

APPENDIX II

Completion of the LNG Import Terminal Project at the Vasilikos Area

PROJECT DESCRIPTION

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1. INTRODUCTION

ETYFA has awarded Ms. T.EN PMC Services Limited for Project Management Services for the execution of Phase - 1 and Phase - 2 for the completion of LNG Import terminal project at Vasilikos Area, in the district of Larnaca, Cyprus. This Project Description document provides scope and current status of the project for the new EPC Contact. This Project Description is provided for general guidance purposes only, with a view to assisting Candidates in understanding the Project. Candidates and thereafter Pre-Qualified Tenderers, must satisfy themselves as to the accuracy and completeness of the information contained herein as any adoption of such information shall be at the Tenderers' own risk and responsibility.

2. DEFINITIONS & ABBREVIATIONS

Wherever used in this procedure, the following words shall have the meaning as given hereunder:

Abbreviation	Definition Expanded form
COMPANY	Shall mean ETYFA
PMC	Shall mean T.EN PMC Services Limited
CONTRACTOR	Party whose services are invited to Tender for performing the works specified as part of EPC package.
Candidate	An Interested Economic Operator that has submitted, or has been invited to submit, a Pre-Qualification Questionnaire (PQQ) with a view to being considered for participation in the Tender process for the Project, up to the point of being notified of the outcome of pre-qualification
Tenderer	A Candidate that has been successfully pre-qualified by ETYFA and has received the EPC Invitation to Bid (ITB), for so long as it remains a participant in the Tender process for the Project
Project	LNG Import Terminal Project at the Vasilikos Area
Site	Vassilikos, Cyprus
T.EN	Technip Energies
Vendor	Any third party supplying the equipment/materials for setting up the Plant
AGI	Above Ground Installations
API	American Petroleum Institute
CYGAS	Cyprus Gas Company
DEFA	Natural Gas Public Company of Cyprus
EAC	Electricity Authority of Cyprus
EIA	Environmental Impact Assessment
EPCOMA	Engineering, Procurement, Construction, Operation, and Maintenance Agreement
FEED	Front-End Engineering Design
EPC	Engineering, Procurement and commissioning
FSRU	Floating Storage & Regasification Unit

HAZID	Hazard Identification Study
HAZOP	Hazard and Operability Study

LOPA	Layer of Protection Analysis
NDA	Non-Disclosure Agreement
PO	Purchase Order
PRMS	Pressure Reduction & Metering Station
QA/QC	Quality Assurance / Quality Control
SIL	Safety Integrity Level

3. EXECUTIVE SUMMARY

This document is issued by Technip Energies PMC Services Limited (the PMC) on behalf of the Natural Gas Infrastructure Company of Cyprus (ETYFA) to inform potential Candidates of the scope, current status, and known characteristics of the Vasilikos LNG Import Terminal project, with a view to its completion under a new Engineering, Procurement, and Construction (EPC) contract.

The project is the construction and commissioning of an LNG receiving and regasification terminal at Vasilikos, in the Larnaca District of the Republic of Cyprus. It comprises an offshore jetty for permanent berthing of a Floating Storage and Regasification Unit (FSRU), associated marine and onshore pipelines, an onshore Above Ground Installation (AGI), an underground gas buffer storage system, and a Pressure Reduction and Metering Station (PRMS) connected to the Vasilikos Power Station.

The previous Engineering, Procurement, Construction, Operation, and Maintenance Agreement (EPCOMA) was concluded between ETYFA and a consortium led by China Petroleum Pipeline Engineering Co. Ltd in December 2019. The agreement was terminated by ETYFA on 18 July 2024 on performance grounds and is currently the subject of arbitration proceedings before the London Court of International Arbitration (LCIA). Significant works had been undertaken under the EPCOMA prior to termination, including procurement of a substantial portion of the equipment, partial construction of the jetty, partial construction of the onshore pipelines, and conversion of an LNG carrier into the FSRU vessel ETYFA Prometheas. The vessel has now completed sea and gas trials.

ETYFA, supported by Technip Energies as PMC, has carried out a structured assessment of the project's current state across site materials, engineering documentation, safety studies, and risk profile. The assessment has identified a defined set of technical gaps which a new EPC contractor will be expected to close. The purpose of this document is to allow potential Candidates to form an early, informed view of the work that is being put to tender.

4. PROJECT OVERVIEW

4.1. Owner and Project Identity

The owner of the project is the Natural Gas Infrastructure Company of Cyprus (Greek acronym: ETYFA), a special-purpose company established to own and manage the LNG Import Terminal. ETYFA's shareholding is 70 per cent held by the Natural Gas Public Company of Cyprus (DEFA) and 30 per cent by the Electricity Authority of Cyprus (EAC). The Government of the Republic of Cyprus has established a dedicated Project Steering Committee comprising representatives from the Ministry of Energy, Commerce, and Industry; the Ministry of Finance; DEFA/CYGAS; the Treasury of the Republic; the Auditor General; the Attorney General; the Public Works Department; the Department of Land and Surveys; and the Town Planning and Housing Department

4.2. Project Location

The terminal is located within the development area of the Vasilikos Master Plan, in the Mari Community, Larnaca District, approximately 36 kilometres west of the city of Larnaca. The offshore part lies in Vasilikos Bay, southeast of the EAC Vasilikos power station and west of the existing jetty of the VTT Vasiliko Ltd fuel storage terminal. The onshore plot occupies an area of 62,600 m² adjacent to the EAC Vasilikos power station. The jetty footprint at sea level is 26,500 m²; the actual seabed footprint of the supporting piles is in the order of 300 to 400 m².

4.3. Project Objective and Strategic Context

The terminal is the first element of the natural gas infrastructure of the Republic of Cyprus. It is intended to enable the substitution of liquid fuel by natural gas at the Vasilikos Power Station, with subsequent extension to other thermal power generators, industrial consumers, and bunkering operations. The Republic of Cyprus is presently an energy-isolated market with no interconnected generation capacity from other countries, and a high dependency on liquid fuels for power generation. The project therefore carries strategic significance for the security of the Cypriot energy supply and for the country's progressive convergence with the wider European energy market.

The project has been formally designated a Project of Common Interest of the European Union under the previous funding designation "CyprusGas2EU".

4.4. Principal Facilities and Key Technical Parameters

The principal facilities forming the project scope are:

- **Jetty.** A piled jetty comprising an access trestle of approximately 750 metres in a north-south direction, followed by a south-west extension of approximately 430 metres forming the FSRU berth. The trestle, breasting dolphins, and mooring dolphins are designed to accept the FSRU permanently moored alongside, and to receive LNG carriers up to Q-Flex size (approximately 217,000 m³). The berth is oriented at approximately 220°N to align with prevailing wind and wave directions. All structures are founded on steel tubular piles.
- **Floating Storage and Regasification Unit (FSRU).** The vessel ETYFA Prometheas, converted from the LNG carrier "Galea" at COSCO Shipyard (China). Containment: Moss-Rosenberg Independent Tank Type B; gross capacity at 100 per cent: 137,161 m³. Regasification system supplied by Wärtsilä, water-glycol heated. Power generation: approximately 15 MW from three gensets in N+1 redundancy. Sailing departed China on 14 December 2024; the vessel has performed sea and gas trials and is presently undergoing finalisation works at a Malaysian yard.
- **Natural gas pipeline.** Approximately 2 kilometres in length, 24-inch (600 mm) nominal diameter, welded steel construction. Largely above ground; buried sections between the Shoreside AGI and the PRMS, and between the PRMS and the Vasilikos Power Station delivery flange.
- **Natural gas buffer storage solution.** Underground 48-inch piping arrangement, 300 metres by 70 metres, fenced. Provides 125 tonnes of natural gas storage equivalent to approximately 30 minutes of operation at the maximum demand of 125 tonnes per hour, enabling the Vasilikos Power Station to switch from gas to liquid fuel in the event of supply disruption.
- **Onshore Above Ground Installation (AGI).** Provides isolation of the jetty pipeline from the onshore systems and emergency venting capability.
- **Pressure Reduction and Metering Station (PRMS).** Including PIG receiving trap, filtration system, gas analyser (chromatograph), metering, gas pre-heating, pressure reduction, future pipeline network connection, outlet valve, and emergency shutdown system.
- **Natural gas loading arms.** Two duty/standby high-pressure gas unloading arms on the jetty platform, each fitted with a quick-connect/disconnect system. Cryogenic LNG ship-to-ship transfer rate of at least 10,000 m³ per hour.
- **Overall facility availability target: 98 per cent.**

4.5. Funding

The project capital cost was estimated, as of contract award in 2019, at approximately €315 million. Funding was composed of:

- An EU grant of up to €101 million under the Connecting Europe Facility (CEF), signed in July 2018 between the Innovation and Networks Executive Agency (now CINEA) and the Ministry of Energy, Commerce, and Industry of the Republic of Cyprus.
- A €43 million equity contribution from the Electricity Authority of Cyprus.
- Long-term debt financing through the European Investment Bank (EIB) and the European Bank for Reconstruction and Development (EBRD), supported by a sovereign guarantee from the Republic of Cyprus.

4.6. Regulatory Framework

The project lies within the territory of an EU Member State and must be executed in compliance with all latest applicable European Union and Cypriot law, including but not limited to:

- The Pressure Equipment Directive (PED).
- The ATEX Directive on equipment for use in potentially explosive atmospheres.
- The Machinery Directive.
- The Seveso III Directive on the control of major-accident hazards.
- Directive (EU) on common rules for the internal markets in renewable and natural gases and in hydrogen.
- The Environmental Impact Assessment (EIA) framework arising from Directive 2011/92/EU as amended.
- All relevant Cypriot legislation and statutory permits, including those administered by the Cyprus Energy Regulatory Authority (CERA), the Department of Labour Inspection, and the Town Planning and Housing Department.

The new EPC Contractor will be responsible for ensuring that the completed works comply with all applicable directives, harmonised European standards, and Cypriot national requirements, including conformity-marking obligations for installed equipment. Tenderers will be requested to submit, with their bid, a comprehensive list of Codes, Standards & Regulations that will be used during the execution of the project.

5. PROJECT HISTORY AND CURRENT PHYSICAL STATUS

5.1. Prior Contracting Structure

Following an international tender published by DEFA in October 2018 on behalf of ETYFA, the project was awarded on 13 December 2019 to a consortium comprising China Petroleum Pipeline Engineering Co. Ltd, METRON S.A., Hudong-Zhonghua Shipbuilding Co. Ltd, and Wilhelmsen Ship Management Limited, under an Engineering, Procurement, Construction, Operation, and Maintenance Agreement (EPCOMA). The commencement date was September 2020, with a scheduled completion duration of 24 months. The Owner's Engineer for the duration of the EPCOMA was a joint arrangement between Hill International N.V. and Bureau Veritas Solutions Marine and Offshore SAS.

5.2. Termination and Current Contractual Position

The EPCOMA was terminated by ETYFA on 18 July 2024, and the previous contractor was removed from the Vasilikos site. The matter is the subject of ongoing international arbitration before the London Court of International Arbitration. ETYFA owns and manages the assets and intends to complete the LNG Import Terminal under a new EPC contract. No construction activity has been performed at the Vasilikos site since the departure of the former contractor.

5.3. Reported Physical Progress at the Date of EPCOMA Termination

The progress figures below are as reported by the previous contractor to ETYFA through the former EPCOMA progress reporting process. The figures are dated 22 December 2023 and represent the last formally reported overall progress position. No independent verification of construction progress has been carried out. The new EPC Contractor will be required to verify the actual state of all installed works as part of its mobilisation activities.

Section	Engineering	Procurement	Construction	Total
Onshore PRMS	—	—	—	92.76%
Onshore Buffer	—	—	—	100.00%
Onshore AGI and Pipeline	—	—	—	89.80%
Jetty	84.30%	69.76%	28.24%	50.34%
Vessel (FSRU)	—	—	—	99.82%

The reported overall project progress (not endorsed nor verified) at that date was approximately 79.75 per cent.

The new EPC Contractor will receive the assets in their as-found condition and will be responsible for satisfying itself as to the actual state of all works, equipment, and materials prior to taking ownership of the execution programme.

5.4. Current Site Condition

A multi-disciplinary site visit was undertaken by Technip Energies PMC between 14 and 18 July 2025, supported by an aerial drone survey, with reference to the site material register provided by ETYFA. The principal observations are summarised below.

Approximately 30 to 35 per cent of the procured project materials are present at site, distributed between a covered warehouse and adjacent open yards. Materials present include marine-structure components (piles, pile-cap reinforcement, mooring system items), the gas loading arms (SVT, Germany), main process vessels and heat exchangers (FORAIN, Italy), the mooring system (MAMPAEY, recently acquired by Trelleborg), pressure safety valves, motor-operated and emergency shutdown valves, electrical motors, heater-package cabling, and various piping items including 24-inch ball valves, monolithic insulating joints, flanges, and pipe fittings.

The condition of items stored inside the warehouse is generally good. Items stored externally are in variable condition: stainless and galvanised items remain serviceable in most cases; carbon-steel pipe and fittings exposed to the marine atmosphere are in early stages of corrosion; pile-plug reinforcement and pile-cap reinforcement stored externally have corroded to a degree that replacement is, on visual inspection, preferable to repair.

Verification of site preservation has not been performed against vendor preservation procedures, as vendor preservation specifications were not made available at the time of the site visit. A number of equipment guarantees may have expired.

Of 727 piles required for the jetty, 378 had been installed at the date of the kick-off meeting. Thirty-one precast crossheads had been installed on top of 31 piers offshore. The remaining precast crossheads are reported to be stored at Limassol port. Installed jetty piles carry 3LPE coating; corrosion-protection (Sea Shield 2000FD or equivalent) and welded anodes were not in place at the time of the survey.

Onshore, the cross-country buffer pipeline is partly fabricated and present along the routed corridor. Open ends were observed at manholes and at the buffer-zone entry and exit; internal-condition inspection has not

been performed since fabrication. Bedding and bunding support requires repair to comply with the design drawings.

The site elevation benchmark with respect to mean sea level was not located during the survey; it is recommended that the new EPC Contractor re-establish benchmarks early in mobilisation.

6. ENGINEERING AND DOCUMENTATION STATUS

6.1. Source Basis for Review

A high-level Cold-Eye Review of the engineering documentation was conducted by Technip Energies PMC, working from a Master Document Register provided by ETYFA dated 22 May 2025 and from the documents available on the project SharePoint server inherited from the previous contractor. A Reading Matrix was used to assess document availability, completeness, consistency, and technical adequacy.

6.2. Approach Taken on the Previous EPC

The project was awarded in December 2019 on the basis of a Functional Specification rather than a completed Front-End Engineering Design (FEED). Project specifications were therefore developed by the previous contractor during execution. No 3D model of the onshore or offshore facilities was developed. As a consequence, the new EPC Contractor will not inherit a FEED-quality reference baseline and cannot rely on a single, independently-verified design basis as the starting point for execution.

6.3. Documentation Availability

The Reading Matrix covered 1,196 documents across all engineering disciplines. The summary availability is set out below:

Discipline	Reviewed	Available	Not available
Civil	501	477	24
Piping and pipeline	111	100	11
Electrical	166	159	7
Instrumentation	149	137	12
Mechanical	66	61	5
Process	70	65	5
Process Safety	103	97	6
Quality	30	13	17
Total	1,196	1,109	87

While the headline availability is high, the review identified that documents present do not, in aggregate, constitute a fit-for-purpose design baseline. Specific findings are summarised in Section 9 of Identified Technical Gaps.

6.4. Vendor Data and Procurement Records

Vendor documentation, including vendor drawings, manufacturing record books, factory acceptance test reports, inspection test plans, certificates, and operating manuals, is not consistently available for the equipment delivered to site. Some equipment has been delivered without a declaration of conformity (CE marking); for some purchase orders, payments to vendors have been suspended. A dedicated vendor-data recovery exercise will form part of the new EPC Contractor's responsibilities.

6.5. Document Language

A subset of the inherited engineering documents is held in Greek only, including elements of the Environmental Impact Assessment, certain marine-environment plans (e.g. Marine Flora Impact Assessment and Mitigation Plan, Impact Management Plan with Special Reporting on Sediment Dispersion), parts of the lighting calculations, and the soil analysis. The project communication language is English. Translation of these documents will be required as part of the EPC scope, where the affected document is to be relied upon. During the execution of the project all project documentation shall be submitted in English. Some documents related to permitting activities will be required to be submitted to the local authorities in Greek too.

7. HAZOP AND SAFETY STATUS

7.1. Status of the Existing Safety Studies

The HAZOP and HAZID reports from the previous contractor are referenced in the project's Quantitative Risk Assessment but have not been located in the inherited documentation set in their close-out form. There is no evidence of a documented HAZOP/SIL/LOPA close-out for the onshore and offshore facilities. ETYFA has confirmed that the new EPC Contractor will be required to perform a new and updated HAZOP and HAZID for the onshore and offshore scope, with formal close-out of all actions before issue for construction.

A dispersion analysis covering the cold vent stacks at the AGI, PRMS, and Jetty, together with the mobile flare and the adjacent power station stacks, is not available in the inherited package. This study will be required.

A blast study and associated blast philosophy for the onshore and offshore facilities are not available.

7.2. FSRU Safety Design

ETYFA has confirmed that the safety reviews on the FSRU were carried out under the previous EPCOMA without ETYFA attendance. Post-HAZOP P&IDs of the FSRU were issued for construction without ETYFA approval. Safety responsibility for the FSRU, its certification, and its commissioning rests with the FSRU Operator (Wilhelmsen Ship Management) and is outside the scope of the new EPC Contract; the new EPC Contractor will be responsible only for HAZOP coordination at the FSRU/jetty interface and for commissioning coordination of that interface.

7.3. What the New EPC Contractor will be Required to Address

The new EPC Contractor will be responsible for, without limitation:

- Performance and close-out of an updated HAZOP, HAZID, SIL, and LOPA for all onshore and offshore facilities, with formal action close-out and documented audit trail.
- Performance of a P&ID review workshop prior to the commencement of detailed engineering.
- Preparation of 3D model and 30%, 60%, and 90% model reviews and related procedures, with formal close-out reports for each stage.
- Constructability review and constructability close-out report.
- Maintainability review and maintainability close-out report.
- Mechanical handling schedule and mechanical handling review.
- Human Factors Engineering (HFE) review and formal close-out report; final HFE review at site prior to handover.
- Performance of the dispersion analysis covering all cold vent stacks, the mobile flare, and the relevant adjacent power-station stacks.
- Performance of a blast study and the development of a blast philosophy for the onshore and offshore facilities.
- Update of the Quantitative Risk Assessment to reflect the closed-out HAZOP and the dispersion and blast study findings.
- Development and approval of an Emergency Safety Management system in coordination with the neighbouring operating facilities.

- Preparation of a permitting and regulatory compliance report confirming that all required statutory permits, authorisations, and regulatory filings are in place prior to handover.

The fully closed-out safety case and the permitting and regulatory compliance report together form a regulatory pre-condition for handover.

8. IDENTIFIED TECHNICAL GAPS

A high-level gap analysis has been completed by Technip Energies PMC. The findings summarised in this section are provided as an orientation tool to give potential Candidates an indication of the principal areas requiring attention. Additional information will be made available to pre-qualified Tenderers as part of the EPC ITB documentation.

The gap analysis provided in this Project Description and in the subsequent EPC ITB is not to be treated as a "rely-upon" document. It is a preliminary tool, prepared to help Candidates understand the general scope and nature of the work and to assist them in making a judgement as to their own capabilities to take on this project. The list of gaps identified is not exhaustive; further gaps may be identified at later stages of detailed engineering and will need to be addressed within the EPC Contract.

The tender will require Tenderers to carry out a comprehensive and independent review of all available project documentation, to satisfy themselves of the completeness and quality of the information provided, and to use that review as the basis for their cost and schedule estimates. The new EPC Contractor will bear full responsibility for the adequacy and completeness of the final design, irrespective of the content of any gap analysis made available during or prior to the tender process.

Mandatory Tender submission — Project Execution Plan. Tenderers will be required to submit, as a mandatory document with their bid, a full and complete Project Execution Plan. The Project Execution Plan shall demonstrate the Tenderer's comprehensive understanding of all tasks and activities described in this document and in the EPC ITB, including: the proposed implementation and review cycle for all engineering, procurement, and construction activities; the principal constraints identified by the Tender; proposed mitigations for those constraints; and the approach to managing the interface between inherited works, procured equipment, and new construction. Bids submitted without a compliant Project Execution Plan will not be considered.

8.1. Major Gaps (High Schedule and Commercial Impact)

The following items have been identified as having material impact on schedule, cost, or technical risk in the EPC phase. The table below is a high-level summary; full details will be provided in the EPC ITB documentation.

Area	Nature of gap	Principal impact
Process safety	HAZOP, HAZID, SIL, LOPA close-out reports for onshore and offshore not available; new updated studies required prior to IFC	Schedule, Technical Risk
Process safety	Dispersion analysis covering all cold vent stacks, mobile flare, and adjacent stacks not available	Schedule, Technical Risk
Process safety	Blast study and blast philosophy for onshore and offshore facilities not available	Schedule, Cost, Technical Risk
Process safety	Environmental Impact Assessment available in Greek only; translation and re-verification required	Schedule

Area	Nature of gap	Principal impact
Engineering basis	The previous EPC was awarded on the basis of a Functional Specification; no FEED-quality design basis exists for the project. The EPC Contractor is expected to comprehensively resolve all engineering gaps prior to the issue of any Purchase Order (PO); each PO must be supported by a formally approved Material Requisition. Where drawings or engineering documents are not available for equipment and materials already installed, the EPC Contractor is expected to prepare a complete set of as-built drawings and documents for the project record.	Cost, Technical Risk
Engineering deliverables	Native engineering files (stress analysis, 3D model, ETAP studies, process simulations) not available; the EPC Contractor will need to re-perform calculations and modelling from the existing documents	Schedule, Cost
Engineering deliverables	No 3D model of the onshore or offshore facilities exists; human-factor and maintainability checks have not been performed against a 3D baseline	Cost, Technical Risk
Vendor data	Manufacturing record books, Vendor drawings, factory acceptance test reports, inspection test plans, and operating manuals not consistently available for equipment delivered to site	Schedule, Cost, Technical Risk
Vendor data	Some delivered equipment lacks a declaration of conformity (CE mark); some vendor purchase orders have payments suspended	Cost, Technical Risk
Materials at site	Site preservation has not been validated against vendor preservation specifications; equipment guarantees may have expired	Cost, Technical Risk
Materials at site	External-stored carbon-steel pipe and fittings showing surface corrosion; certain pile-plug and pile-cap reinforcement is corroded to a degree that replacement is preferable to repair	Cost
Marine works	Installed jetty piles carry 3LPE coating only; corrosion-protection system per project specification and welded anodes are not in place; condition assessment required	Cost, Technical Risk
Marine works	Installed precast crossheads on the offshore jetty exhibit signs of reinforcement corrosion in the marine atmosphere; condition assessment required	Cost, Technical Risk

Area	Nature of gap	Principal impact
Civil/structural	Top bays of pipe rack structures not braced longitudinally and transversely; weld-size used in steel detailing below standard 6 mm minimum; structural-analysis input files not available; verification required, road to trestle interface bridge not available.	Cost, Schedule
Civil/structural	Catwalk structures connecting dolphin structures designed for in-service conditions only; transport and installation conditions not verified	Schedule, Technical Risk
Mechanical	Design-life inconsistency between Mechanical Basis of Design (25 years) and Material Requisitions for vessels and packages (40 years) — to be resolved	Cost, Technical Risk
Mechanical	Mobile flare Material Requisition specifies a sterile radius of 15 metres without alignment to API 521; the correct standard must be applied	Technical Risk
Mechanical	Equipment Datasheets, Specifications, or Material Requisitions missing for several items; vendor drawings for the gas loading arms not available, preventing maintenance space verification at the jetty	Schedule, Cost
Electrical	MV switchgear scope mismatch between Material Requisition and Single Line Diagrams; data sheets missing for MV switchgear, dry-type transformers, LV distribution boards, cabling, lighting, and small power	Cost, Schedule
Electrical	AC and DC UPS using common battery banks rather than separate banks; temperature correction factor applied at 20°C rather than the minimum room temperature	Technical Risk
Electrical	Power system studies, harmonic study, transformer energization study, and relay coordination not performed against vendor data	Schedule, Technical Risk
Instrumentation	Instrument list covers field hardwired tags only; soft tags are not consolidated; discrepancies observed between PSV packing list, datasheets, and P&IDs	Cost, Technical Risk
Instrumentation	Cybersecurity report and design basis for telecommunication and security systems not available	Schedule, Technical Risk

Area	Nature of gap	Principal impact
Process	Material Selection Report and Diagram, Utility Consumption Summary, Effluent and Emissions Summary not available	Schedule, Cost
Quality	Inspection and Test Plans, Construction Quality Control Plan, ISO certifications for major contractor and subcontractors, and site QA/QC reports not available	Schedule, Cost

8.2. Minor Gaps

A range of further gaps has been identified that are characterised as manageable within normal EPC execution and are not, individually, expected to drive material schedule or cost impact. These include items such as missing bills of quantities on individual drawings, inconsistencies in document formatting and revision dating, missing reference-document attachments to specific technical notes, locally untranslated annexes, drawing details for minor onshore civil features, and the absence of certain soil-resistivity values used in cathodic-protection calculations. These will be resolved within the normal course of the EPC Contractor's supplementary engineering deliverables.

8.3. Scope of Gap Closure — EPC Contractor Obligations

The new EPC Contractor's scope will explicitly include, without limitation:

- The closure of all gaps identified in this Project Description and in the EPC ITB documentation.
- The comprehensive review, verification, and validation of all inherited engineering data, physical equipment, and installed works.
- The resolution of identified design discrepancies, including the equipment design-life inconsistency noted in Section 9.1.
- The resolution of any deviation or inconsistency identified between the inherited engineering package and applicable EU regulations and directives, Cypriot national law and regulations, and applicable engineering standards and codes.
- The completion of any supplementary engineering necessary to deliver a fully fit-for-purpose, Issue for Construction (IFC) grade design package.
- The preparation of as-built drawings and documents for all installed works where the corresponding engineering record is absent or incomplete.
- Independently engage an inspection agency to evaluate the condition of the installations and perform any necessary repair, refurbishment, dismantling, and reinstallation.
- Assess the status of the procurement and provide a detailed remediation and execution strategy plan to complete the works
- Provide full support for all permitting-related activities to ensure the plant and its operation complies with EU and Cypriot legislation.
- Complete the fabrication, erection, construction, and commissioning of the plant, start-up and performance guarantee.

The gaps listed in this Project Description and in the EPC ITB are not exhaustive. Additional gaps may emerge during detailed engineering; these will be within the EPC Contractor's scope to identify and resolve. The gap analysis is provided as a preliminary orientation tool and must not be treated as a complete or definitive statement of the supplementary work required.

ETYFA will provide a question-and-answer mechanism during the tender period to enable Tenderers to raise clarifications.

9. UNKNOWNNS AND TENDERER CONSIDERATIONS

9.1. Items that Cannot be Fully Resolved Before Tender

A number of items will remain partially unresolved at the date of issue of the Invitation to Bid. The new EPC Contractor will be expected to allow for these in the technical proposal.

- **As-built condition of installed civil and marine works.** Detailed condition assessment of the installed jetty piles, precast crossheads, and onshore buffer-zone pipework will be required during the EPC phase. Tenderers should expect to undertake comprehensive non-destructive examination and structural verification as part of their mobilisation programme.
- **Buried works.** The condition of buried sections of the onshore pipeline and the buffer storage piping has not been verified internally since fabrication. Tenderers should allow for inspection and remediation as necessary.
- **Subcontractor interface history.** The previous EPCOMA was executed through a chain of subcontractors. Records of subcontracted work and associated quality records may be incomplete. Where full and compliant records cannot be recovered, the new EPC Contractor should assume that a new, fresh purchase order will be required for the affected scope. Tenderers should also be aware that, vendors and subcontractors previously associated with the project may not be willing to engage with the new EPC Contractor; this possibility should be factored into the bid.
- **Vendor relationships.** Some vendors have been acquired by other entities since contract placement (for example, MAMPAEY by Trelleborg). Tenderers should anticipate engaging with successor entities to recover documentation and to address warranty matters.
- **Market and procurement environment.** Long-lead equipment market conditions have evolved since the original procurement; Tenderers will be expected to verify availability and lead times for any items being relied upon.

9.2. Investigations Tenderers are recommended to Undertake

Within the limits of the tender process (hence after the ITB is published), Tenderers are recommended to consider:

- Independent visual review of the Vasilikos site, including the warehouse, the open storage yards, and the installed works (jetty, buffer zone, onshore pipeline).
- Independent review of the inherited engineering package against Tenderers' own internal completeness criteria for an LNG terminal of this type.

Engagement with the equipment vendors to assess data-recovery prospects and equipment fitness-for-purpose, in particular for the gas loading arms (SVT), the mooring system (MAMPAEY/Trelleborg), the heat exchangers and process vessels (FORAIN), the marine berthing approach system, and the major valves.

9.3. Communication with Candidates

All communication and queries from and to Candidates will be managed exclusively through the Republic of Cyprus public procurement e-procurement portal. There will be no direct communication between Candidates and PMC or ETYFA at any stage unless separately and explicitly agreed in writing with ETYFA.

Site-visit arrangements will be communicated to Candidates directly by ETYFA.

10. REGULATORY AND COMPLIANCE CONSIDERATIONS

10.1. Applicable EU Regulatory Framework

The project, located within the territory of an EU Member State, is subject to the full corpus of applicable EU law. Tenderers shall expect, without limitation, the following directives and regulations (as a minimum) to apply to the design, manufacture, installation, commissioning, and operation of the works:

- Pressure Equipment Directive, with conformity assessment of all pressure-bearing equipment in accordance with the relevant module.
- ATEX Directive on equipment intended for use in potentially explosive atmospheres, and Directive on minimum requirements for the protection of workers in such atmospheres.

- Machinery Directive.
- Seveso III Directive on the control of major-accident hazards involving dangerous substances.
- Directive (EU) 2024/1788 establishing common rules for the internal markets in renewable and natural gases and in hydrogen.
- The Environmental Impact Assessment regime under Directive 2011/92/EU as amended.
- Construction Products Regulation.
- Electromagnetic Compatibility Directive and Low Voltage Directive.

All harmonised European standards relevant to LNG receiving terminals (including EN 1473, EN 1474 series, and the relevant EN ISO codes for piping and equipment) are applicable. Tenderers shall propose a documented list of standards, applicable rules and regulations in the technical bid.

10.2. Cypriot National Framework

The project is subject to all applicable Cypriot national regulations, statutory permits, and the conditions attaching to permits already issued, including those administered by:

- The Cyprus Energy Regulatory Authority (CERA).
- The Department of Labour Inspection (Ministry of Labour and Social Insurance).
- The Town Planning and Housing Department.
- The Department of Environment.
- The Public Works Department.
- The Department of Land and Surveys.
- Distribution System Operator (DSO) of Cyprus
- Electricity Authority of Cyprus (EAC)
- The Department of Civil Aviation of the Republic of Cyprus, as the relevant authority for any aerial survey or drone operations conducted in connection with site investigations or construction activities.

Existing environmental monitoring programmes (soil, air quality, noise, marine water quality, sediment and benthic monitoring, underwater noise, and Posidonia Oceanica monitoring) are in place and will be continued by the project. Compliance with the Environmental Monitoring Plan will form part of the EPC Contractor's site execution responsibilities.

10.3. Candidate Eligibility

In accordance with the tender documentation, eligible participants are natural or legal persons (governed by public or private law) or consortia of natural and/or legal persons lawfully established in the Republic of Cyprus, in any other Member State of the European Union or of the European Economic Area, or in third countries that have signed and ratified the International Government Procurement Agreement (GPA) or that have signed and ratified an association or bilateral agreement with the European Union or the Republic of Cyprus in the sector of public procurement.

The new EPC Contractor must demonstrate previous experience in the successfully executed design, procurement, and construction of projects of similar nature and complexity within the European Union. Candidates will be required to provide, for each reference project submitted, the name and contact details of a reference entity that ETYFA may contact directly to verify the quality and performance of the work delivered. Submission of a reference shall constitute the Candidate's agreement that ETYFA may approach the referenced entity for verification purposes.

Candidates wishing to participate in the tender process must execute a Non-Disclosure Agreement (NDA) before receiving the full ITB documentation package. The form of NDA will be provided by ETYFA. Participation in the process constitutes acceptance of the NDA obligation.

10.4. Compliance Responsibility

Compliance of the completed works with all applicable European and Cypriot legislation, including conformity assessment and CE marking obligations, ongoing operational permits, and statutory testing and inspection regimes, rests with the new EPC Contractor. Existing equipment delivered to site that does not carry a valid declaration of conformity will need to be addressed within the EPC Contractor's compliance methodology.

11. PRE-QUALIFICATION AND NEXT STEPS

This Project Description is issued together with the Pre-Qualification Questionnaire (PQQ). The two documents are to be read together. Interested Candidates are required to complete and return the PQQ in accordance with the submission instructions provided by ETYFA.

The full EPC Invitation to Bid (ITB) documentation will be made available to pre-qualified Tenderers at the time of ITB issue.

Should any query arise during the preparation of the PQQ, the Candidate is invited to follow the public procurement procedures provided in the Public Procurement Portal [<https://www.eprocurement.gov.cy/epps/home.do>].