



The report on implementation of environmental
and social action plan by LLC "Irkutsk Oil
Company" in 2008

IRKUTSK, 2009

Irkutsk Oil Company (IOC) has taken on additional obligations regarding the management of environmental and social issues as a result of the European Bank for Reconstruction and Development (EBRD) taking an equity stake in the business. ENVIRON, a leading international environmental consulting company, was invited as an independent environmental advisor for further development of comprehensive Environmental and Social Actions Plan, sustainable use of natural resources and mitigation of environmental impacts.

The Company has created an Environmental Committee chaired by the CEO of IOC, which considers the issues related to health, safety, environment and industrial aspects on a weekly basis.

INK spent around 50 million rubles for environmental activities in 2008.

The following activities implemented by the Company are considered as a priority:

- Development and implementation of an environmental management system compliant with relevant international standards such as ISO 14001:2004.
- Conducting the environmental monitoring at all fields of the Company, involving scientific institutes of Irkutsk research center of Siberian branch of Russian Academy of Sciences.
- Preparation of design documentation for a domestic solid waste landfill in the area of Verhnemarkovo village (its construction is commenced in 2009). After commissioning of the landfill, both Company wastes and domestic wastes from Verhnemarkovo village will be disposed there. The landfilling of domestic wastes from the village residents will be free of charge.
- The purchase of compact wastewater treatment stations (CCS-12 – 2 pcs., CCS-50 – 2 pcs.). During summer season of 2009 these installations will be commissioned and a new sewage system pipeline will be installed.
- The project of associated gas re-injection at the Yarakta field is of special importance to Irkutsk Oil Company. Its implementation will almost completely eliminate all routine flaring of associated gas and considerably reduce atmospheric air pollution.

In the process of setting the production goals the Company has open dialogue with all stakeholders concerning environmental safety and protection activities and never forgets that environmental protection and the health and safety of both employees and residents is of paramount importance.

ENVIRON, the international environmental advisor, completed a review of IOC's existing corporate Environmental and Social Action Plan (ESAP) as part of an initial environmental review. The findings are summarized in the table 1 and Figure 1 below.

The status column of the table classifies actions as either:

Not Started	Work not yet started on task (0 points)
Ongoing	Work underway on task (1 or 2 –points depending on progress in implementation of the task)
Completed	Task completed, and evidence supplied to the satisfaction of EBRD (3 points)

Not applicable	Not applicable to the Task at this stage (not accounted in the analysis of implementation status)
-----------------------	---

The ongoing works are assessed using the point rating system. Two points imply that the work is being executed in full compliance with requirements of Russian legislation and regulatory documents and in full accordance with the EBRD's Environmental and Social Policy. One point signifies that the work needs to be accelerated. The percentage of completing as a qualitative assessment is provided at the end of each section.

Table 1. The assessment of Company's Environmental and Social Action Plan implementation

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
1. General issues of corporate environmental, health and safety management					
1.1	Develop detailed plans including resource allocation and timing for the upgrading of Environmental Management capabilities of the company.	Allow further development of the system/capabilities to be factored into overall company plans and budgets	Plan to be developed and agreed with EBRD by time of Final Review	Completed 3	
1.2	Retain an Independent External Advisor to assist the company in development and implementation of the Environmental management System. This Advisor while the day to day reporting will be to INK, there will be a direct reporting line to EBRD Environmental Department also for the tracking of progress on implementation of this ESAP.	To provide INK the international expertise required to comply with EBRD Environmental Policy requirements and to keep EBRD updated on progress of ESAP implementation	ToR must be agreed with EBRD before final consideration. Contract executed and advisor mobilized within three months of signing investment agreement .	Completed 3	Independent External Advisor is invited
1.3	Develop and introduce an integrated EHS management system on the basis of standards such as ISO 14001 and OHSAS 18001	Compliance with the requirements of ISO 14001 and OHSAS 18001; Efficient environmental management, improving of the Company's reputation and ability to implement EBRD	End of 3 rd quarter of 2010	Ongoing 1	Works on the corporate environmental management system has started. ENVIRON recommends to include social aspects in the system under development. Time-schedule for the integrated system development and implementation is

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
		Environmental Policy Requirements			revised.
1.4	Strengthen the staff of the environmental protection service of the Company; allocate in a well defined way the responsibilities for environmental recording and reporting, as well as supervision over environmental compliance between specific officials in the head office and in the fields. Ensure that the new EMS incorporates requirements of EBRD Environmental Policy, and provide internal training on what these requirements mean on the ground.	Improved efficiency of the internal supervision system	Immediately and key positions to be filled within three months of signing investment agreement.	Completed 3	Environmental and land-use department has been created. Two new employees were hired. Department of Production's Environmental Control has been created. Permanent environmental control under the activities of subsidiaries and contractors is carried out. Position of deputy director is filled
1.5	Ensure objective calculation of environmental pollution charges in the Irkutsk Oil Company and its subsidiaries, as well as timely payment of pollution charges.	Prevention of fines that might be imposed by the RF tax agency for non-compliance with the timeframe for payments and sanctions for the arrears.	On a permanent basis	Completed 3	Specialist is contracted for calculations on quarterly basis of payments for negative impact to the environment.
1.6	Carry out training of the Company's officials in environmental safety issues in external specialized training centers and organize periodic training of the Company's employees involved in operation of field facilities.	Higher level of responsibility of specialists for non-compliance with the legislation. Involvement of the operating personnel in environmental protection activities.	On a permanent basis	Requirements satisfied, ongoing 2	Employee environmental training has begun. The personnel of executive level completed the training course "Environmental protection by managers and specialists of major management systems", 36 employees completed the training course "Environmental protection of

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
					work with hazardous wastes handling”. Initial training in EMS according the ISO 14001 has been conducted
1.7	Improve periodic internal monitoring of compliance with the EHS requirements at industrial facilities; register the findings and develop corrective action plans.	Compliance with the environmental and industrial safety requirements. Elimination of risk of sanctions that might be imposed on the Company by the supervisory agencies.	At least once per quarter of a year	Requirements satisfied, ongoing 2	The Company has developed the Regulations on procedures of industrial control implementation with regard to environmental protection at industrial facilities. Monitoring is carried out in accordance with the approved schedule, once a year (according to the contract with certified laboratory – CLATI). Implementation of internal audits on the regular basis in the course of EMS implementation would significantly improve the situation.
1.8	Ensure continuous monitoring of the contractors’ compliance with the EHS requirements; register the findings and develop corrective action plans.	Supervision over contractors’ compliance with the legislative requirements. Elimination of risk of sanction to be imposed on the Company through the contractors’ fault.	At least once per quarter of a year	Requirements satisfied, ongoing 2	Corporate standard in the sphere of labor protection, industrial safety, and environment protection has been implemented and embedded into agreements with contractors. Inspections are carried out on a periodical basis.

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
General issues of corporate environmental, health and safety management = 18/24*100=77.8%					
2. Emergency response planning					
2.1	Update the oil spill response plans on a regular basis in the course of the field development and commissioning of new facilities.	Compliance with the environmental and industrial safety requirements	As required	Requirements satisfied, ongoing 2	Oil spill response plans are developed for all new facilities. Oil spill response plans are amended for acting facilities if needed.
2.2	Ensure development of an oil spill response plan for potential accidents in the process of oil product transportation by contractors by tank trucks and ensure preparedness of the personnel and technical means.	Compliance with the environmental and industrial safety requirements in the process of oil product transportation by contractors	The works have been started, the revision of plan will be in the 1 st quarter of 2009	Requirements satisfied, ongoing 2	Has been developed, in the process of internal approval
Emergency response planning = 4/6*100= 66.7%					
3. Dialogue with internal and external interested parties					
3.1	Organize continuous informing of the local communities and external stakeholders about environmental aspects of the Company's operations and issues relating to exploitation of oil and gas reserves and construction of field facilities.	Elimination of risk of sanctions that might be imposed by the authorities, including even withdrawal of the rights for use of land plots	On a permanent basis	Requirements satisfied, ongoing 2	All company's projects are reviewed through the process of public hearings and consultations.

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
3.2	Introduce a procedure for collection of proposals and complaints from the employees (with due confidentiality)	Improvement of the feedback between the Company's management and the operating personnel of the Company's facilities	On a permanent basis	Completed 3	The instruction "About the processing of public complaints and requests in Irkutsk Oil Company LLC" was approved by the Company resolution #137/00-p of July 31, 2008. Complaints and requests are recorded in a special journal. There are complaint boxes in the all visited departments of the Company.
3.3	Clarify in detail the issue of ancestral lands used by the indigenous ethnic minorities within the outlines of oil fields and license areas, and in case of the presence of any such land establish proper relations with the communities / individuals and ensure that their interests are taken into account and protected in compliance with the applicable legislation and the common world practice and EBRD requirements.	Assessment of the risks of the Company's liability associated with the presence of land traditionally used by the indigenous ethnic minorities	Immediately	Requirements satisfied, ongoing 2	Hunting areas of indigenous people communities are mapped. Information on the registered associations of the indigenous people has been obtained from the authorities. Consultations on the company's planned activities with associations of indigenous people have been started. Charity agreements with associations of indigenous people have been concluded. Evidences of systematic work with indigenous people communities are provided.
Dialogue with internal and external interested parties – 7/9*100=77.8 %					

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
4. General issues relating to land use					
4.1	Complete the preparation of the title documents for the land plots in all license areas.	Elimination of risk of sanctions that might be imposed by the authorities, including even withdrawal of the rights for use of land plots	On the permanent basis	Requirements satisfied, ongoing 2	All the entitling documents for all license plots of the Company's activities are prepared. The cadastral registration works and registration of rights on new plots are being systematically carried out.
4.2	Have approved by the supervisory agencies the position of the boundaries of sanitary protection zones (SPZ) of industrial sites of the Company's subsidiaries located in the vicinity (up to 1 km) of residential areas; develop and have approved appropriate SPZ designs.	Identification and subsequent elimination of risks associated with the SPZ status	The 3 rd quarter of 2009	Requirements satisfied, ongoing 2	The design documentation of sanitary protection zone was developed by a specialized organization. The documentation is in the process of approval by the Federal Service on Natural Resources Use.
General issues relating to land use – 4/6*100=66.7%					
5. Water requirement and water supply sources					
5.1	Carry out an inventory of all existing water wells, equip in due manner the sanitary protection zones around the water wells and ensure compliance with their status.	Compliance with the water conservation legislation	The 2 nd quarter of 2009	Completed 3	Existing water wells have been accounted. Zones of strict sanitary protection for water wells are fenced.
5.2	Organize primary recording of water consumption and preparation of required reporting at industrial facilities.	Compliance with the water conservation legislation	The 4 th quarter of 2009	Completed 3	Water meters are installed at water wells, water extraction is registered.

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
5.3	Conclude agreements for use of water from surface water bodies for hydraulic testing of pipelines	Compliance with the water conservation legislation	Until the next pipeline testing	Completed 3	Groundwater is used for pipeline hydraulic testing. All necessary documentation is in place.
5.4	Obtain Resolutions for allocation of surface water bodies for location and construction of linear facilities in relation to the existing and planned road and trunk pipeline routes in accordance with the prescribed procedure	Compliance with the water conservation legislation	2008	Completed 3	The systematical works are being implemented. There is a Rosprirodnadzor clarification specified that as surface water bodies are not used there is no need to obtain a permit.
5.5	Carry out an inventory of industrial facilities located within water protection zones of water courses; have approved by the supervisory agencies the environmental action plans for operation of such facilities in water protection zones.	Compliance with the water conservation legislation	2008	Completed 3	The inventory has been conducted
Water requirement and water supply sources– 15/15*100=100%					
6. Wastewater removal and treatment					
6.1	Develop, have approved by the supervisory agencies and implement a program for monitoring the chemical composition of wastewater removed from the Company's facilities to water courses or to the ground. Based on the findings carry out adequate	Prevention of penalties and sanctions for non-compliance with the norms for discharge of chemical substances	On a permanent basis	Not applicable	Not applicable, as there is no wastewater discharge to surface water bodies.

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
	corrective measures.				
6.2	Develop document specifying the maximum permissible pollutants discharge limits (PDS document) for existing facilities with discharge of sanitary wastewater, storm water runoff and industrial effluents to the environment; obtain Permits for wastewater discharge.	Compliance with the legislation relating to soil, underground and surface water protection	2008	Not applicable	Not applicable, as there is no wastewater discharge to surface water bodies.
6.3	Carry out reclamation of cesspools and install septic tanks with proper lining or biotoilets along the pipeline route and at field facilities, where operating personnel is present permanently (during the period prior to commissioning of wastewater treatment facilities in the fields).	Compliance with the legislation relating to soil, underground and surface water protection	2008	Requirements satisfied, ongoing 2	Hydroisolation works of the septic pits has been started during the summer period in agreement with developed program. The works are planned to be completed in 2009. The bio-toilets have been purchased.
6.4	Install local treatment facilities for treating sanitary wastewater in accommodation camps; ensure collection of sanitary wastewater from the individual sites without their own sewerage systems and its delivery to the treatment facilities.	Compliance with the legislation relating to soil, underground and surface water protection	As soon as possible	Requirements satisfied, ongoing 2	Compact wastewater treatment installations (CPS) for Yarakta field were purchased. Their installation will be carried out during the summer of 2009. Vacuum truck for pumping sewage from septic pits and further transportation and disposal was also

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
					purchased.
6.5	Ensure hydroinsulating lining of industrial sites / areas used for storage of fuel, lubricants and chemicals in accordance with the respective designs; install storm water runoff drainage systems and oil traps.	Compliance with the legislation relating to soil, underground and surface water protection	As soon as possible, to be initiated during the summer of 2008 and to be standard on all new facilities	Completed 3	The works have been started and will be completed in the 3 rd quarter of 2009. The evident proofs were straightforward in course of the objects' visit. All the new facilities are equipped in accordance with the requirements.
Wastewater removal and treatment – 7/9*100=77.8 %					
7. Atmospheric air protection					
	Develop a plan for gas utilization and have the plan approved by EBRD. This plan must rely on in field use and re-injection and avoid routine flaring.			Completed 3	Design documentation for natural gas reinjection has been developed. Start-up in Yarakta is planned in 2009.
7.1	Develop and have approved documents specifying the maximum permissible air emissions (PDV document) for all operating facilities. Obtain Air Emission Permits (including those for construction and exploration contractors working in license areas).	Compliance with the requirements of the Law "On Atmospheric Air Protection"	First half of 2008	Requirements satisfied, ongoing 2	PDV documents have been developed for all INK facilities. Company implements necessary measures for compliance of contractors activities in line with requirements.

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
7.2	Update the existing PDV documents to take into account all existing air emission sources and ways of impact on ambient air.	Compliance with the requirements of the Law "On Atmospheric Air Protection"	4 th quarter of 2008	Completed 3	PDV documents for production facilities are amended on "as needed" basis
7.3	Carry out on a regular basis and to the full extent monitoring of air emissions and ambient air quality in zones impacted by the Company in accordance with time schedules and program of sanitary hygienic monitoring approved by Rostekhnadzor.	Compliance with the air emission norms and ambient air quality at the SPZ boundaries	On a permanent basis	Requirements satisfied, ongoing 2	Environmental monitoring is carried out in accordance with the monitoring schedule once a year, according the contract with CLATI
7.4	Ensure objective calculation of annual gross emissions based both on the monitoring results and the actual balance of fuel consumption / associated gas flaring.	Compliance with the requirements of the Law "On Atmospheric Air Protection"	On a permanent basis	Requirements satisfied, ongoing 2	Monitoring data is used at calculation of total emissions.
Atmospheric air protection – 12/15*100=80.0 %					
8. Hazardous materials					
8.1	Ensure compliance with the sanitary and environmental safety requirements in the process of onsite storage of hazardous materials (storage in special rooms, under shelters, trays for spill containment).	Compliance with the environmental and sanitary legislation	Starting from 2008	Requirements satisfied, ongoing 2	The work have been started and ongoing on systematical basis
Hazardous materials – 2/3*100=66.7 %					
9. Waste management and handling of highly hazardous substances					

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
9.1	Obtain a License for handling of hazardous waste	Compliance with the requirements of the environmental legislation	Starting from 2008	Completed 3	The license is obtained in 2008
9.2	Develop an Integrated Waste Management Plan for all subsidiaries focusing on minimization, reduction and re-use. This plan should also look for infrastructure sharing with the local communities	To minimize risks associated with waste disposal.	Agree internally and with EBRD a detailed plan for the development and Implementation of this Waste Management Plan during 2009. Tasks to be implemented in accordance with the overall plan and over several years.	Ongoing 1	The work on this has started. The format of integrated waste management plan has been developed, however it looks like a set of procedures of accounting wastes generation and transportation at the sites and facilities of IOC and its contractors, upon the further development this plan could be a part of EMS.
9.3	Develop a document specifying the waste generation norms and permitted waste disposal limits (WGWDL) and obtain the approved limits for waste disposal in 2008 for all operating facilities; collect data referring to existing WGWDL documents in contractor organizations (contractors performing construction, drilling and other operations); ensure proper reporting by contractors and	Compliance with the requirements of the Law "On Industrial and Domestic Waste"	Starting from 2008	Requirements satisfied, ongoing 2	WGWDL is developed for Irkutsk Oil Company LLC. The work on waste passportization for subsidiaries has started. The preparatory activities on substantiating documentation for the obtaining limits for waste disposal for subsidiaries should be included in the integrated waste management plan for all company's departments.

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
	implementation of measures approved by supervisory agencies.				
9.4	Update the existing WGWDL documents and approved waste disposal limits to ensure compliance of the operations with the approved documents.	Compliance with the requirements of the Law "On Industrial and Domestic Waste"	Starting from 2008	Completed 3	Updating of WGWDL projects and corresponding waste disposal limits is carried out on "as needed" basis.
9.5	Develop appropriate designs and construct landfills for waste disposal in the fields / purchase incinerators for environmentally safe waste disposal.	Compliance with the requirements of the Law "On Industrial and Domestic Waste"	Starting from 2008 Stop practice of trench disposal of oily waste in trench prior to EBRD Final Review.	Requirements satisfied, ongoing 2	Design documentation for solid waste landfill is prepared. Thermal waste incineration unit at Verhnemarkovo is commissioned. The solid waste landfill in Verhnemarkovo is being constructed. As it is planned to install incinerator at Yarakta field, decision was made not to construct the solid waste landfill at Yarakta.
9.6	Equip the areas used for short-term waste storage in compliance with the regulations; conclude agreements for supply of hazardous wastes to specialist organizations.	Compliance with the requirements of the environmental and sanitary legislation	Starting from 2008	Completed 3	Waste containers are purchased and located in the fields. Waste transportation truck is purchased for collection and transportation of waste.
9.7	Carry out an inventory of asbestos / asbestos-containing materials available at the	Specify the scale of the use of hazardous substances.	Starting from 2008	Completed 3	Inventory of asbestos and asbestos-containing materials in all facilities is

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
	Company's facilities. Develop an instruction for safe handling of ACMs. Bring the areas where asbestos is used into compliance with the sanitary norms applicable in the RF.	Compliance with the requirements of the sanitary legislation.			completed. The instruction for handling of asbestos-containing materials and wastes is being developed.
9.8	Carry out radiological survey of all fields and license areas.	Compliance with the requirements of the environmental and sanitary legislation	Starting from 2008 Further tests on drinking water to evaluate previous results indicating levels in excess of standards prior to EBRD final review.	Requirements satisfied, ongoing 2	Radiological survey of existing fields is carried in the process engineering and environmental investigations.
Waste management and handling of highly hazardous substances –19/24*100=79.2 %					
10. Soils and groundwater					
10.1	Organize land reclamation in areas where the work has been completed (in accordance with the respective designs).	Restoration of the initial condition of land	on a permanent basis	Not applicable at the current stage	No reclamation was conducted as the works at all land allotments are not completed yet.
10.2	Carry out detailed investigation of soils and groundwater in areas of potential contamination to assess the actual level of	Compliance with the Russian and international requirements	Starting from 2008	Requirements satisfied, ongoing	During the baseline surveys the historic land pollution is being determined. No evidence of

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
	historic pollution of the industrial sites and determine the need for land remediation.			2	conducted soils and groundwater monitoring was provided.
10.3	Carry out remediation of contaminated soils if the contamination level exceeds the criteria for remediation applied in the RF.	Compliance with the requirements relating to land and groundwater protection	Starting from 2009 On a permanent basis	Requirements satisfied, ongoing 2	The monitoring of residual pollution in the area of the accidental spill (pipeline braking) is required to be carried out.
Soils and groundwater – $4/6 \cdot 100 = 66.7\%$					
11. OHS performance					
11.1	Strengthen primary and periodic training of managers in occupational health issues.	More stringent responsibility of managers for violation of the requirements of the labor legislation	Starting from 2008	Completed 3	The training of managerial staff has been conducted.
11.2	Complete attestation of workplaces to assess their compliance with the sanitary regulations. Based on the findings take corrective measures to improve the working conditions.	Compliance with the sanitary regulations at workplaces	2008	Requirements satisfied, ongoing 2	240 work places have been attested in the period of 2007-2008. It's planned to attest 100 work places in 2009.
OHS performance – $5/6 \cdot 100 = 83.3\%$					
12. Sound use of natural resources					
12.1	Implement projects on associated and natural gas injection into the respective formation in	Abatement of the impact on the atmospheric air.	2008-2011	Requirements satisfied,	The tender on the development of the design documentation on associated gas reinjection at Yarakta

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
	the Yarakta field. Consider the possibility of implementation of injection operations in the Markovo and other fields.	Greenhouse gas emission reduction. Improvement of the environmental reputation of the Company		ongoing 2	field has been conducted. The project will be designed accordingly. The tender on the development of the design documentation on associated gas reinjection at Markovo field has been announced.
12.2	Develop engineering designs and take measures to ensure produced water injection into a collector stratum in the fields.	Compliance with the requirements of the license agreements. Reduction in the impact on surface and underground waters. Improvement of the environmental reputation of the Company.	2008-2009	Requirements satisfied, ongoing 2	The design documentation for infrastructure development of Yarakta field has been prepared
Sound use of natural resources – $4/6 \cdot 100 = 66.7\%$					
13. Key Ongoing Environmental Requirements					
13.1	Complete Environmental Audit prior to acquisition of any new asset, facility or license area and provide audit report to EBRD Environmental team	Early identification of possible environmental risks and liabilities	To begin immediately and to run through the investment period	Requirements satisfied, ongoing 2	There was no necessity for such audit in 2008 - 1 st quarter of 2009 due to the absence of new facilities acquired. It will be a part of EMS.
13.2	Complete Environmental and Social Impact	To ensure possible impacts are	To be implemented	Requirements satisfied,	ESIA was prepared in 2008. It was

#	Action	Expected effect	Recommended timeframe for implementation	Status	Comments
	Assessment (including public consultation and collection and verification of site specific baseline data) in accordance with EBRD Environmental Policy prior to development of any existing fields (including Yarakta field). The report must be provided to EBRD for review and approval at least six weeks prior to start of development activities.	avoided, minimized or mitigated.	immediately and run through the investment period.	Ongoing	posted at the web-sites of EBRD and the company, and was presented to the administrations of Ust-Kut and Katanga municipalities. The public hearings and consultations were held at the territories of project impact. It will be a part of EMS.
13.3	Periodical visits/audits by EBRD Environmental Team or their designated representatives. Company is to assist on logistics for such visits and to ensure propose access to information and site facilities.	To monitor compliance with this EASP	No more than once per year	Requirements satisfied, ongoing	The scheduled visits of EBRD were in July 2008 and the August 2009.
Key Ongoing Environmental Requirements – 6/9*100=66.7 %					



Evaluation of implementation of existing ESAP - Irkutsk Oil Company (as of August 6, 2009)

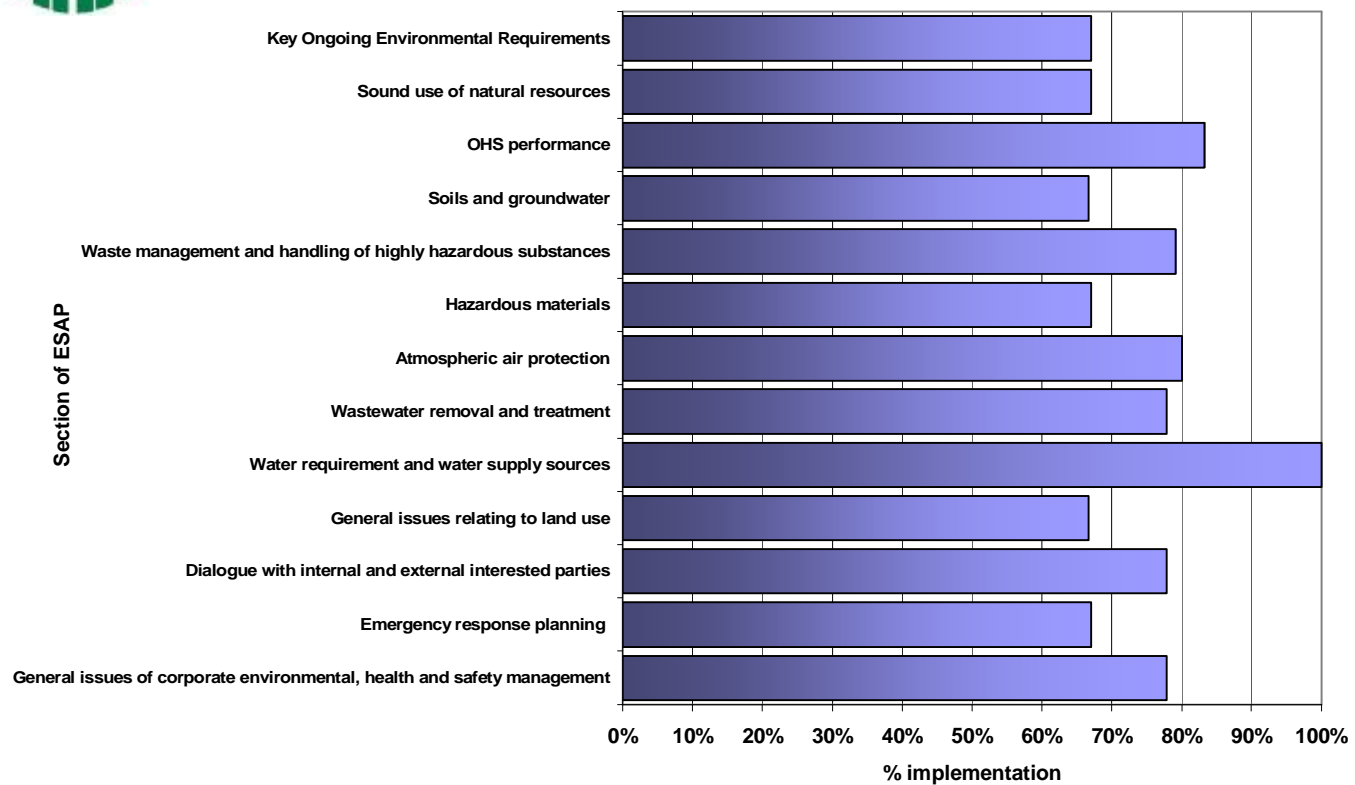


Figure 1. Evaluation of implementation of sections of ESAP.