom Aleixo Corte Real Mandarin, Dili

20 September 2010

RE: RESPONSE TO COMMENTS AND FINALISATION OF COVA EIS AND EMP

Dear Mr Martins,

Thank you for providing to us the comments received from stakeholder review of the Cova-1 Exploration Drilling Environmental Impact Statement (EIS) and Environmental Management Plan and Monitoring Program (EMP). Eni Timor Leste S.p.A. (Eni) has carefully reviewed the recommendations of each of the stakeholders and has prepared a table of our responses, which is provided in the following pages.

Amendments have been made to the EIS and EMP documents where appropriate. The revised EIS and EMP will be provided to DNMA later this week. It is our understanding that these documents only need to be provided to the DNMA for review, and not to other stakeholders.

Eni believes these documents provide for acceptable environmental management of the Cova-1 drilling program, and we look forward to confirmation of this from the DNMA. As you know, to enable timely mobilisation of the *Saipem 10000* drillship to Timor-Leste, it is critical that DNMA's confirmation is received by **Friday 1 October 2010**. Eni plans to commence drilling on 15 October 2010.

Following DNMA's approval of the EIS and as noted in the attached table, Eni will provide an Oil Spill Response Manual (OSRM) and an Incident Management Plan (IMP) to DNMA for information, before the commencement of drilling.

Please feel free to contact Tony Heynen or Jose Sabino in the Eni Dili office, or Rob Phillips, Senior Environmental Advisor (rob.phillips@eniaustralia.com.au) if you have any queries.

Yours truly,

Eni Timor Leste S.p.A.

Per:

Marina Biancone

EXPLORATION MANAGER

eni timor leste spa

Company with a sole partner

Registered office in San Donato Milanese (MI)
Via Emilia 1
Company Capital euro 8,983,555.00 i.v.
Business Register of Milan,
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Milan R.E.A. No. 1814390
Company subject to the management and coordination activity of eni spa

Eni response to stakeholder comments on Cova-1 Exploration Drilling EIS and EMP

	Comment	Stakeholder	Company Response	Actions for Eni
1	Background of the proposed project: Some parts of the background are described, however it has little information of the project related to the Timorese development process, justification for the project, etc.	DNMA	The objectives and economic development drivers for the project are described in EIS Section 3.1. More information can be added to describe Eni's contract with the T-L government, which contains commitments to conduct petroleum exploration activities within certain timeframes.	Add more information to EIS Section 3.1
2	Study area: No description on the schedule/duration/timing of the environmental study, direct/indirect affected area and so on.	DNMA	No field environmental study was conducted for the drilling program, as all the information required to make an assessment of the potential environmental effects was available from existing literature sources. EIS Section 4 does contain information on the effects of the winter and summer seasons on the environment around the Cova-1 location, including climate and oceanography. EIS Section 4 also contains information on environmentally sensitive areas that are distant from the Cova location, in the Timor Sea and broader region, which could be "indirectly" affected by major emissions from the project (e.g. accidental oil spills). Eni considers that the EIS contains sufficient information to meet this assessment requirement.	None.
3	Description of the environment: Generally it well performed, however in some parts there are no available references.	DNMA	A large number of references are already included within EIS Section 4 (and EMP Section 3), and are listed in EIS Section 7. These sections will be reviewed and reference sources clarified in the final EIS, where necessary.	Check EIS Section 4 (and EMP Section 3) for referencing, add references if required.
4	Analysis of alternatives to the proposed project: Describing the reason why any alternative has not been considered, instead mitigation measures were considered. In this stage, the exploration spot was identified, however, other ways for exploration giving less impacts than the proposed method should be considered for demonstrating which is the best way of all.	DNMA	There is no alternative to drilling to accurately assess the nature of a subsea petroleum reservoir. More detail will be added to EIS Section 3.2 to clarify this.	Clarify lack of alternatives to drilling in EIS section 3.2

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5	Public/NGO participation and inter-agency coordination: Difficult to identify what kind of concerns the stakeholders have because of no information in the report such as minutes, summary of comments and so on.	DNMA	A list of the issues raised by stakeholders during the consultation process will be added to EIS Section 1.5.	Add list of issues to EIS Section 1.5
6	Page 3 of EIS presents outcomes of a detailed EIA. Ask for copy of detailed EIA. Does the EIA address requirements of DNMA Guideline No. 7 especially data on Physical, Biological and Social Impacts of TLEA.	ANP	The EIS document represents the detailed EIA undertaken for the Cova drilling program, and was prepared in accordance with the Framework of Reference submitted to, and approved by, the DNMA under the environmental assessment legislation and guidelines. All risks, with the exceptions of accidental releases of hydrocarbons and chemicals, are ranked as low. The impact from drilling will be localised and restricted to drill cuttings being discharged in the near vicinity of the well. Drilling will only take about 30 days and the impact will therefore be short term. Eni has committed to using water based muds which are nontoxic and pose little or no risk to the environment. In accordance with this and other risks identified, sufficient detail on the physical, biological and social impacts has been included in the EIS.	None
7	Page 16 what is Eni ALARP standard as a company? Statement is very general in 1.3Eni has implemented safeguards to reduce the risk to as low as reasonably practicable.	ANP	Risks are considered to be As Low As Reasonably Practicable (ALARP) if they are ranked Low or Medium in the qualitative risk assessment conducted during the EIA process (see EIS Section 5.2 and EMP Section 4). This indicates that the level of residual risk is acceptable, as long as the relevant management strategies are being applied correctly. With the exception of accidental releases of hydrocarbons and chemicals, all residual risks of the Cova drilling program have been ranked Low.	None
8	Page 17 in EIS attach copy of TOR of 24/11/09 and DNMA advice of 21/12/09	ANP	It is not considered necessary to attach the Framework of Reference (FoR) document; the EIS is a stand-alone document.	None

	Comment	Stakeholder	Company Response	Actions for Eni
9	Page 25 give detail description of drilling activity and well control procedures, etc.	ANP	More information can be added into the EIS on drilling methods. However most of this detail will be in the application to drill, which is assessed by the ANP separately of the EIA process.	Additional information to be added to EIS Sections 2.4, 2.5, 2.12 and EMP Sections 2.4, 2.5, 2.12
10	Page 26 - ask for copy of Emergency Response Plan and OSCP. Does Eni TL have membership of oil spill response company	ANP	Eni is a shareholder and a Participant Member of Oil Spill Response Limited (OSRL), an industry-owned response organisation that can provide equipment and expertise in the event of a tier 3 oil spill, and can assist with clean-up activities. In the south-east Asian region, OSRL maintains an inventory of equipment in Singapore, which can be mobilised at any time (24 hours per day, 365 days per year). Equipment available includes dispersant application boom systems, skimmers, and surveillance and communications gear. Eni has prepared an Oil Spill Response Manual (OSRM) and an Incident Management Plan (IMP), which will be forwarded to DNMA. Eni understands that these documents are assessed separately of the EIA process.	Forward copy of OSRM and IMP to DNMA before the start of drilling
11	Page 38 more data on biological oceanography, any baseline data survey done in this block? How far is study of Heyward et. al 1997 from the Cova-1 well? Is it relevant due to the study?	ANP	Eni has not conducted baseline monitoring in the Cova-1 area, as the potential impacts of the exploration drilling program are considered localised and very short-term, posing no risk of environmental contamination. Eni undertook baseline monitoring in the Kitan Field, which is relevant to Cova due to its close proximity (around 50 km away), and the similar offshore deepwater environments at both sites. All parameters were below detection limit characteristic of a "greenfield" site, confirming a pristine environment. These results can be included in the Cova EIS. The Heyward study is considered relevant to Cova drilling as the Big Bank Shoals are the closest environmentally sensitive areas.	Add summary results from Kitan baseline monitoring program to EIS Section 4.1.2, 4.1.4, 4.2.6, 4.2.7, 4.2.8 and similar parts of EMP Section 3.

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12	Table 4.6 page 47. Does EPBC Protected matters database search cover this geography of Cova-1? Are all the Marine species in the table seen in TLEA and Cova-1?	ANP	In the absence of threatened species legislation for T-L, the EPBC database has been used as an indicator of the potential threatened and/or migratory species that use the Timor Sea. The database does cover the area of interest for Cova-1, but is course in scale and has not been the subject of detailed ground-truthing studies. However, it is considered relevant information on which to base management decisions for an exploration drilling program.	Explain in more detail relevance of EPBC database for Cova in EIS Section 4.2.12 and EMP Section 3.2.12.
13	Page 59 copy of high level risk assessment workshop conducted in January 2010 to be appended in EIS report.	ANP	The results from the risk assessment are contained in EMP Section 4.3.	None
14	Pages 63-75 on Hydrocarbon spill do not mention time spill will reach TL coastline. It is less than 100km from Cova-1 well. The details of model to be given in terms of time and for continuous flow of oil spill as in case of Montara and Horizon blow outs.	ANP	Oil spill modelling will be amended as Cova-1 drilling is now being undertaken in the summer season. Longer-term modelling (8 weeks) will be included to simulate a well blowout. In this season the prevailing winds are from the west and the T-L coastline is not under threat.	Amend oil spill modelling in EIS Section 5.4.3.
15	Page 82 details of mud handling system and OIW outlet as per SAIPEM 10000 is designed for what levels? The support vessel management is not covered in EIS / EMP. Give details?	ANP	Water based muds (WBMs) are to be used, with around 15% of the total volume discharged to the ocean in cuttings - these WBMs do not contain hydrocarbon contaminants. The EIS and EMP do cover environmental management for support vessels (see EIS Sections 2.7, 5.4.6 and 5.8.3; EMP Section 4.3). Text in the EMP will be amended to clarify that the environmental management strategies in Section 5 apply also to support vessels.	Additional information on WBM system to be added to EIS Section 2.4, 2.5, 5.6.3 and EMP Sections 2.4, 2.5 and 5.2. Amend text in EMP Section 5 to clarify scope for support vessels.

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16	The EIS on page 94 says that ROV reports will be submitted with what type of dates. What are the environment components that will be monitored? Does the ROV survey have sediment samples? What parameters will be monitored? Sediment quality measured by grab sampling to ascertain that metal, hydrocarbon content and grain size. Sediment in fauna to determine if any changes in species diversity and abundance have taken place.	ANP	The ROV will monitor the BOP and drill cuttings and confirm that the seabed is clear of objects before leaving the drill site. Eni does not propose to undertake sediment grab sampling. Eni has committed to using water based muds to complete the drilling program and the potential for contamination of marine sediments is very low.	None.
17	There is duplication of 1 – 58 pages of these documents and the EIS.	ANP	Agreed – the EMP needs to contain a description of the activity and the existing environment, both of which are also in the EIS.	None
18	The EMP should clearly give reports and data that will be submitted	ANP	Section 6.6.2 details reporting, and refers back to Table 6.1 (Section 6.6.1) which lists the various data that will be contained within reports to the DNMA. Daily reports and end of well reports will be provided.	None
19	What reports / data will be compiled and submitted to DNMA as part of Monitoring Program? Including discharges, quantity, characteristics, etc	ANP	As above, Section 6.6.2 details reporting, and refers back to Table 6.1 (Section 6.6.1) which lists the various data that will be contained within reports to the DNMA. Daily reports and end of well reports will be provided.	None
20	Generally there is no specific Environment Management Plan and Monitoring Programme. Eni needs to commit itself in EMP and Monitoring Programme covering before drilling, during drilling and after the drilling is complete on the receiving water body with reference to DNMA guideline 7.	ANP	Eni proposes to conduct environmental monitoring that is relevant to the discharges and emissions from the drilling program, as detailed in Section 6.6.1 (e.g. qualitative assessment of drill cuttings dispersal via ROV; logging of wastes, chemical use and diesel use). Eni does not consider monitoring of water quality and sediments before and after drilling to be warranted, as the potential impacts of the exploration drilling program are localised and very short-term, posing no risk of environmental contamination.	None

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21	The National Division of Fishery and Agriculture is very concerned with the operation process of these equipments because it could cause negative impacts to small-scale fishermen (artisanal) where the sea resources are considered as the household main income. However, the explanation of the Experts of ENI Timor-Leste Company was that it will not affect the sea resources including the ecosystem (habitat).	MAFF	The Cova-1 drilling location is distant from the T-L coast and does not occur within areas that are used for artisanal fishing. Eni does not expect T-L fishing activities to be affected by the drilling program.	None.
22	Before executing these activities, consultation should be done for the Communities or Fishermen in the area where the referred activities are to be done about the objective, advantages and disadvantages from the activities.	MAFF	Stakeholder consultation meetings were conducted in February and August 2010. The drilling program is located distant from fishing areas and will not affect these activities.	None.
23	Take caution on the operation of the equipment, oil spills, and mud discharges during the drilling period.	MAFF	Management of oil spill risks and drilling discharges are described in EIS Sections 5.4 and 5.6 respectively, as well as EMP Sections 5.3 and 5.2 respectively.	None.
24	Request to ENI Timor-Leste Company to hold on the principles of Sea Environment so that the drilling activity will not give negative impact to Biota in the referred area and others.	MAFF	Eni's conclusion from the EIA process presented in the EIS is that the drilling program will have no long-term or widespread effects on the marine environment, given the management controls proposed.	None.
25	The National Division of Environment from the technical part will participate (involve) in the activity to observe visually and technically as needed.	MAFF	Representatives from the DNMA (and possibly other government agencies) are welcome to come onboard the drilling vessels to observe the activities. Some safety requirements will apply. These issues will be discussed with DNMA after the approvals process has been completed.	None.
26	Lastly, the National Division of Fishery and Agriculture (DNPA) for the National Division of Environment should make an agreement, if during the activity there would happen any negative impact or destruction, the Company will take the responsibility for the impact.	MAFF	Eni commits to managing its activities to high environmental standards, and will be responsible for environmental and other potential incidents as required by the Production Sharing Contract for permit area S06-03.	None.

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27	Suggestions: 1. Should avoid the spilling of oil in the sea; 2. Avoid of having excessive solid and hazardous wastes; 3. Avoid the excessive or overload of the discharges of the drilling; 4. Solicitation for a mutual cooperation among the relevant institutions for avoiding the negative impacts to the environment of Timor-Leste.	National Division of Industry	Management of oil spill risks, solid and hazardous wastes, and drilling discharges are described in EIS Sections 5.4, 5.5 and 5.6 respectively, as well as EMP Sections 5.3, 5.6 and 5.2 respectively. Liaison with the DNMA and other stakeholders in accordance with T-L environmental assessment laws is described in EIS Section 1.5 and EMP Section 1.5.	None.
28	Two months were wasted between when these documents were finalized before they were distributed to stakeholders. As "stakeholders" include all the people of Timor-Leste, we appreciate Eni's permission for La'o Hamutuk to distribute these documents via internet, but encourage DNMA and the company to find more inclusive consultation mechanisms in the future.	La'o Hamutuk	The EIS and EMP documents were submitted to the DNMA in April 2010, and provided to other stakeholders in July, three months later. Eni agrees that a more timely stakeholder review period would have been beneficial. The delay was the result of some miscommunication between Eni and the DNMA about distribution of the documents. On 7 July 2010, Eni distributed the Cova EIS and EMP documents to the 20 stakeholders that were identified by the DNMA. A second stakeholder consultation meeting was held on 24 August 2010.	None.
29	Suggest that the communication continue during and after drilling, with distribution of environmental and other reports (such as those described in EMP section 6.6.2) to stakeholders as the project progresses. Stakeholders should be included in any review conducted according to section 6.7 of the EMP.	La'o Hamutuk	Audit reports and incident reports will be provided to the DNMA and ANP, as regulators of the activities. These types of documents are not typically distributed to other public stakeholders, as the subsequent review, comment and revisions process becomes less manageable with multiple people providing input. However, Eni can see the benefit of publishing these reports when finalised, from a public-information and transparency point of view. Eni will discuss this request further with DNMA and ANP prior to deciding on a way forward.	None.

	Comment	Stakeholder	Company Response	Actions for Eni
30	We urge that Eni focus additional attention, including on maintenance before the Cova-1 drilling starts, on the Saipem 10000 and its BOP and other emergency response components.	La'o Hamutuk	The Saipem 10000 has been in drydock in Singapore from May to August 2010 for maintenance and safety inspections. Safety-critical components of the rig (e.g. the BOP, emergency shutdown systems, well control systems, evacuation systems such as lifeboats) were inspected in a formal "validation" process by third party auditors (Rig Inspection Services Pte Ltd). The documentation to support this process has been supplied to the ANP, under the safety regulations applying to petroleum activities in the Timor Leste Exclusive Area.	None.

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31	The Cova-1 EIS and EMP do not explicitly state that Eni will implement procedures such as those neglected at Montara (e.g. testing, installation of safety equipment, and emergency response), which means that Timor-Leste must take Eni at its word.	La'o Hamutuk	All drilling activities conducted by Eni Timor Leste must be in accordance with the Eni corporate worldwide standards. These standards adopt best practices and are continually revised to ensure that incidents like Montara and Macondo are addressed and mitigations are implemented to prevent such accidents occurring on our wells.	Add summary of safety case process into EIS Section 2.10
			Following on from these incidents, Eni HQ has increased the control on all deepwater activities by implementing an internal verification of the well programs. All well designs for deep water applications (>1500ft water depth) are to be approved by Eni headquarter divisions to ensure they comply with the standards.	
			Over and above that, we continue to fulfil the requirements of the ANP in our bid to gain approval to drill. Eni has submitted the drilling contractor's vessel safety case (VSC) which is currently under review by the ANP. The scope of validation and the validation report, which addresses the rig's compliance to various standards, has also been submitted.	
			The drilling vessel is being inspected by third party auditors to provide an independent report on the condition of the rig and the rig's adherence to its safety documents and maintenance requirements. This report will be presented to the ANP prior to entering Timor Leste waters as per the regulations.	
			The current safety assessment process does not call for public review of these documents. However, we could summarise the process in the final version of the EIS to alleviate these concerns.	

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32	Page 68 of the EIS models a spill of 1.8 million litres per day over only five days, after which it's assumed the leak will be resolved. However, recent experience shows the dangers are much greater, and we urge Eni to expand its model scenarios to more realistic levels.	La'o Hamutuk	Oil spill modelling will be amended as Cova-1 drilling is now being undertaken in the summer season. Longer-term modelling (8 weeks) will be included to simulate a well blowout. In this season the prevailing winds are from the west and the T-L coastline is not under threat.	Amend oil spill modelling in EIS Section 5.4.3.
33	Page 70 of the EIS predicts that oil may reach West Timor from Cova-1 within two days of the small spill Eni has modelled. We hope that Eni has discussed the pending Cova-1 project with Indonesian as well as Timor-Leste authorities.	La'o Hamutuk	So far, Eni has not conducted consultation with the Indonesian government on our activities. Eni will consider this issue further and advise our approach in due course. It is also noted that drilling was originally planned for July when winds are directed predominantly from the south east. As a result, probability plots show oil reaching the West Timor coastline. Drilling is now scheduled for the Summer months, when winds blow predominantly from the west and any oil would be transported east into the Timor Sea.	Amend oil spill modelling in EIS Section 5.4.3.

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34	Two weeks ago, Eni told La'o Hamutuk that its Oil Spill Contingency Plan (OSCP) is not finished, and that it will likely be provided in mid-August, around the time of the Cova-1 stakeholder meeting. Given the inadequate spill modelling in the EIS and EMP, La'o Hamutuk is concerned that the OSCP may not realistically consider worst-case spill sizes and flow rates, and we urge that it be subject for public consultation as part of the EMP, with an additional opportunity for stakeholder comment before the EMP is approved. This also applies to other relevant documents, such as the Timor-Leste Emergency Response Plan and Saipem 10000 Drilling Campaign Emergency Management Plan referenced in the EIS and EMP.	La'o Hamutuk	As above, Eni has commissioned modelling of an eight-week oil spill, and the results will be incorporated into the OSRM for the drilling campaign. Eni would be happy to provide the OSRM to stakeholders for information before the start of drilling. Eni understands that these documents are assessed separately from the EIA process.	Forward copy of OSRM to DNMA and other stakeholders as required, before the start of drilling
35	The OSCP should spell out Eni's agreements with the Australian Maritime Oil Spill Centre and operators of nearby projects, as they may be called upon to support emergency response efforts.	La'o Hamutuk	The OSRM does include information on Eni's membership of Oil Spill Response Limited (OSRL), who are based in Singapore and service south-east Asia. In the event of a tier 2 or 3 spill at Cova, OSRL will be our third-party assistance provider. Eni has also sent correspondence to other operators in the area outlining our willingness to enter an alliance on oil spill response so that rigs and services can be shared if needed. These discussions are ongoing. The Australian Petroleum Production and Exploration Association (APPEA) is also coordinating discussions regarding an industry approach; Eni is a member of this group.	None.
36	Pages 55, 65 and 66 of the EMP imply that associated gas will be flared if it is found in Cova- 1. However, Eni Australia told La'o Hamutuk on 21 July that no oil or gas flaring will occur during this project. We hope that this is true, and urge that the EIA and EMP be revised to reflect this commitment.	La'o Hamutuk	Since the EIS and EMP were developed, the exploration drilling plans have changed and now do not include well testing, which would typically require flaring of hydrocarbons from the reservoir.	Clarify flaring in EIS Section 2 and 5.7, and EMP Sections 2, 4.3 and 5.4.

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37	The EIS and EMP documents do not give any information about Eni's plans to allow Timor-Leste regulatory authorities to visit and inspect Cova-1 operations. Given ANP and DNMA's responsibility to protect Timor-Leste's health, safety and environment – and the fact that companies left to themselves cannot be relied upon to do that La'o Hamutuk strongly encourages the DNMA and ANP to deploy personnel on the Saipem 10000 for as many of the 45 days of operation as possible, and urges Eni and Saipem to cooperate.	La'o Hamutuk	Eni agrees that on-site observation of our activities by the Timor Leste regulators is beneficial, from both compliance and information-sharing perspectives. Eni has extended an invitation for representatives of the ANP and DNMA with appropriate safety certifications to visit our vessels, and will continue to do so.	None.
38	Eni promised \$4.5 million in local content (out of an \$85 million work program) for Block C in its April 2006 proposal, which was an important factor in Timor-Leste awarding the PSC to Eni rather than to Petronas consortium's competing bid. This commitment, which included two exploration wells, was to be carried out in the three years prior to November 2009. It is eight months later, and we wonder how much of that commitment has been fulfilled, or if Eni and RDTL have agreed on a new schedule or amounts.	La'o Hamutuk	Of the total commitment of US\$9.5M across all of Eni's permit blocks, at end 2009 Eni had spent some \$5.6M on local content, which includes the use of local goods, services and labour, and social development projects. The remainder of the committed funds has been rolled over to a second exploration period and is expected to be fully acquitted during the 2010-2011 period.	None.

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39	In several places, Eni's EIS and EMP contain inaccuracies or wrong information. Although these may not be directly relevant to Cova-1's environmental consequences, they indicate a carelessness which is unacceptable in a project like this. For example, EIS and EMP chapters 2.2 say that Laminaria-Corallina is in the JPDA and mentions Elang-Kakatua, which ceased operation three years ago, as a "producing" oil field (as do EIS chapter 4.3 and EMP 3.3.3). Paragraph 5.11.1 says that Buffalo is in the JPDA; it was also stolen by Australia.	La'o Hamutuk	These points are noted and the errors will be corrected when Eni submits the final version of the EIS and EMP documents.	Amend noted inaccuracies in the EIS and EMP.
40	Similarly, Eni relies on the <i>CIA Factbook</i> for its socio-economic profile in EIS paragraph 4.3. Primary sources, such as RDTL or UN documents, would be more current and detailed.	La'o Hamutuk	Noted, reference sources will be updated where possible when Eni submits the final version of the EIS and EMP.	Revise presentation of EIS Section 4.3 and EMP Section 3.3, including referencing
41	EIS Paragraph 4.1.1 and EMP paragraph 3.1.1 discuss typical climate and weather in the Cova-1 area during September, which is usually dry and storm-free. However, this year has been anything but typical in this region, with unseasonable rains, flooding, and strong winds. Whether this is due to climate change, statistical fluctuations, or <i>El Nina</i> , Eni needs be prepared for more extreme weather than is normally expected.	La'o Hamutuk	Extreme weather conditions are always taken into consideration in offshore drilling plans. Eni's understanding of the conditions is based on a comprehensive metocean study of the area, which includes extreme value analysis. Operational weather forecasts will be monitored regularly throughout the campaign.	None.
42	EIS Paragraph 5.11.4 (EMP 3.3.4) about vessel movements near Cova-1 during the relevant period should include those that Reliance, if it gets DNMA and ANP approval, will operate near Block K, as well as any seismic exploration that may be conducted at the time.	La'o Hamutuk	Noted, Eni will be in consultation with the ANP and Customs in the lead-up to the drilling program, to maintain an up-to-date understanding of navigation issues in the area.	None.
43	The DNT suggests to Eni Timor-Leste that when the petroleum exploration drilling program starts it should not create negative impacts to tourism activities and the daily life of the population.	Tourism	The drilling location is distant from the T-L coastline and no tourism values occur in the area. Eni does not expect any impacts to the tourism industry as a result of the drilling campaign.	None.