### Document Title:
**Greek Preliminary Impact Assessment**
**Annex IV: Stakeholder Engagement Plan (SEP)**
**– PEIA**

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1 INTRODUCTION

1.1 Context of the document

This document is the Stakeholder Engagement Plan (SEP) for the Greek section of the proposed Trans Adriatic Pipeline (TAP) (hereinafter ‘the project’). This SEP (Greece) was been initially prepared during the route selection and scoping phase of the project and details the stakeholder engagement process to be undertaken by TAP in Greece throughout the duration of project.

This SEP (Greece) seeks to define a technically and culturally appropriate approach to consultation and disclosure (see Box 1.1). The main goals are to ensure that adequate and timely information is provided to project-affected people and other stakeholders, that these groups are given sufficient opportunity to voice their opinions and concerns and that these concerns influence project decisions.

This SEP (Greece) focuses on consultation and disclosure activities during the Environmental and Social Impact Assessment (ESIA) of the TAP project in Greece, but it is noted that this takes part in the context of a wider process of stakeholder engagement that TAP will take forward through project planning, construction, operation and decommissioning. A SEP is a living document, which will be regularly updated during and after each project phase. The engagement undertaken during the initial phases will be used to define engagement during the later stages of the project.

Box 1.1 Stakeholder Engagement

Stakeholder engagement refers to a process of sharing information and knowledge, seeking to understand the concerns of others and building relationships based on collaboration. Stakeholder consultation and disclosure are key elements of engagement and essential for delivery of projects.

Consultation is understood as an inclusive and culturally appropriate process, aimed at providing stakeholders with opportunities to express their views, so that these can be taken into consideration during the decision making process. Effective consultation requires the prior disclosure of relevant and adequate project information to enable stakeholders to understand the risks, impacts and opportunities of the project.

This version of the SEP (Greece) was last updated in April 2011 after completion of the Phase 2 stakeholder engagement activities (Route Refinement and Scoping phase).

The following Table 1.1 summarises the phases of stakeholder engagement and progress to date.
Table 1.1  Phases of the SEP Greece and Progress to Date

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1.2 Purpose of this Plan

TAP is committed, in addition to full compliance with all Greek EIA Regulations, to comply with the Performance Requirements of the European Bank of Reconstruction and Development (EBRD), as well as any other directly relevant policies of the IFC and World Bank. With regard to stakeholder engagement, these requirements are reflected in this SEP (Greece).

The purpose of this SEP (Greece) is to ensure that a consistent, comprehensive, coordinated and culturally appropriate approach is taken for consultation and project disclosure in Greece. This SEP (Greece) is fully aligned with the aims of the TAP Stakeholder Engagement Strategy, i.e. to ensure free, prior and informed consultation of the affected communities though the realisation of an inclusive and culturally appropriate process of stakeholder engagement which is early, on-going and iterative throughout the project lifetime.

The primary goals of the Plan are to:

- describe the general requirements for consultation and disclosure;
- identify specific requirements, expectations and preferences of key stakeholders (affected parties, authorities, NGOs) with particular attention to the needs of vulnerable populations;
- provide a strategy and timetable for sharing information and consulting with each of these groups during the various phases;
- document TAP’s resources and responsibilities for implementing activities and provide contact information at all levels and on all subjects;
- detail reporting/documentation of consultation and disclosure activities;
- agree on monitoring and evaluation processes; and
- outline the grievance/complaint mechanisms for the Project in Greece.
1.3 Structure of this Plan

This Plan is organised in the following subsequent sections:

- **Section 2**: National and International Regulations and Best Practice
- **Section 3**: Stakeholder Identification and Analysis
- **Section 4**: ESIA Stakeholder Engagement Plan
- **Section 5**: Timetable of Activities
- **Section 6**: Resources and Responsibilities
- **Section 7**: Grievance Mechanism
- **Section 8**: Monitoring and Reporting

The main body of information which will require regular update is held within Annexes A-H, as listed below:

**Stakeholder Engagement General Tools**

- **Annex A**: Grievance Reporting Form
- **Annex B**: Minutes of Meeting Format

**Stakeholder Engagement Phase Reports (to be annexed to the final ESIA SEP):**

- **Annex C**: Phase 1 Pre-Scoping Stakeholder Engagement
- **Annex D**: Phase 2 Route Refinement Stakeholder Engagement
- **Annex E**: Phase 3 Scoping Stakeholder Engagement
- **Annex F**: Phase 4 ESIA Stakeholder Engagement
- **Annex G**: Phase 5 ESIA Finalisation and Disclosure Stakeholder Engagement
- **Annex H**: Phase 6 Ongoing Engagement Stakeholder Engagement

A stakeholder database has been developed by the project which is populated with up-to-date listings of stakeholders, engagement activities and key issues of interest to stakeholders including grievances received and addressed by the project.
2 National and International Regulations and Best practice

2.1 National Requirements for Public Consultation

2.1.1 Provisions for Public Consultation in the Greek ESIA Process

Public consultation during the ESIA process in Greece is based on Law 3010/2002 on harmonization of L.1650/1986 with Directives 97/11/EC and 96/61/EC.

According to the law, the process of Environmental Impact Assessment (EIA) in Greece is carried out in the following two phases:

- Preliminary Environmental Impact Assessment (PEIA); and
- Environmental Impact Assessment (EIA)

A Special Environmental Authority within the Ministry of Environment, Energy and Climate Change (EYPE/YPEKA) is in charge of both phases of the EIA process.

Consultation during the PEIA phase is limited to national public authorities. The PEIA Study is submitted to the Special Environmental Authority (EYPE/YPEKA) for consideration. Before issuing the PEIA permit, the Authority asks for the opinion of other national authorities such as Ministry of Defence, Ministry of Culture, Ministry of Foreign Affairs, other departments within the Ministry of Environment (e.g. Department of Environmental Planning, Forest Directorate) etc. and of the Planning Departments of the Regions involved (in order to check possible interference with territorial plans and urban plans).

During the EIA phase, when the EIA is complete but prior to approval, the study is submitted to the regions involved and is subject to public disclosure. One public disclosure meeting is organised in each region.
2.2 Performance Requirement of the European Bank for Reconstruction and Development (EBRD)

TAP has decided to use the Performance Requirement of the European Bank for Reconstruction and Development (EBRD) as a benchmark for the Environmental and Social Impact Assessment Process.

EBRD Performance Requirement 10 focuses on Information Disclosure and Stakeholder Engagement and has the following objectives:

- To identify people or communities that are or could be affected by the project, as well as other interested parties.
- To ensure that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation.
- To maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation.

The EBRD PR10 requires that during project preparation stakeholders are identified and analysed and that a stakeholder engagement plan is prepared.

Resources for public information and engagement should focus on affected parties with a particular attention to those that may be differentially affected by the project because of their disadvantaged or vulnerable status.

The EBRD PR10 requires consultation to be meaningful, meaning that it:

- is based on the disclosure of relevant and adequate information including draft documents and plans, to allow comment prior to decisions being taken when options are still open;
- begins early in the environmental and social appraisal process;
- focuses on the social and environmental risks and adverse impacts, and the proposed measures and actions to address these; and
- is carried out on an ongoing basis as the nature of issues, impacts and opportunities evolve.

The EBRD PR10 requires that engagement continues during project implementation and that a grievance mechanism is established to receive and facilitate resolution of stakeholders’ concerns and grievances.
2.3 UN Economic Commission for Europe (UNECE) Aarhus Convention

The Aarhus Convention on Access to information, public participation in decision-making and access to justice in environmental matters came into force in 1998 and links environmental rights and human rights and is based on the belief that it is a basic right of present and future generations to live in an environment adequate to health and wellbeing. The convention is focused on achieving this through the implementation of three pillars: rights of access to information, access to decision-making, and access to justice.

Public participation in decision-making is fundamental in the Convention. The term public participation is not explicitly defined, but involves the activity of members of the public working in partnership with public authorities to reach an optimal result in decision-making and policy-making. A minimum requirement of this is to ensure effective notice, supply of adequate information, proper procedures, and appropriate taking account of the outcome of public participation. The level of involvement of the public in a particular process depends on a number of factors, including the expected outcome, its scope, who and how many will be affected, whether the result settles matters on a national, region or local level, and so on. The Convention states that public participation should be timely, effective, adequate and formal, and contain information, notification, dialogue, consideration and response. Box 2.1 sets out Article 6 of the convention, which relates to specific project activities and is relevant to the TAP project.

Box 2.1 Public Participation Requirements under Article 6 of the Aarhus Convention

| Article 6: Public Participation in Decisions on Specific Activities. |
| Article 6 concerns public participation in decision-making by public authorities on whether to permit or license specific activities. The Convention recognizes that people have the right to take part in basic decisions affecting their lives. It also recognises that the quality of these decisions can be improved through the active involvement of the public. |

| Article 6, paragraph 1: Requires Parties to guarantee public participation in decision-making for projects with a potentially significant environmental impact. |
| Article 6, paragraph 2: Sets requirements for notifying the public concerned about the decision making. |
| Article 6, paragraph 3: Sets time-frames for public participation procedures within a decision making process. Specific time limits must be established, which must provide enough time for notification, preparation and effective participation by the public. |
| Article 6, paragraph 4: Requires that public participation take place early in decision-making. |
| Article 6, paragraph 5: Encourages exchange of information between permit applicants and the public. |
| Article 6, paragraph 6: Requires public authorities to provide the public concerned with access to all information relevant to the decision-making. |
| Article 6, paragraph 7: Contains procedures for public participation. |
| Article 6, paragraph 8: Parties must ensure that decision takes due account of public participation. |
| Article 6, paragraph 9: Public must be informed of final decision. |
| Article 6, paragraph 10: Public participation is required if activities are reconsidered or changed. |
2.4 UN Convention on Environmental Impact Assessment (EIA) in a Transboundary Context – The Espoo Convention

The UN Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) stipulates the obligations of contracting countries (referred to as ‘Parties’) to assess the transboundary environmental impacts of a project at an early stage of planning. The main objective of the Convention is to “promote environmentally sound economic development, through the application of environmental impact assessment, especially as a preventative measure against transboundary environmental degradation”. The Convention also lays down the general obligation of States to notify and consult each other on whether a project on their territory is likely to have a significant adverse transboundary environmental impact.

It is important to recognize that the disclosure of information and the engagement with stakeholders is between governments and government agencies and the public and not between the project developer and the public. However parties of origin can ask the developer to undertake public consultation above and beyond their normal EIA requirements and the developer may also be asked to undertake public consultation in affected parties. Parties of origin and affected parties and their identification for the TAP project are defined in Table 2.1. As shown, for the TAP project, Affected Parties correspond to Parties of Origin.

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<td>(Parties under whose jurisdiction a proposed activity is envisaged to take place)</td>
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<tr>
<td>Affected Parties</td>
<td>Albania, Greece and Italy</td>
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<tr>
<td>(Parties likely to be affected by the transboundary impact of a proposed activity)</td>
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The parties of origin for TAP project (Albania, Greece and Italy) have ratified the Espoo Convention.

Key steps that need to be followed under the Espoo Convention are:

- screening (by the parties of origin) to assess if a transboundary EIA is mandatory under the convention;
- notification by parties of origin to each other and to affected parties of the start of the Espoo Process;
- exchange of project information between all parties;
- first round of public and inter-party consultation;
- preparation of EIA documentation;
- second round of consultation;
- distribution of EIA documentation;
- consultation among the Parties; and
- final decision.

The Espoo Convention guidance suggests how the public should be involved in the transboundary EIA process. It recommends that public participation should be considered as one of the most important elements in a transboundary EIA and goes on to recommend responsibilities and requirements for the involvement of the public in the process (see Box 2.2).

**Box 2.2 Public Consultation in the Espoo Convention**

Best practice public consultation under the Espoo Convention (UN/ECE guidance on Public Participation in the Environmental Impact Assessment in a Transboundary Context, 2006) includes (but is not limited to):

**Participation of the public:**
- The parties of origin should support participation of its own public, as well as the public of the affected parties (Art. 2/6).
- The Affected Parties should support participation of its own public and where necessary carry out the procedures of the parties of origin (Art. 3/8).

**Opportunities for comment:**
- The opportunities given to the public of the Affected Parties must be equivalent to those provided to the public in the parties of origin (Parties of Origin and Affected Parties responsibility, Art. 3.8).

**Translation of documents:**
- The parties of origin are responsible for translating and distributing all relevant documentation (Art. 4/2).

**Collection of comments:**
- The affected parties are responsible for their collection, their analysis and their submission to the parties of origin (Appendix VI/e).

**Preparing the decision:**
- The parties shall ensure that, in the final decision on the proposed activity, due account is taken of the comments thereon received on the transboundary EIA. The parties of origin would then prepare the text of the decision, along with the main reasons and considerations on which the decision is based, and make this accessible to the public (Art. 6/1).

**Raising awareness amongst affected public:**
- Both the parties of origin and the affected parties should promote environmental education and training for the general public, specified target groups and competent authorities (Art. 9).
2.5 TAP Standards for Stakeholder Engagement

TAP considers effective stakeholder engagement to be an essential part of good business practices and central to the successful management of project risks, impacts and local benefits. The objective is to earn the stakeholders' trust and establish a two-way dialog throughout planning, construction, operation and decommissioning. TAP is committed to implementing a process of stakeholder engagement which is line with international best practice, with EBRD Performance Requirement 10 being a focus benchmark.

To assure an effective and meaningful stakeholder engagement, TAP promotes:

a) awareness and understanding of TAP’s policies, strategies and activities;
b) sharing and exchange of knowledge and lessons learned;
c) participatory communication (i.e. an open two-way flow of information);
d) transparency; and
e) accountability.

While full disclosure is not always possible for legal, practical and economical reasons, TAP respects the right of people to seek, receive, and impart information about all activities undertaken by TAP. To encourage constructive debates and dialogues, improve performance and establish mutual trust, TAP is committed to proactively share all non-confidential knowledge and information - whether positive or negative - with the stakeholders and the public at large.

Furthermore, as a foundation to the realisation of a technically and culturally appropriate approach to consultation and disclosure iterative, TAP has committed to take forward the following specific activities:

- Identify individuals, households, communities and other entities that may be affected by the pipeline system as well as other stakeholders who have an interest in TAP, its impacts, benefits and opportunities (regulative bodies, local governments, NGOs, companies, etc).
- Engage with these stakeholders in a dialog on social, environmental, safety, security and other relevant issues through regular, free, prior and informed consultations.
- Pay particular attention to disadvantaged, marginalised, vulnerable and/or poor populations and tailor the consultation process around their preferences.
- Enter into good faith negotiations that satisfy the interest of all parties on controversial and complex issues.
- Disclose all non-confidential information through its webpage.
• Disclose all information related to environmental and social impacts, health and safety hazards and emergency management at local level in local languages and in a manner that is accessible, understandable and culturally appropriate.

• Involve directly affected stakeholders into the monitoring of impacts, mitigation measures and benefits and/or report back to stakeholders on the environmental and social performance when external monitors are used to enhance transparency and credibility.

• Establish an accessible grievance redress mechanism to address and potentially solve grievances, complaints and reports of non-compliance in a timely, impartial and transparent manner.

The above mentioned principles and commitments are articulated in internal strategic and procedural documents including the following:

• Communication Strategy (TAP-EXT-ST-0001).

• Overall Stakeholder Engagement Strategy (TAP-EXT-ST-0006).

• Strategy for the Engagement with ESIA Stakeholders (TAP-HSE-ST-0004).

• Third Party Grievance Mechanism for Pre-Construction Phase (TAP-EXT-MA-0001).

2.6 TAP Code of Conduct

Prior to undertaking any engagement activities, all direct TAP employees and subcontractors will undertake the TAP Code of Conduct Training. This training is designed to ensure that all TAP representatives are skilled in identifying and managing risks posed to TAP from corruption.

Paragraph 2.3 of the Code of Conduct deals with Combating Corruption and specifically states that TAP are opposed to “facilitation payments”, even where they are legal and is committed to avoiding them as part of the company’s business activities.

The TAP team will be engaging with the regional and local authorities and require assistance from them when visiting settlements along the different pipeline route options.

TAP and its representatives will continue to uphold all commitments made in the Code of Conduct.
3 Stakeholder Identification and Analysis

3.1 Stakeholder Identification

For the purposes of this plan and according to EBRD Performance Requirements (PR 10, point 8) stakeholders are individuals or groups that are affected or likely to be affected (both directly and indirectly) by the project ("affected parties") or that may have an interest in the project ("other interested parties").

The objective of stakeholder identification is therefore to establish which organizations and individuals may be directly or indirectly affected (positively and negatively) by the project. The process also aims to identify which stakeholder may have an interest and/or a positive or negative impact or influence on the project.

Stakeholder identification and mapping was initiated during the project planning phase of the TAP project and will be regularly reviewed and updated throughout the lifetime of the project. The categories of stakeholders and their level of engagement at each stage of the development of the project are listed in Annex V of the main PEIA report. The detailed list of groups consulted during each phase will be reported in the phase-specific documents Annexes C onwards (to be appended to the SEP in the ESIA phase).

3.2 Stakeholder Analysis

In order to develop an effective SEP it is necessary to identify stakeholders and understand their priorities and objectives in relation to the project. By identifying stakeholders it is possible to develop a plan that is tailored to the needs of different stakeholder groups.

Recognising the strategic importance of the project, a diverse range of stakeholders have been identified that could be involved in the engagement process. Different issues are likely to concern different stakeholders and so different types of stakeholder have been grouped based on their connections to the project (see Annex V). Having an understanding of the connections of a stakeholder group to the project helps identify the key objectives of engagement.

Different stakeholders have different needs for information and levels of interest in engaging with the project. Different stakeholder groups will also require different engagement approaches depending on their socio-cultural characteristics. Furthermore, stakeholders and their level of interest and/or connection to the project often change over time through the development phases of the project. To ensure that the engagement approach for each stakeholder group is appropriate, stakeholders are analysed through a stakeholder mapping exercise prior to
developing the detailed consultation plan for each phase of engagement. This analysis is documented in the Annexes for the specific project phases (to be appended to the SEP for the full ESIA phase report).

4 Stakeholder Engagement plan

4.1 Methodology

The following elements were considered in the preparation of this SEP:

- **Geographic context**: The number of Regions and Municipalities involved in the assessment during the different project stages and the distances between these will determine to a large extent the number of meetings and methodologies proposed.

- **Stage of the project**: The scope of consultation and disclosure activities will be defined according to the needs of each stage of the project. For example not all communities located along the pipeline route will be consulted with during the initial phases of the project as it is considered necessary to design the consultation process such that expectations and / or apprehension at the community level are not unnecessarily raised.

- **Level of activity on the ground**: It is recognized that there will be a number of specialists undertaking activities in the local areas throughout the different project phases. It is necessary to ensure that the relevant authorities are aware and supportive of these activities.

- **Range of stakeholder groups**: As previously discussed, engagement needs to be tailored to the needs and interests of different stakeholder groups taking account of language preferences, decision making processes and the needs of any disadvantaged or vulnerable groups.

- **Compliance with relevant standards**: The scope of the engagement to be proposed at each stage of the project will ensure compliance with legal requirements, EBRD standards and TAP’s corporate requirements.

Detailed information on the methodology used for each phase of the project is presented with the detailed stakeholder plan and relevant stakeholders in Annexes C-H (to be appended to the SEP in the full ESIA report).
4.2 Phases of Engagement Activities

For the purposes of this project, the ESIA Engagement Plan has been divided into five phases, each having slightly different objectives for consultation. These six phases are:

- **Phase 1: Pre-Scoping.** This Phase has been completed and consisted of high level strategic engagement with government departments and key informant groups, in order to provide information about the project, gauge its viability and identify any key issues early.

- **Phase 2: Route Refinement:** The overall objective of stakeholder engagement during the pipeline route selection process was to identify sensitivities that needed to be taken into account when selecting the preferred route. During this phase the Project was introduced to national, regional and local authorities and a sample of potentially affected communities, to gather baseline information and identify any key issues and sensitivities such as sites of interest, presence of vulnerable groups etc. Consultation was undertaken between October 2010 and March 2011.

- **Phase 3: Scoping Consultation.** Scoping disclosure and consultation was carried out in June-July 2011 in order to inform stakeholders about the route selection and project design and to understand any issues which may inform the ESIA Terms of Reference and the development of mitigation measures for the project. During this phase TAP meet with national, regional, municipal and heads of local communities as well as NGOs in the Project Area and in Athens. Scoping involved revisiting the government and NGO stakeholders previously engaged during the route selection process at a national, regional and municipal level along with representatives, of local communities of the 11 municipalities crossed by the 2km corridor of the proposed pipeline route.

- **Phase 4: ESIA Consultation.** The Project will continue to engage national, regional and municipal stakeholders as well as NGOs. Additionally, alongside social baseline data collection, the Project will hold ESIA consultation meetings in each village with land inside the 2km pipeline corridor. All stakeholders will be provided with a project update and an opportunity to comment, express any concerns and discuss issues. All feedback related to potential impacts of the Project will be considered in the ESIA and the manner in which this feedback influences the ESIA will be documented. The project team will also ensure that stakeholders are familiar with the grievance mechanism and provided with information on the next phases of the project.

- **Phase 5: ESIA Report Disclosure and Consultation.** Once the draft ESIA has been completed it will be publicly disclosed and engagement activities will be organised to present the findings of the ESIA and receive comments and suggestions. The disclosure and consultation will be organised at the national, regional and local level under the supervision of
the Ministry of Environment, Energy and Climate Change (MEECC), Forests and Water Administration and the Regional Environmental Agencies. All administrative levels from regional to village representatives will be engaged as well as the local communities, NGOs and other interested parties.

- 30 days after the notification and disclosure of the ESIA report, TAP will hold public hearings (dates and locations will be identified and disclosed). The notification of the public hearings will be announced through the media and the hearings will be open to the public. Comments and suggestions made during the public hearings will be considered in the final ESIA report.

- **Phase 6: Ongoing Engagement.** TAP will continue to engage with stakeholders throughout the project lifecycle. The methodology for this will be developed and finalised using the information compiled during the ESIA process.

There is no dedicated Stakeholder Engagement phase for the PEIA. The PEIA was compiled following the ESIA Scoping Report, filling a similar role in the ESIA process but meeting the specific requirements of Greek environmental legislation. The Scoping Consultation Phase (Phase 4) incorporated minor updates to the project design, route and potential impacts outlined in the PEIA into the consultation process, to ensure that stakeholders had the most up-to-date information to feed back on. An additional dedicated PEIA consultation phase was thus not considered meaningful as it would provide no additional information to stakeholders and could potentially lead to concerns regarding ‘stakeholder fatigue.’

*Annexes C-H (to be appended to the SEP in the full ESIA report) will provide detailed information on the engagement methodology, stakeholder engagement plan and stakeholders to be engaged with during each project phase.*

These annexes are designed to be stand alone documents, which will be used firstly as a guide for engagement activities and then to document the engagement activities completed during each project phase.
5 Resources and responsibilities

Stakeholder engagement is an integral element of TAP’s core business activities and is managed according to the same principles of all other business functions: with clearly defined objectives and targets, professional, dedicated staff, established timelines and budgets, responsibility, accountability and oversight. TAP recognises the importance of dedicating appropriate resources to the engagement process and establishing clear lines of responsibility.

To ensure that this process is in line with best practice TAP has established for the planning phase the “Engagement Strategy for ESIA Stakeholders” (TAP-HSE-ST-0004) which contains the following guidance to the management of TAP’s engagement process with ESIA Stakeholders.

**Overall responsibility and coordination is based on clear reporting lines:** During the lifespan of the pipeline system (< 50 years) affected communities and other interested parties will interact with a variety of representatives from TAP and its contractors. Consistency of information conveyed to stakeholders by different teams and keeping track of such activities is important in order to reduce inefficiencies, confusion, and conflicting messages or commitments.

During the planning phase most stakeholder engagement will be linked in one way or the other to a) the Pipeline Route Refinement Process, b) the Environmental and Social Impact Assessments, c) the Acquisitions of Land and Easement and d) Social and Environmental Investments. Consequently, TAP entrusts the overall responsibility for the engagement process with ESIA stakeholders to its ESIA Manager.

In the day to day work, stakeholder engagement and consultations are triggered by the various processes mentioned above and will be scheduled and planned based on the action plans for these processes. To assure harmonization, the ESIA Manager needs to be informed upfront of any consultations or structured engagement with ESIA stakeholders to coordinate the processes, to assure that the messages are harmonized and to facilitate TAP’s participation in this process.

**Structure the work around a commitments register:** TAP is fully committed to accountability in the stakeholder engagement process as this is essential when it comes to building and establishing good working relationships with stakeholders. Timely follow-through requires keeping track of the various commitments made to stakeholder groups (affected parties, authorities, other interested parties, shareholders, lenders, or other organizations) over the lifespan of the project. Typically, the number of commitments made to stakeholders is highest in the early phases. TAP will use a commitments register to record and follow up on TAP’s many environmental and social commitments made during the consultation process and contained in
the various environmental and social assessment documentation and action plans. It will contain timeframes for action and assign responsibility to the appropriate individuals, departments or implementing third party (which in some cases may be the contractor, an NGO or local government agency).

*Stay in control of third-party engagement:* TAP staff will be present during all engagements with stakeholders, in particular with authorities, to ensure that consultations are culturally appropriate, do not exclude any stakeholder groups, raise false expectations or result in commitments without having obtained prior agreement. Roles of third parties will therefore be clarified upfront through terms of reference and regularly monitored once activities are underway.

*Hire, train, and deploy the right personnel:* During the initial stakeholder engagement, TAP will confirm which stakeholder groups will need to be engaged with during different phases of the project cycle. Engaging different types of stakeholders requires different skills and staffing considerations. When hiring community liaison staff, TAP will consider people who will be able to develop and maintain good working relationships with the local communities. Since their job will involve listening and responding to local concerns and suggestions, TAP will hire community liaison officers that have:

- good people and communication skills;
- a good understanding of the local language and community/cultural dynamics;
- open-mindedness and respect for the views of others;
- a solution-oriented approach;
- a high integrity/degree of trustworthiness;
- a genuine commitment to the position and its goals; and
- understanding and respect for TAP’s objectives and governing documents including embracing TAP’s team culture.

6 Grievance Mechanism

6.1 Introduction

TAP has established a grievance mechanism to be aware of and respond to stakeholders’ concerns and to facilitate resolution of stakeholders’ grievances. The grievance mechanism will address concerns promptly and effectively, using an understandable and transparent process that is culturally appropriate and readily accessible to all segments of the affected parties, at no cost and without retribution.
The mechanism includes an independent, objective appeal mechanism, which will not impede access to judicial or administrative remedies. Through the SEP and other means, TAP will inform the affected parties about the grievance process and report regularly to the public on its implementation, protecting the privacy of individuals.

The grievance mechanism is part of TAP’s broader process of stakeholder engagement and quality and compliance assurance. While TAP is committed to avoid grievances through its dedication to a good overall stakeholder engagement process, it is aware that grievance and complaints will occur and need to be addressed in good faith and through a transparent and impartial process.

TAP has establish a Third Party Grievance Mechanism for Pre-Construction Phase based on the preliminary consultations and as part of the SEPs in order to have the mechanism up and running before the beginning of the social and environmental assessment process.

6.2 Grievance Mechanism Principles

The grievance mechanism will follow the principles set out in the following sections:

6.2.1 Communication

TAP believes that the best way of grievance redress, is to communicate with all stakeholders on a regular basis. Therefore, TAP will hire people with the right skills, training, and disposition for community liaison work and get them into the field when appropriate. Maintaining a regular presence in the local communities greatly helps to personalize the relationship with the company, engenders trust and creates an informal atmosphere in which grievances can be aired and sorted out, or referred up the chain of command. This is usually more convenient and less intimidating to people than having to travel distances to an office during business hours to file a formal complaint.

A process for addressing complaints cannot be effective if nobody knows about it; therefore TAP will outline its grievance mechanism in writing, publicize it and explain it to all affected parties. As with all information, this disclosure will be provided in a format and language readily understandable to the local population and/or communicated orally in areas where literacy levels are low and will be simple enough so that it does not require legal counsel to complete.
6.2.2 Transparency

The process needs to be transparent, fair, readily understandable, accessible and culturally appropriate for all affected parties in particular vulnerable populations as their concerns are often not heard. TAP will clarify at the outset who is expected to use this procedure, and assure potential users that there will be neither costs nor retribution associated with lodging a grievance and that their personal data will be treated according to the local legislation on privacy. The entire process – from how a complaint is received and reviewed, through to how decisions are made and what possibilities may exist for appeal – will be made as transparent as possible through good communication.

6.2.3 Timing

Based on the negotiation on the SEP, TAP will publicly communicate and commit to a certain timeframe in which all recorded complaints will be responded to and ensure that this response time is enforced. This helps allay frustration by letting people know when they can expect to be contacted by TAP personnel and/or receive a response to their complaint. Combining this with a transparent process by which stakeholders can understand how decisions are reached inspires confidence in the system. During critical time periods, such as construction, it is important to have an immediate response to time-sensitive complaints, such as a fence being knocked down by a contractor, for example, and livestock getting out. A related issue is making sure that TAP personnel receiving grievances (typically community relations staff) have the authority to resolve basic complaints themselves, as well as direct reporting lines to senior managers if the issue is more serious or costly to address.

6.2.4 Fairness

In case that a SEP documents that affected parties require certain additional measures to level the playing field of perceived power, TAP will put such measures in place. This could be a NGO, which assists affected parties to advocate on their behalf, or an honest broker to mediate between TAP and its stakeholders.

6.2.5 Written Records

Through its Grievance Log TAP will keep a written record of all complaints as is critical for effective grievance management. The record will contain the name of the individual or organization; the date and nature of the complaint; any follow-up actions taken; the final result; and how and when this decision was communicated to the complainant. In addition to informing the complainant of the outcome, TAP will also report back periodically to communities and other
stakeholder groups as to how the company has been responding to the grievances it has received.

### 6.2.6 Worker Grievances

Grievance mechanisms for workers will be separate from public grievance mechanisms and TAP will assure that this is done in accordance with the Performance Requirement 2 of the EBRD.

### 6.3 Grievance Process for Pre-Construction Phase

The document “TAP Third Party Grievance Mechanism for Pre-Construction Phase” (TAP-EXT-MA-0001) defines the project grievance. The procedure involves the following six stages:

- Identification;
- registration and categorisation;
- acknowledgement;
- investigation/response;
- communication of the response and request for stakeholders’ feedback; and
- close-out.

The TAP Third Party Grievance Mechanism for Pre-Construction Phase provides further information on the following issues:

- Grievance eligibility: a grievance can be submitted by an individual, a group of individuals and/or organization(s), who claim that the activities associated with the TAP project or its staff or contractor has caused harm to the complainant’s health, property, livelihood or natural environment. In addition, this overall strategy is applicable to such groups as national and international NGOs. Grievances are received by TAP’s central and local offices.

- Responding to grievances: the Stakeholder Manager takes a decision on acceptance or rejection of the grievance. This decision is communicated to the complainant, including motivations for the choice made. In case the grievance is accepted, the actions that TAP will take are decided and communicated to the complainant within a maximum of 21 days.

- Corrective actions: the Stakeholder Manager coordinates the definition of the corrective actions involving where appropriate other team members, contractors or the Project Management Team.

- Appeals procedure: in case the complainant is unsatisfied with the outcome of the grievance, TAP will propose to involve a panel of experts to assist in the evaluation of the events.
• Documentation: detailed information about the grievance process is recorded in the grievance form archived also in the Grievance Log.

7 Monitoring and reporting

7.1 Introduction

TAP will involve affected parties in monitoring the SEPs, the mitigation measures agreed on in the ESIA and social and environmental investment programmes because this helps satisfy stakeholder concerns and promotes transparency.

As the ESIA progresses, this SEP will be developed to provide an outline of how affected parties can be involved in the monitoring and evaluation and to assess whether capacity-building and training programmes are needed to enable affected parties or local organisations to acquire the technical skills necessary to participate in effective monitoring.

If necessary, TAP will put a participatory monitoring system in place that uses methods and indicators meaningful to the stakeholders concerned. If this is not desired or is deemed unfeasible, TAP will involve affected parties in monitoring by collecting their observations to triangulate scientific findings and by engaging them in discussions on the findings of external monitoring and evaluation missions.

If necessary, TAP might establish an independent monitoring panel or group to oversee and report on environmental and social performance. This body might include TAP’s stakeholder representatives, internationally recognised technical experts and/or eminent individuals.

7.2 Monitoring Stakeholder Engagement Activities

During all consultation activities, questions will be posed to stakeholders to provide an indication of the effectiveness of the meeting and the process of stakeholder engagement. These will be tailored to be relevant to the audience but will address the manner in which the meeting and overall process is viewed to be free of manipulation, interference, coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information in a culturally appropriate format.

A guideline for the preparation of the questionnaire is provided in Table 7.1. The example questions in the table aim to yield a YES/NO answer. The Evaluation Criteria column provides
the criteria proposed to assess the level of effectiveness of the engagement (H-High, M- Medium, L-Low).

### Table 7.1 Evaluation of Meetings

<table>
<thead>
<tr>
<th>Example questions to be asked to stakeholders</th>
<th>Rate of Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Free of manipulation, interference, coercion, and intimidation</td>
<td>- Have you been in any way intimidated or coerced during this consultation process?</td>
</tr>
<tr>
<td></td>
<td>- Have you been in any way intimidated or unduly incentivised to be supportive of the project?</td>
</tr>
<tr>
<td>Timely and relevant information</td>
<td>- Do you think you have been provided with all relevant information in advance of this meeting?</td>
</tr>
<tr>
<td></td>
<td>- Do you feel the developer allowed enough time for interpretation of project information and the submission of comments?</td>
</tr>
<tr>
<td></td>
<td>- Do you think you had enough opportunities to have a meaningful influence on the broad project design options (e.g., mitigation measures, sharing of development benefits and opportunities, siting, location, routing, sequencing, and scheduling)?</td>
</tr>
<tr>
<td>Appropriate, understandable and accessible information</td>
<td>- Did you find the information discussed during this meeting useful?</td>
</tr>
<tr>
<td></td>
<td>- Do you find the material distributed/shown adequate and complete, including draft documents and plans regarding the project?</td>
</tr>
<tr>
<td></td>
<td>- Do you think it is clear how TAP will include your comments on issues such as proposed mitigation measures, the sharing of development benefits, opportunities, and implementation issues in the final project documents?</td>
</tr>
<tr>
<td></td>
<td>- Do you think you have been consulted in a culturally appropriate way?</td>
</tr>
<tr>
<td></td>
<td>- After the meetings, do you feel that you fully understand how the project will affect your life?</td>
</tr>
</tbody>
</table>

The results will be collected and monitored during the overall process of engagement. On a regular basis (and at least at the end of each round of engagement), the Stakeholder Manager will review the key indicators scoring to evaluate the effectiveness of the meetings.

This process will enable TAP to identify trends over time and the main areas of concern in terms of engagement. A medium or low score after a particular meeting or over an engagement phase will indicate an inadequacy with the engagement activities that requires corrective action. Measures on how to address these issues may include a review of the information disclosed to stakeholders, a revision of the timescale or location where meetings were held, etc. If necessary,
additional meetings may be organised with particular stakeholder(s) to clarify and understand the main areas of concern in terms of the above criteria.

7.3 Reporting Stakeholder Engagement Activities

All stakeholder engagement activities will be recorded in the Stakeholder and Consultation Database that will be maintained by TAP throughout the project. The purpose of the database is to ensure that communication with stakeholders is accurately logged such that views expressed are taken into consideration by the project and that any commitments made are delivered upon.

The results of stakeholder engagement activities, including how stakeholder comments have been taken account, will be reported in all ESIA reports and documented in the relevant annexes to be attached to the SEP in the full ESIA report.
APPENDIX

- **Appendix A**: Grievance Reporting Form

- **Appendix B**: Minutes of Meeting Format
### APPENDIX A: GRIEVANCE REPORTING FORM

#### THIRD PARTY GRIEVANCE FORM

<table>
<thead>
<tr>
<th>RECORD DETAILS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Grievance number:</td>
<td></td>
</tr>
<tr>
<td>Date received:</td>
<td></td>
</tr>
<tr>
<td>Reporting method (verbal/written):</td>
<td></td>
</tr>
<tr>
<td>Name of person receiving grievance:</td>
<td></td>
</tr>
<tr>
<td>Target date for resolution:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>COMPLAINANT DETAILS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Complainant’s name:</td>
<td></td>
</tr>
<tr>
<td>Land parcel number (if applicable):</td>
<td></td>
</tr>
<tr>
<td>Complainant’s postal address:</td>
<td></td>
</tr>
<tr>
<td>Complainant’s telephone number and e-mail address (if available):</td>
<td></td>
</tr>
<tr>
<td>Complainant confidentiality:</td>
<td>Yes No</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>GRIEVANCE DETAILS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of incident:</td>
<td></td>
</tr>
<tr>
<td>Incident details (what? when? how? where? quantities?):</td>
<td></td>
</tr>
<tr>
<td>Complainant’s request to resolve grievance:</td>
<td></td>
</tr>
</tbody>
</table>

- **Grievance type (environment, human rights, livelihood, health, legal, property, corruption, etc.):**
- **Level of damage:** low | medium | high

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1 Form extracted from “Third Party Grievance Mechanism for Pre-Construction Phase” (TAP-EXT-MA-0001)
Additional documentation attached to grievance:

**RESOLUTION DETAILS**

Acknowledgement letter:

Assessment of grievance (by whom, when, findings):

Acceptance/rejection decision: Accepted | Partially Accepted | Rejected

Acceptance or rejection letter:

Grievance resolution summary (compensation/other corrective actions, responsible person/team, timeframe):

**GRIEVANCE CLOSURE**

Close-out letter:

Complainant’s feedback on the resolution:

Grievance closure date:

Supporting documentation:

Appeals history (if applicable):

Grievance status: Open | Closed

Additional comments:
APPENDIX B: MINUTES OF MEETING FORMAT

MINUTES OF MEETINGS  

Consultation Date

Consultation Type
  □ face to face  □ focus group  □ public meeting
  □ press conference  □ ………………

Location Address

Location Town/ Village

Location Country

Stakeholder Contact Person

Stakeholders Individuals and Groups

TAP Representatives

Other Attendees

Confidential
  □ yes  □ no

Discussion Areas

Issue

Grievance

Annexes

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Form structured according to the Stakeholder Consultation Database – Consultation Log – Release July 2010