

Chapter 6: Stakeholder Engagement

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6 Stakeholder Engagement

6.1 Introduction

This chapter describes the South Stream Transport approach to stakeholder engagement, its purpose and the regulatory context in which it occurs. It provides information about engagement activities undertaken to date and those that are planned for the future. This chapter also summarises the comments that have been made by stakeholders to date and how these comments are addressed within the relevant chapters of this Environmental and Social Impact Assessment (ESIA) Report.

In this chapter, the national Environmental Impact Assessment (EIA) stakeholder engagement process will also be referred to as this sets important context at the Turkish national level and in doing this, shows how South Stream Transport has not only complied with national legislation, but also with Good International Industry Practice (GIIP). Although the national EIA and the ESIA process have been run separately in parallel, engagement activities for both processes are described in this chapter, as South Stream Transport will consider comments from stakeholders from both processes while completing the ESIA process.

This chapter is structured as follows:

- *Section 6.2* describes the national and international framework upon which the stakeholder engagement programme has been developed;
- *Section 6.3* describes the foundation of the stakeholder engagement programme, as well as the supporting documents and processes;
- *Section 6.4* outlines the stakeholder engagement activities for each phase of the Project lifecycle; and
- *Section 6.5* summarises comments, questions and recommendations received to date.

Stakeholder engagement (including dialogue, consultation and the disclosure of information) is a key element of project planning, development and implementation. Effective stakeholder engagement assists good design, builds relationships with local communities, and reduces the potential for delays through the early identification of risks and issues. South Stream Transport is committed to a transparent and respectful dialogue with stakeholders throughout the life of the Project.

The engagement approach for the Project includes a range of activities designed to consult stakeholders, using methods which take into account the varied interests that stakeholders may have in the Project as well as their location, language, culture, their access to information and the different opportunities to participate (e.g. through statutory consultation processes as well as through the ESIA process). The Project's approach to stakeholder engagement includes making best efforts to ensure stakeholders are provided with adequate, timely and culturally appropriate information about the Project, the ESIA and consultation process. It also provides opportunities for stakeholders to ask questions, make comments and suggestions and raise any concerns that they may have. The Project's approach to stakeholder engagement has been developed to align with the national legislative requirements and international standards

applicable to the Project, which are summarised in **Chapter 2 Policy, Regulatory and Administrative Framework** and described in Section 6.2.

Stakeholder engagement is an important element of the ESIA process in that it enables the ESIA Report to be informed by the interests and concerns of stakeholders, and provides opportunities for stakeholders to have those interests and concerns considered in decisions that may affect them. Effective engagement also helps to establish a relationship between stakeholders and South Stream Transport, which is based on trust and respect.

South Stream Transport has taken these principles into account in the planning and implementation of stakeholder engagement activities for the Project (Section 6.3).

TERMS TO KNOW

Consultation: The process of sharing information, ideas and concerns in a two-way dialogue between project proponents and stakeholders, allowing stakeholders to express their views and for these to be considered in the decisions about project planning and implementation.

Disclosure: The process of making information available to stakeholders. Includes the publication of reports or documentation (in digital and/or paper formats), and announcements related to the disclosure process.

Grievance: Formal complaint by individuals, groups or organisations who feel they have been adversely affected by Project-related activities.

Grievance Procedure: Process of recording and addressing grievances so that they can be tracked through to a resolution.

Mitigation: Measures developed through the ESIA process to prevent, avoid and reduce adverse impacts. Can also include measures to enhance beneficial impacts.

Stakeholder: Any individual, group or organisation potentially affected by a project, interested in, or with influence over, a project.

Stakeholder Engagement Plan: A Stakeholder Engagement Plan (SEP) forms part of the ESIA documentation and provides a plan and implementation strategy to guide stakeholder engagement throughout the project lifecycle.

6.2 Regulatory Context

This section describes the regulatory framework that applies to the Project. The Project's approach to stakeholder engagement considers both regulatory requirements and principles of GIIP, and seeks to:

- Meet the regulatory requirements of Turkey for public consultation and disclosure during the EIA process (described in Section 6.2.1);
- Align with international standards and guidelines for financing (and GIIP), as related to Environmental and Social Impact Assessment, that provide a framework for public consultation and disclosure during the ESIA process (described in Section 6.2.2); and

- Align with international conventions and protocols relevant to stakeholder engagement for the Project (described in Section 6.2.3).

The national EIA and international ESIA processes are illustrated in Figure 6.1. Consultation and disclosure requirements for the Turkish EIA process have several features in common with stakeholder engagement processes for international ESIA's. Both are based on the principle that those who may be affected by a project should be consulted.

South Stream Transport seeks to align the two processes, avoid duplication and ensure that where possible and permissible, the processes inform each other. The regulatory framework is summarised in **Chapter 2 Policy, Regulatory and Administrative Framework** and the aspects of it that relate to stakeholder consultation are described in further detail in this section (Section 6.2).

6.2.1 National Requirements

Consultation and disclosure requirements for the Turkish EIA process are outlined in the Turkish EIA Regulation (Ref. 6.1), which entered into force on 7 February 1993 and was revised on 23 June 1997 and 6 June 2002. The latest revision to comply with the European Union (EU) Directives entered into force on 7 February 1993 and was revised on 23 June 1997 and 6 June 2002 85/337/EEC and 97/11/EC (Ref. 6.2 and Ref. 6.3). It was published on 17 July 2008.

In common with the international ESIA process, public engagement is a requirement of the EIA process, to enable stakeholders who may have an interest in, or who are affected by the Project, to participate in the process and comment on the Project. All stakeholder feedback from EIA public engagement activities and relevant feedback gathered from statutory authorities during the EIA process is incorporated into this ESIA Report.

Public consultation is a mandatory part of the EIA process, led by the Ministry of Environment and Urbanisation (MoEU), involving four elements:

- *Application* – this includes the submission of the EIA Application File (EIAAF), review by the MoEU and establishment of the Review and Evaluation Committee (REC);
- *Scoping* – following the review period, the EIAAF is disclosed to the public and the MoEU holds a Public Participation meeting/s where information about the proposed Project and the EIA process, including a preliminary assessment of potential environmental and social impacts, is presented to the public, who are invited to ask questions and provide comments. A Scope and Special Format Determination (SSFD) meeting is held, attended by the REC, and the contents of the EIA Report are discussed including stakeholder feedback from the Public Participation meeting. The Special Format (i.e. the EIA Report table of contents) is determined;
- *Draft EIA* – submission of the draft EIA Report to the MoEU for review, followed by the commencement of the Review and Evaluation process. The draft EIA Report is disclosed to the public (through announcements on the MoEU website) and stakeholders have the opportunity to provide comments within a timeframe announced by the MoEU and comments received from stakeholders are considered by the MoEU and REC. A Review and

Evaluation meeting is held with the MoEU and REC to provide feedback for consideration in the final EIA Report; and

- *Final EIA* – comments received during the Draft EIA Stage are reflected in the EIA Report as necessary. The final EIA Report is then submitted to the MoEU, who publish the report online for a period of ten business days, after which an 'EIA Positive' or 'EIA Negative' decision is made by the MoEU.

6.2.2 Standards and Guidelines for Financing

In addition to the EIA requirements described above, the Project is being developed in accordance with international standards and guidelines for financing and GIIP. In relation to ESIA and more specifically, stakeholder engagement, the applicable standards are:

- The Organisation for Economic Cooperation and Development (OECD) Common Approaches to Environmental and Social Due Diligence (Ref. 6.4);
- The Equator Principles III (Ref. 6.5; Ref 6.6);
- Japan Bank for International Cooperation (JBIC) Environmental and Social Considerations Required for Funded Projects (Ref. 6.7); and
- The International Finance Corporation (IFC) Performance Standards (PS) (Ref. 6.8).

All the standards and guidelines listed above require compliance with applicable national legislation, including laws implementing national obligations under international law.

Details of these international standards and guidelines as they apply to stakeholder engagement are provided below in Sections □to 6.2.2.4.

6.2.2.1 OECD Common Approaches

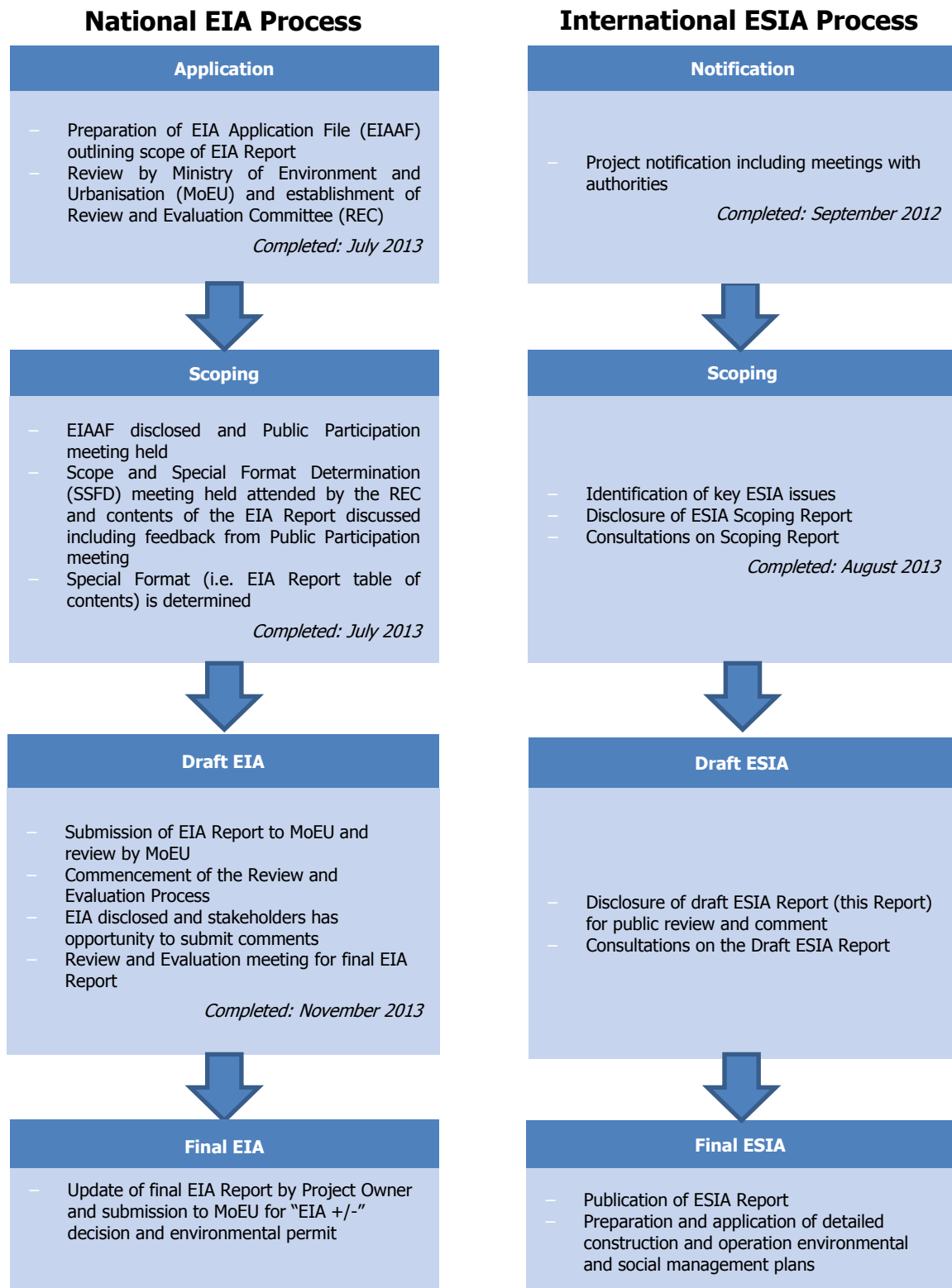
As detailed in **Chapter 2 Policy, Regulatory and Administrative Framework**, the Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (the 'Common Approaches') of the OECD (Ref. 6.4) provide guidance for considering environmental and social risks in decisions to offer official support for export credits.

In relation to stakeholder engagement, the "Common Approaches" recommend that:

- ESIA Reports and related information should be made available to affected communities in a language accessible to them for at least 30 days; and
- OECD member countries should encourage protection and respect for human rights and foster transparency, predictability and responsibility in decision-making by encouraging disclosure of ESIA information.

Turkey is a member country of the OECD and ratified the Convention on the Organisation for Economic Co-operation and Development on 2 August 1961 (Ref. 6.9). Of the South Stream Offshore Pipeline host countries (i.e. Turkey, Bulgaria and Russia); only Turkey is a member of the OECD.

Figure 6.1 National EIA and International ESIA Processes



6.2.2.2 Equator Principles

The Equator Principles (EPs) include guidance for stakeholder engagement in Principle 5: Stakeholder Engagement. For certain projects¹, the EPs require that structured and culturally appropriate consultation is undertaken with stakeholders (including affected communities; Ref. 6.5 and Ref. 6.6). It should also facilitate their informed participation and be able to demonstrate how the concerns of affected communities have been considered in project decision-making.

6.2.2.3 Japan Bank for International Cooperation

The focus of the Japan Bank for International Cooperation (JBIC) (Ref. 6.7) Environmental and Social Considerations Required for Funded Projects (**Chapter 2 Policy, Regulatory and Administrative Framework**) is generally aligned with that of the IFC Performance Standards. The purpose, according to the guideline, is to demonstrate that project proponents are undertaking appropriate environmental and social considerations, through various measures, so as to prevent or minimise the impact on the environment and local communities which may be caused by the projects for which JBIC provides funding, and not to bring about unacceptable effects.

Specific to Stakeholder Engagement, and in line with IFC PSs described in Section 6.2.2.4, JBIC requires that projects must be adequately coordinated so that they are accepted in a manner that is socially appropriate to the country and locality in which the project is planned. For projects with a potentially large environmental impact, sufficient consultations with stakeholders, such as local residents, must be conducted via disclosure of information from an early stage where alternative proposals for the project plans may be examined. The outcome of such consultations must be incorporated into the contents of the project plan; and appropriate consideration must be given to vulnerable social groups, such as women, children, the elderly, the poor, and ethnic minorities, all of whom are susceptible to environmental and social impact and who may have little access to the decision-making process within society.

6.2.2.4 IFC Performance Standards

The IFC Performance Standards (PS) apply to private sector projects seeking financing from international financial institutions (Ref. 6.8), and also underpin many other financing guidelines (including the Equator Principles and the OECD Common Approaches). IFC PS1—Assessment and Management of Environmental and Social Risks and Impacts—sets out guidance for stakeholder engagement as part of project development.

IFC PS1 states that project sponsors should promote and provide means for adequate engagement with communities affected by a project, on issues that could potentially affect

¹ Category A and, as appropriate, Category B projects located in non-OECD countries, and those located in OECD countries not designated as High-Income, as defined by the World Bank Development Indicators Database. Category A projects are defined as those that have potential significant adverse environmental or social risks and/or impacts that are diverse, irreversible or unprecedented. Category B projects are defined as having limited adverse risks. The Project is considered a Category A project.

them. It also states that relevant information about environmental and social issues should be disclosed and disseminated and that communications (including questions, comments, suggestions and grievances) from affected individuals, groups, communities and other stakeholders should be responded to and appropriately managed.

IFC PS1 also calls for the development and implementation of an Environmental and Social Assessment and Management System (ESMS) and a Stakeholder Engagement Plan (SEP). It focuses on the need to tailor engagement according to the expected scale and type of impacts and to make it appropriate to communities that may be affected by a project, as well as other stakeholders. This includes allowing disadvantaged and vulnerable groups to participate effectively.

In relation to information disclosure, IFC PS1 requires project proponents to provide affected communities with access to relevant and understandable information about the project and the ESIA process and to provide them with opportunities to express their views on project risks, impacts and mitigation measures, and for the project proponent to consider and respond to these.

The requirement for a Grievance Procedure is also detailed in IFC PS1. A Grievance Procedure should be designed to receive and facilitate resolution of community grievances arising from project activities. IFC PS1 also calls for periodic reports to be made to affected communities about issues of concern, including those identified through the consultation process or Grievance Procedure.

6.2.3 International Conventions

6.2.3.1 Aarhus Convention

The Convention on Access to Information, to Public Participation in the Decision Making Process and the Administration of Justice concerning Environmental Matters (the Aarhus Convention, adopted in 1998, Ref. 6.10) also includes provisions that relate to stakeholder engagement. It establishes public rights of access to environmental information and aims to promote public participation in decision making about environmental matters. Of the three host countries of the South Stream Offshore Pipeline, Bulgaria is the only one that has ratified the Aarhus Convention.

6.2.3.2 Espoo Convention

The United Nations Convention on EIA in a Transboundary Context (Espoo Convention, 1991; Ref. 6.11), sets out the obligations of signatory countries to assess the environmental impact of certain activities at an early stage of planning and lays down their general obligation to notify and consult each other on all major projects under consideration that are likely to have a significant adverse environmental impact across boundaries.

The Convention entered into force on 10 September 1997. Of the three host countries for the Project, only Bulgaria has ratified the Convention. Consultation related to Espoo is described in the ESIA Report for the South Stream Offshore Pipeline – Bulgarian Sector.

6.3 Approach to Stakeholder Engagement

South Stream Transport's approach to stakeholder engagement is designed to comply with Turkish legislation and to be aligned with international standards and guidelines as described in Section 6.2. Accordingly, it provides a mechanism for stakeholders to be engaged during all phases of the Project. Within each phase of the Project, a range of engagement activities will be undertaken to address the needs of different stakeholders and stakeholder groups.

The main elements of the approach to stakeholder engagement are described in this section. Section 6.3.1 describes the Stakeholder Engagement Plan (SEP), which provides a framework for past, current and future engagement activities. The SEP is the mechanism by which the principles and processes for stakeholder engagement, outlined in this chapter, are implemented. Section 6.3.2 describes the process by which various stakeholders have been (and continue to be) identified. Section 6.3.3 discusses the ways in which stakeholders can provide feedback to South Stream Transport about the Project, and Section 6.3.4 presents the Stakeholder and Consultation Database (SCD), which is South Stream Transport's central mechanism for managing and coordinating feedback received throughout the stakeholder engagement process. Finally, Section 6.3.5 introduces the Grievance Procedure for the Project.

6.3.1 Stakeholder Engagement Plan

South Stream Transport's SEP for Turkey provides a stakeholder engagement framework for all phases of the Project, including the Construction and Pre-commissioning, Operational and Decommissioning Phases. The SEP is a 'living' document and is progressively updated as the Project moves through the various phases of planning and implementation. Further updates will be issued around key Project milestones, such as the disclosure of the ESIA Report, and the start of construction activities.

The SEP describes the way in which South Stream Transport:

- Identifies stakeholders;
- Develops and maintains positive relationships with stakeholders;
- Provides culturally appropriate, adequate and timely information about the Project and the EIA/ESIA process to stakeholders;
- Provides suitable opportunities for stakeholders to express their opinions and concerns in relation to the EIA/ESIA and Project development;
- Enables compliance with Turkish regulations and alignment with international standards and guidelines for financing;
- Ensures that Project decisions consider stakeholder priorities, views and concerns and that these are reflected in the EIA/ESIA and Project management decisions where appropriate; and
- Will engage with stakeholders to establish and maintain dialogue.

The SEP is published in English and Turkish on the South Stream Transport website. The next update to the SEP will include more detailed information on the planned ESIA disclosure and

consultation activities. The latest version of the SEP is always available on the South Stream Transport website at www.south-stream-offshore.com.

6.3.2 Stakeholder Identification

It is important to identify the Project's stakeholders and understand how they may be affected, or perceive that they may be affected, so that engagement can be tailored to inform them and appropriately address their views and concerns.

Stakeholders with an interest in the Project have been identified in several ways. These include:

- Drawing on the local knowledge of in-country environmental and social consultants;
- Feedback from consultations with stakeholders held to date;
- Desktop research including reviews of previous ESIA's for relevant (by type or location) previous projects; and
- Scoping of anticipated impacts and receptors.

In addition, stakeholder engagement activities also help to identify and engage additional stakeholders and stakeholder groups.

When planning engagement activities, it can be helpful to group stakeholders based on common interests and characteristics. As such, South Stream Transport uses a number of "stakeholder categories" to help structure engagement activities for stakeholders of the Project. Stakeholder categories in the Turkish Sector include:

- Fisheries and other marine area users;
- Residents of Black Sea coastal communities;
- Government authorities (national, regional and local);
- Inter-governmental organisations;
- Non-governmental organisations (NGOs);
- Businesses and business associations;
- Academic and scientific organisations; and
- Media.

These stakeholder categories are described in Table 6.1 including a summary of the anticipated interest of these groups with respect to the Project (e.g. potential impacts, benefits, concerns) and how they have been engaged to date. Further detail on stakeholder engagement activities and stakeholder issues and concerns is provided in Section 6.4 and Section 6.5, while Appendix B of the SEP provides a full list of all identified stakeholders in Turkey.

Table 6.1 Stakeholder Categories and Identification

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
<i>Fisheries and Other Marine Area Users</i>		
Fishers and fisheries organisations may be interested in potential Project impacts on fishing activities and livelihoods, including access to fishing areas and changes in fish health, migration, and catch volumes. They could also be concerned about unplanned events (e.g. fuel spills) and how these events could affect fish health.	<p>Fisheries cooperatives in Trabzon, Samsun and Sinop.</p> <p>The Central Union of Fisheries Cooperative (in Ankara).</p>	<p>South Stream Transport engaged with the Central Union of Fisheries Cooperatives in Ankara, as well as fisheries cooperatives in the East Black Sea fishing region (as this is the most productive region in terms of catch volumes – Chapter 9 Socio-Economics) during the Scoping Stage. These groups were also interviewed regarding their fishing activities and interests as part of baseline fisheries study. Further meetings were also held with the fisheries cooperatives in Trabzon and Samsun in May 2014 to provide them with Project updates and to discuss aspects of ESIA disclosure planning.</p> <p>Consultation to date has established that their main issue of concern relates to potential impacts on commercial species that migrate through the Project Area, particularly anchovy. As most fishing activity is concentrated in Turkey's coastal waters (whilst the Project is more than 110 km from shore), fisheries organisations have not expressed any concerns relating to access to fishing grounds.</p>
Shipping and offshore oil-and-gas exploration companies also have an interest in accessing and using the marine area, although potential impacts on these companies were considered but have been ruled out (as described in Chapter 9 Socio-Economics).	Turkish Petroleum Corporation (TPAO).	<p>Due to the fact that there are no anticipated impacts on shipping, no targeted engagement has been undertaken with this group.</p> <p>Coordination and engagement with TPAO has been ongoing as the Project crosses a licence block held by TPAO. TPAO is also a competent authority in the EIA review process.</p>

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Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
<i>Residents of Black Sea Coastal Communities</i>		
Although Project activities will be short term and will occur more than 110 km from the coast, it is possible that residents of the Black Sea coastal communities may be concerned about potential impacts on Turkey's coastline or coastal waters and, in turn, on community values such as beach use, tourism and the health of the marine ecosystem.	Residents of Trabzon, Samsun and Sinop.	<p>The publication of the Scoping Report was announced in Samsun, Sinop and Trabzon inviting stakeholders to comment on the Report. A comment box was also set up in Sinop to allow stakeholders to review printed copies of the Report and submit comments. Only five comments were received during this period, all of which were submitted through the Sinop comment box. Questions related to the potential impact of an unplanned event on the marine environment and coastline.</p> <p>The MoEU chose Sinop as the location for a public meeting as part of the EIA process. Attendance was low, and the limited public interest in the Project to date may be attributed to the distance of the Project from Turkey's coastline.</p>
<i>Government Authorities</i>		
<p>Turkish authorities have an interest in the national EIA and permitting procedures, particularly in terms of ensuring compliance with Turkish regulations.</p> <p>In addition to their regulatory role, government departments have specific interests which may be affected by the Project (e.g. environment, marine navigation).</p>	<p>Turkish national government including the MoEU, Ministry of Foreign Affairs (MoFA), and the naval and armed forces.</p> <p>Provincial government office in Sinop and associated directorates.</p>	National and regional government authorities have been informed and consulted as part of the ESIA process, although formal engagement with the authorities is covered by the national EIA process. Engagement with various governmental departments responsible for topics such as environment, culture, tourism, transportation, safety, fisheries, archaeology and natural resources has been ongoing throughout the EIA, ESIA and permitting processes.

Continued...

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
<i>Inter-Governmental Organisations</i>		
<p>Inter-governmental organisations (i.e. those whose scope covers the interests of more than one nation) related to the protection of the Black Sea may be interested in the potential impacts of the Project on the marine environment.</p>	<p>The Permanent Secretariat of the Commission on the Protection of the Black Sea Against Pollution (also known as the Black Sea Commission).</p>	<p>The Convention on the Black Sea Against Pollution (Bucharest Convention) has been ratified by all the Black Sea countries and the Black Sea Commission was established to address issues of marine pollution and the protection of the marine environment.</p> <p>A meeting was held with the Permanent Secretariat of the Black Sea Commission in November 2012 to introduce the Project. Since this introduction, South Stream Transport has provided further information and updates to the Permanent Secretariat. The Permanent Secretariat has indicated that it will distribute Project information to the other members of the Black Sea Commission.</p>
<i>Non-Governmental Organisations (NGOs)</i>		
<p>NGO's interests in the Project may range from protection of the Black Sea ecology, to archaeological assets, to potential impacts on tourism and other industries. NGOs are often interested in reviewing and commenting on EIA and ESIA documents, particularly in regard to the identification of environmental and social impacts and the ways that these impacts will be mitigated and managed.</p>	<p>A number of international, national and regional NGOs (based in Istanbul, Ankara, Trabzon and Samsun), including NGOs with environmental and cultural heritage interests.</p>	<p>NGOs were engaged during the Scoping Stage with invitations to review and comment on the Scoping Report, and to participate in meetings. NGOs identified to date have included those with a particular interest in the marine ecology and environmental protection of the Black Sea, as well as the protection of cultural heritage assets.</p> <p>Of the NGOs engaged to date, only the Turkish Marine Protection Association (TURMEPA) and the Nature Conservation Society have provided feedback regarding the Project.</p>

Continued...

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
<i>Business and Business Associations</i>		
Local businesses may be interested in potential business generation and procurement opportunities related to the Project. However, no onshore facilities are envisaged in Turkey, nor will Turkish ports be used, thus limiting the potential scope for interest in the Project among business and business associations.	Chambers of Commerce and Industry in Trabzon and Sinop.	The Chambers of Commerce and Industry were engaged during the Scoping Stage to establish any potential for perceived impacts or interest in the Project among this stakeholder group. However, there was no indication as to potential beneficial or adverse Project impacts.
<i>Academic and Scientific Organisations</i>		
Academic and research organisations may be interested in data from the Project's numerous marine surveys, as well as the potential effects on the marine environment or ecology and mitigation measures.	A number of marine research institutes and university departments with a particular interest in the Black Sea based in Istanbul, Ankara, Sinop and Trabzon.	Marine research institutes and university departments with a particular interest in issues pertaining to the Black Sea were engaged during the Scoping Stage. Engagement has indicated that these stakeholders are primarily interested in the potential effects of unplanned events on the marine environment.
<i>Media</i>		
Journalists and other representatives of the media are often interested in ensuring that clear and transparent information about the Project is communicated to the national population. Interested in general Project information including updates on the EIA and ESIA process.	Turkish media at national, regional and local levels.	Engagement with the media has occurred through press releases and announcements during key disclosure events, such as the publication of EIA and ESIA documentation.

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6.3.2.1 Coastal Communities

As detailed in Section 6.2.2, international standards and guidelines state that appropriate consultation should be undertaken with 'affected communities'. In the Turkish Sector, there are no onshore activities and all construction and operational activities will occur more than 110 km from the Turkish coastline. Therefore, no affected communities as defined by IFC PS1 have been identified.

However, South Stream Transport identified (in collaboration with the MoEU) three communities along the Eastern Turkish Black Sea coast where stakeholders may have an interest in the Project:

- Trabzon is an important fishing town, accounting for 20% of the total fish production in the Black Sea (Ref. 6.12);
- Samsun is also identified as an important fishing town; and
- Sinop is the closest land point to the Project, and as such was selected by the MoEU as the location for EIA stakeholder engagement. It is also considered as the epicentre for coastal fishing in the Turkish Black Sea region.

By consulting with these communities, the Project seeks to engage with marine area users who are most likely to be interested in, or affected by, the offshore works associated with the Project.

As discussed in **Chapter 9 Socio-Economics**, the Western Black Sea fishing region is much less productive than the East Black Sea fishing region. Therefore, this is not an area of focus for stakeholder engagement activities.

6.3.2.2 Vulnerable Groups

Stakeholder identification and engagement also seeks to identify any potentially vulnerable or disadvantaged individuals and groups in local communities. Vulnerable groups are those who may be differently or disproportionately affected by the Project, or whose situation may mean that special care is needed to engage them in consultation and disclosure activities (e.g. in terms of language, literacy, technology, etc.).

Using guidance provided in IFC PS1, small-scale and artisanal fishers are the only potentially vulnerable group that has been identified with respect to the Turkish Sector. This group could potentially be differently affected by Project impacts because they are likely to have fewer financial resources, including savings and/or access to credit, which in turn could make them vulnerable to economic fluctuations if their fishing activities or harvests were to be adversely affected by the Project (including by potential unplanned events such as a fuel spill).

Potential Project impacts on small-scale and artisanal fishers have been considered in **Chapter 9 Socio-Economics**. However, it is important to note that the socio-economic impacts of the Project are limited due to the fact that the Project is located more than 110 km from the coast. There is no expected impact on small-scale and artisanal fisheries.

South Stream Transport has also considered the needs of all potentially interested stakeholders, including those for whom special care in consultation may be needed, through the stakeholder engagement process. Efforts have been made to disclose information in a variety of ways so as to be accessible to all groups, regardless of socio-economic or other status. For example, printed copies of reports were provided in central Sinop, in addition to on the internet; announcements have been made in local and national newspapers. All documents have been provided in Turkish. Additionally, at the community meeting held in Sinop to discuss the Scoping Report, a shuttle service was provided to transport interested stakeholders to and from the meeting (as it was held at a venue outside of central Sinop at the discretion of the MoEU).

6.3.3 Receiving Feedback from Stakeholders

South Stream Transport is committed to maintaining an open and respectful dialogue with all stakeholders, supported by the activities and principles of the SEP. Throughout the life of the Project, stakeholders have access to various means and opportunities to submit feedback to South Stream Transport. Feedback may include:

- Questions;
- Comments;
- Concerns;
- Requests;
- Complaints or grievances; and
- Suggestions and recommendations.

Stakeholder engagement activities comprise both 'active' and 'receptive' consultation. Active engagement includes meetings and structured comment periods to support report disclosure where South Stream Transport is actively soliciting feedback about the Project. Complementary to these active periods of disclosure and consultation, South Stream Transport is receptive to feedback, whereby stakeholders may contact the Project at any time (e.g. by email, post, telephone, or in person) to provide their views and ask questions. Feedback may be submitted by any individual or group (e.g. companies, organisations, societies, collectives), either verbally or in writing.

All input received from stakeholders is managed through the Stakeholder and Consultation Database (SCD; Section 6.3.4); through this platform, South Stream Transport centrally stores, analyses and manages comments from stakeholders. If a grievance is communicated to South Stream Transport, through any means, the communication is documented in the SCD, and the Grievance Procedure (Section 6.3.5) is initiated.

6.3.4 Stakeholder and Consultation Database

South Stream Transport's Stakeholder and Consultation Database (SCD) has been developed to ensure that all stakeholder communications are documented, that all feedback is recorded and

that all resulting actions are tracked and addressed². The SCD also provides a history of engagement with a particular stakeholder, thus helping South Stream Transport build meaningful relationships with stakeholders by understanding their concerns and past involvement with the Project.

The SCD is used to record and analyse feedback from stakeholders and, in turn, this analysis informs the development of Project design, the identification and management of impacts and the development of the Environmental and Social Management System (**Chapter 16 Environmental and Social Management**). Throughout the life of the Project, the SCD will be a valuable tool to coordinate information about stakeholders and stakeholder concerns in relation to the Project.

6.3.5 Grievance Procedure

A grievance is a complaint (i.e. an expression of dissatisfaction) stemming from an incident or impact (real or perceived) related to South Stream Transport's business activities. Complaints may stem from commonly occurring and relatively minor problems, or more serious one-off events, or entrenched or repeated problems that may lead to resentment, discontent or unrest.

A Grievance Procedure is the process by which a grievance is received, recorded and managed so that it can be tracked from its original submission through to a resolution. An effective Grievance Procedure is an important aspect of stakeholder engagement, and is a core component of the approach to stakeholder engagement outlined in the standards and guidelines for financing (Section 6.2.2). The process must be fair, accessible, transparent and properly documented.

The Grievance Procedure for the South Stream Offshore Pipeline will guide the management of grievances throughout the Project lifecycle, from before the start of construction, throughout the operational life of the Project, and into the Decommissioning Phase. The Grievance Procedure describes the process by which a grievance is documented, investigated, and resolved in coordination with the affected stakeholders. It will be implemented by South Stream Transport in partnership with its contractors and will ensure that grievances are brought to the attention of the appropriate Project staff and addressed in an appropriate and timely way.

The Grievance Procedure interfaces with the SCD and the general receipt and management of feedback from stakeholders. All communications with stakeholders will be respectfully considered by South Stream Transport, and responses will be provided where appropriate. Where a potential grievance is identified, the Grievance Procedure will be implemented in addition to standard stakeholder engagement procedures, although the two processes will be closely integrated.

² To preserve the confidentiality of personal data, the contents of the stakeholder database will not be disclosed to external parties, other than specific individuals or organisations that have a legitimate Project need to access this data and that have entered into a confidentiality agreement with South Stream Transport (e.g. select contractors of South Stream Transport).

Further information regarding the implementation of the Grievance Procedure is provided in the SEP.

6.4 Stakeholder Engagement by Project Phase

Stakeholder engagement activities are an integral part of the Project lifecycle: from the initial notification when the Project is proposed, to the scoping of potential impacts, the EIA and ESIA studies, and throughout the Construction and Pre-commissioning, Operational and Decommissioning Phases of the Project.

The different phases of the Project each require stakeholder engagement that is tailored in terms of its objectives and intensity, as well as the forms of engagement used. In Turkey, stakeholder engagement for the Project commenced at the beginning of the Development Phase; the Project is currently in this phase, which includes the EIA and ESIA studies. A summary of completed and planned engagement activities for the Project is provided in Figure 6.2.

Although the guidelines for stakeholder engagement under the EIA and ESIA processes differ, the Project has aligned these processes where possible. As such, the activities for both processes are described in this section.

A discussion of stakeholder feedback obtained through these activities including a short summary of the comments, suggestions and concerns raised by stakeholders to date, and how they have been addressed as part of the ESIA process is provided in Section 6.5.

6.4.1 Development Phase

6.4.1.1 Overview

At the time of writing, the Project is currently in the Development Phase, which includes both the development of engineering and design, as well as the EIA, ESIA and related studies. The Development Phase is an important period of stakeholder engagement as it provides an initial introduction with many stakeholders, and can provide valuable feedback for Project design, baseline studies, impact assessment, and mitigation and management planning. Stakeholder engagement during this phase aims to:

- Source and validate relevant environmental, socio-economic and cultural heritage data;
- Further understand the views and concerns of stakeholders about the Project, its impacts and possible mitigation, management and monitoring measures; and
- Discuss the outcomes of the EIA and ESIA processes, including anticipated impacts and their significance, and mitigation and management measures.

In terms of stakeholder engagement, the Development Phase includes the following activities:

- **Notification** of the Project and the commencement of the EIA and ESIA processes. With respect to stakeholder engagement in Turkey, this included introductory meetings with the Project's regulators, the Turkish MoEU and the Turkish Ministry of Foreign Affairs (MoFA) in

Figure 6.2 Stakeholder Engagement by Project Phase

PROJECT PHASE	ACTIVITIES	ENGAGEMENT OBJECTIVES
Development	<u>Project Notification</u> <ul style="list-style-type: none"> Preliminary engagement with national authorities including notification of South Stream Transport's intention to undertake an EIA and an ESIA. Preparation and submission of EIA Application File (EIAAF) 	<ul style="list-style-type: none"> Stakeholders, including regulatory authorities and the public, are aware of the proposed Project Start to build and maintain relationships between South Stream Transport and stakeholder groups Stakeholders are informed about the design and location of the project, and anticipated impacts Stakeholders can comment on the scope and content of the EIA and ESIA, and provide input into studies
	<u>Scoping Stage</u> <ul style="list-style-type: none"> Ongoing stakeholder engagement to support baseline studies, assessment of impacts, and mitigation and management strategies, and Project planning EIA Application File Disclosure of EIAAF on MoEU website Public Participation Meeting with stakeholders and Public ESIA Scoping Report Disclosure of the Scoping Report for review and comment by MoEU Public announcement of Scoping Report disclosure and comment period by MoEU Consultation meetings with key stakeholders and Public 	
	<u>EIA and ESIA</u> <ul style="list-style-type: none"> Ongoing stakeholder engagement to support baseline studies, assessment of impacts, and mitigation and management strategies, and Project planning EIA Report Disclosure of the EIA Report for review and comment by MoEU Public announcement of EIA Report disclosure and comment period Meetings with authorities ESIA Report Disclosure of ESIA Report for review and comment Public announcement of ESIA Report disclosure and comment period Meetings with stakeholders Response to all comments received 	
Construction and Pre-Commissioning (approx. 4 years)	<u>Construction and Pre-Commissioning Activities</u> <ul style="list-style-type: none"> Ongoing disclosure of information relating to Project development, including the timing and progress of construction activities Implementation of a Grievance Procedure and communication to stakeholders 	<ul style="list-style-type: none"> Stakeholders are kept informed about the Project and receive advance notification about activities that may affect them Stakeholders can submit questions, comments and grievances
Operational (approx. 50 years)	<u>Commissioning and Full Operational Activities</u> <ul style="list-style-type: none"> Continue to update stakeholders, particularly any changes or non-routine activities Continued implementation of the Grievance Procedure 	
Decommissioning	<u>Decommissioning Activities</u> <ul style="list-style-type: none"> Inform stakeholders about planned decommissioning activities and schedule Continued implementation of the Grievance Procedure 	

June and September 2012, and submission of an EIA Application File (EIAAF) in May 2013. These stakeholder activities are described in Section 6.4.1.2;

- The **Scoping** process included disclosure and consultation related to the national EIAAF and the international ESIA Scoping Report (publicly disclosed in July 2013) and associated consultation. These activities were completed in July and August 2013 and are described in Section 6.4.1.3;
- The **EIA Report** process included disclosure and consultation related to the draft EIA Report. These activities are described in Section 6.4.1.6; and
- The **ESIA Report** process includes disclosure and consultation related to this Report, in accordance with the standards and guidelines for financing. Planned activities are described in Section 6.4.1.8.

Additional stakeholder engagement activities related to baseline data collection are described in Section 6.4.1.4 and the inter-governmental agency of the Black Sea Commission in Section 6.4.1.7.

6.4.1.2 Completed Activities – Notification

Introductory meetings were held with the MoEU on 11 June 2012 and with the MoFA on 6 September 2012, to inform them about the Project and to notify them of the intention to conduct an EIA and ESIA, and to establish permitting requirements for the Project³. The official EIA process began with the submission of the EIAAF in May 2013.

6.4.1.3 Completed Activities – Scoping Process

During the Scoping process, South Stream Transport sought to provide stakeholders with clear information about the Project and its potential impacts and to allow them to provide feedback on the scope of, and approach to, the EIA and ESIA, including the key issues to be addressed as part of both processes. The engagement process during the Development Phase also served to source and validate relevant environmental, socio-economic and cultural heritage data and to understand the views and concerns of stakeholders about the Project, its impacts and possible mitigation, management and monitoring measures. Feedback from these activities informed the EIA and ESIA process and Project design.

Consultation on the Content and Format of the EIA Report

The public engagement process officially commenced on 5 June 2013, when the MoEU published an announcement on their website⁴, to inform stakeholders that the EIAAF had been disclosed and was available for review and that comments, views and recommendations could

³ Note however, that the first communication with MoFA regarding the Project was undertaken at intergovernmental level, between MoFA and the Russian Ministry of Foreign Affairs. A 'Permit' letter outlining the conditions and requirements the Project must fulfil was issued to the Russian Federation Embassy on 28 December 2011. This is included in Appendix 6.1: Engagement Activities to Date.

⁴ Available from <http://www.csb.gov.tr/db/ced/editordosya/karadenizTRmayis2013.pdf>

be submitted to the MoEU. A similar announcement was made on 12 June 2013 by the Sinop Provincial Directorate of Environment and Urbanisation (PDEU) on their website⁵, once the MoEU had confirmed Sinop to be the location for a public meeting ('Public Participation meeting') on the EIAAF.

The Public Participation meeting was held in Sinop at the Vira Hotel on 2 July 2013 at 10 am under the chairmanship of the PDEU and with the participation of representatives of the MoEU and South Stream Transport (Figure 6.3). The MoEU invited relevant authorities and organisations to attend the meeting. The meeting was advertised in one national and one local newspaper⁶ on 21 June 2013 ten days prior to the meeting as legally required by the EIA process. Transport arrangements were made to enable other stakeholders and the general public to participate in the meeting.

Figure 6.3 Presentation and Panel at Public Participation Meeting in Sinop



Public turnout to the meeting was low, which can be attributed to the distance of the Project from the Turkish coastline (minimum 110 km) and the limited impacts envisaged, resulting in relatively low levels of interest among the general public and NGOs.

Following the presentation, stakeholders were invited to ask questions, to which representatives of South Stream Transport provided answers (Figure 6.4). All questions, comments and

⁵ Available from <http://www.csb.gov.tr/iller/sinop/index.php?Sayfa=duyurudetay&Id=2642>

⁶ The national paper was the "Hurriyet" and the local was the "Bizim Karadeniz", the date of publication of both was 21 June 2013.

recommendations raised during the Public Participation meeting and via email and postal correspondence were collected by the MoEU for consideration with regard to the scope and contents (i.e. the Special Format) of the EIA Report.

Figure 6.4 Project Panel at Public Participation Meeting in Sinop



Comments received during the Public Participation meeting are considered in this ESIA Report and are shown in Appendix 6.1: Comments Received during the Development Phase.

Following the Public Participation meeting in Sinop, the EIA SSFD Meeting was held on 4 July 2013 by the MoEU and the REC comprising various Turkish authorities with jurisdiction over aspects of the Project. The purpose of the SSFD meeting was to discuss, with South Stream Transport present, the scope and content of the EIA, and any requirements which should be taken into consideration in the EIA process or EIA Report. Although this meeting was primarily about setting the format for the EIA Report, some of the comments raised are also relevant to the ESIA Report and have therefore been considered and are presented in Appendix 6.1.

As some of the REC members were not present during the SSFD Meeting, or did not provide formal feedback, additional meetings were held with relevant REC members and correspondence exchanged between August and November 2013, in order to receive feedback on the scope and contents of the EIA Report.

Disclosure of the ESIA Scoping Report

To ensure the Scoping Report was accessible to all stakeholder groups, efforts were made to disclose information in a variety of ways. All interested stakeholders had the opportunity to submit comments on the Scoping Report, whilst some specific stakeholders were invited to attend meetings to discuss the Project and the Scoping Report.

The Scoping Report, which included a non-technical summary (NTS), was disclosed on 17 July 2013 and the consultation period ran until 19 August 2013. Disclosure of the Scoping Report included:

- Publication of the Scoping Report and NTS, in English and Turkish, on the South Stream Transport website at <http://www.south-stream-offshore.com/esia> on 17 July 2013;
- A public announcement published in national, regional and local newspapers⁷ including details of the Project and South Stream Transport, the ESIA and how comments on the Scoping Report could be submitted (i.e. by email, post, or comment box) until 19 August 2013. An example of this announcement is provided in Figure 6.5; and
- Direct distribution of printed and bound copies of the Scoping Report and NTS to identified stakeholders by post and email.

The Scoping Report was made publicly available for review and comment for a period of 30 days; during this period, stakeholders had the opportunity to review and comment on the report, the Project, and the proposed scope and content of the ESIA Report.

A comment box was installed in Sinop on 17 July 2013 until 19 August 2013 in the Sinop Muhtar's office⁸ where the public were invited to review a hard copy of the report and submit comments by posting into the box (Figure 6.5). Sinop was chosen as a location to host a comment box in order to give any interested stakeholders who were unable to participate in the EIA Public Participation meeting an additional opportunity to submit comments on the Project.

Through the various channels, comments were submitted by post, email, comment box or in person. The issues raised during this consultation period (Appendix 6.1) have been considered in this ESIA Report. The disclosure of the Scoping Report is summarised in Table 6.2.

⁷ The national newspaper was "Hürriyet" (Istanbul), the regional newspapers were "Samsun Haber Gazetesi" and "Trabzon – Karadeniz", and the local newspaper was "Sinop Bizim Karadeniz" (Sinop). Disclosure in "Hürriyet" and "Samsun Haber Gazetesi" on 17 July 2013 and in "Sinop Bizim Karadeniz" and "Trabzon – Karadeniz" on 18 July 2013.

⁸ A Muhtar is the elected village head in villages of Turkey. In cities, likewise, each quarter has a muhtar, but with a slightly different status.

Figure 6.5 Public Announcement in “Hürriyet” on 17 July 2013 and Comment Box in Sinop with Public Announcement, Instructions, Hard Copy Reports and Comment Forms

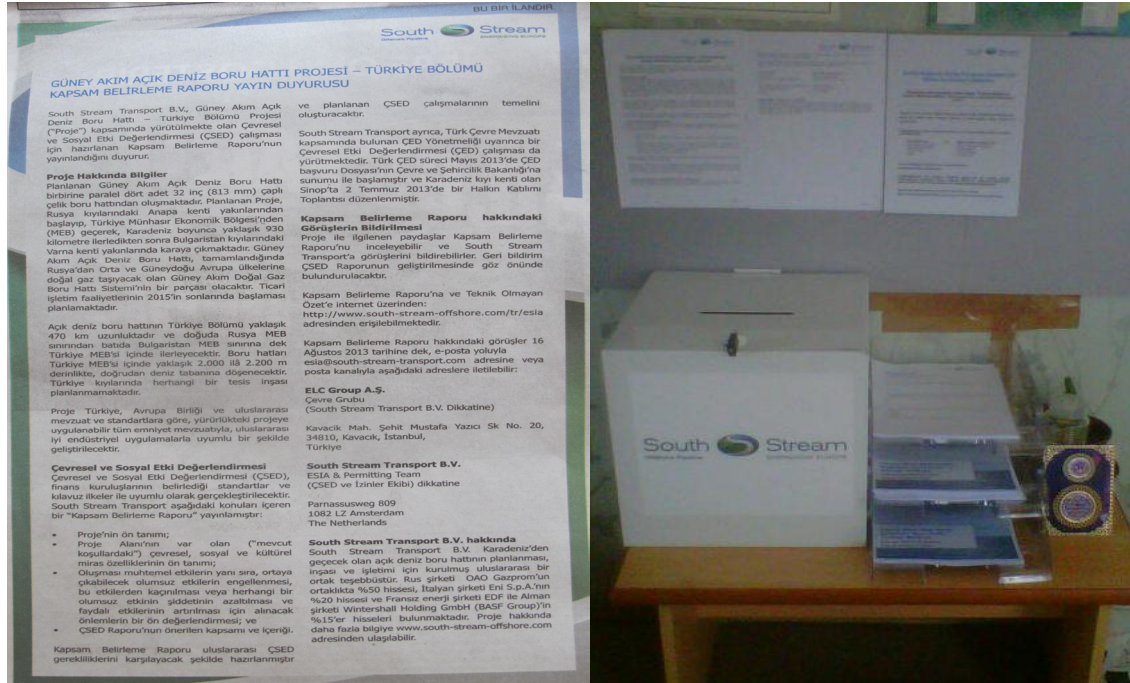


Table 6.2 Disclosure of Scoping Report (including NTS)

Stakeholder Group	Means of Disclosure
All stakeholders and members of the public with internet access	South Stream Transport website in Turkish and English
Community of Sinop	Printed and bound copies made available in Turkish in Sinop at the Sinop Muhtar's Office with comment forms and comment box
Fishing cooperatives in Ankara, Sinop, Samsun and Trabzon	Hard paper copies in Turkish posted or emailed to the head of the cooperative who then shared with members
National, regional and local NGOs and marine-focused academic and scientific research organisations in Istanbul, Ankara, Sinop, Samsun and Trabzon	Digital copies in Turkish sent by email
Business and business associations in Trabzon and Sinop	Digital copies in Turkish sent by email
National Turkish Authorities	Hard paper copy and CD posted to MoEU and MoFA

Scoping Consultation Meetings

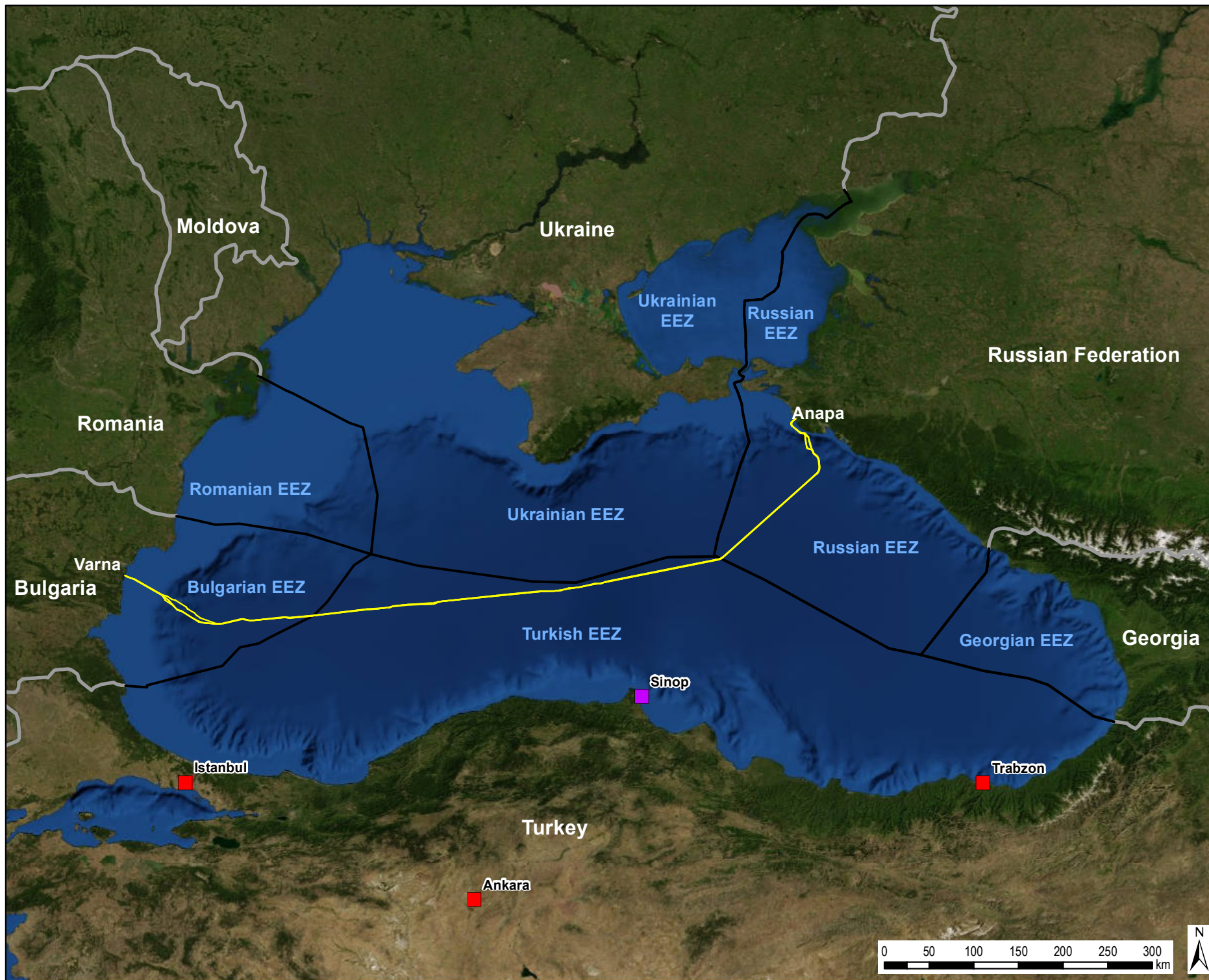
As the Project is more than 110 km offshore and impacts are marine-related, the impacts on Black Sea coastal communities and stakeholders are expected to be minimal. A targeted engagement programme involved identifying key stakeholders who could have an interest in the Project, in both the business centres (i.e. Istanbul and Ankara) and along the Black Sea coast. The locations where meetings were held for the EIA and where meetings were held for the ESIA are shown in Figure 6.6.

National NGOs, research institutes, business associations and fishing cooperatives with a specific focus on the Black Sea region and/or marine environments were identified as stakeholders to engage for the ESIA. At a local level, as a public meeting had already taken place on 2 July in Sinop for the EIA and attendance was low, it was not considered necessary to hold another meeting in Sinop for the ESIA Scoping Report disclosure. Instead, Trabzon, which accounts for 20% of the total fish production in Turkey (Ref. 6.12), was identified as an important town to visit and engage with key marine research institutes and fisheries cooperatives.

In total, four roundtable meetings were held in Istanbul, Ankara and Trabzon in July and August 2013. Invitation letters were sent to stakeholders with the full Scoping Report and NTS by email and post on 12 July 2013, just over two weeks prior to the meetings taking place, to allow time for stakeholders to review the materials prior to the meetings. The meetings are described below and are listed in Table 6.3. The details of invitees and attendees are contained in Appendix 6.2.

Table 6.3 Scoping Consultation Meetings

Meeting	Stakeholders Invited	Date	Attendance	Location
1. Roundtable Meeting	National NGOs and marine research institutes	30 July 2013	6 invited, 2 attended	Point Hotel Barbaros, Istanbul
2. Roundtable Meeting	National NGOs, marine research institutes and the Central Fisheries Cooperatives Union	31 July 2013	7 invited, 4 attended	Movenpick Hotel, Ankara
3. Roundtable Meeting	Marine research institutes and business associations	1 August 2013	5 invited, 3 attended	Zorlu Grand Hotel, Trabzon
4. Roundtable Meeting	East Black Sea Fisheries Cooperatives Union	1 August 2013	Head of Union and 21 affiliate cooperatives invited, 3 representatives of the main union attended	Fisheries cooperative premises, Trabzon



LEGEND

- Location of EIA public participation meeting
- Location of stakeholder engagement consultations
- Exclusive Economic Zone boundary
- Country Boundaries

Turkish Sector of the South Stream Offshore Pipeline

- Proposed offshore pipelines

Projection: Lambert Conformal Conic
 Purpose of Issue: For Information
 Client: **South Stream**
 Offshore Pipeline: **ENERGISING EUROPE**
 Project Title: **SOUTH STREAM OFFSHORE PIPELINE**
 Drawing Title: **STAKEHOLDER ENGAGEMENT CONSULTATIONS IN TURKEY**

Drawn AH	Checked RW	Approved MW	Date 04/06/2014
URS Internal Project No. 46369082		Scale @ A4 1:5,500,000	

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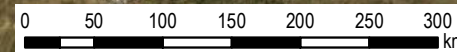


Figure 6.6

Three out of the four meetings were held in private hotel meeting rooms located in central locations in Istanbul, Ankara and Trabzon to ensure accessibility to stakeholders. The exception was the meeting with the East Black Sea Fisheries Cooperatives Union in Trabzon, which was held on their own premises as it was more accessible to its members. South Stream Transport decided to hold a separate meeting the East Black Sea Fisheries Cooperatives Union, instead of combining with the meeting with marine research institutes and the Trabzon Chamber of Commerce and Industry, as it was considered that their interests and questions concerning the Project could differ and holding two meetings would ensure that engagement was tailored to the interests of the stakeholders.

Representatives of South Stream Transport presented information about the Project, the Scoping Report and the ESIA process, followed by a 'Question and Answer' session (Figure 6.7). The meetings were organised to facilitate the exchange of information and opinions, and allowed representatives of South Stream Transport to answer questions and to listen to stakeholder views and concerns related to the ESIA process, anticipated Project impacts and proposed mitigation measures.

Figure 6.7 Roundtable Meeting in Istanbul



At all four meetings (Figure 6.8 and Figure 6.9), visual and printed materials were made available to support the presentations and discussion, including additional copies of the Scoping Report and the NTS, as well as leaflets describing the Project and the ESIA process.

Figure 6.8 Presentation, Panel and Project Information Display at Roundtable Meeting in Istanbul



Figure 6.9 Roundtable Meeting in Ankara



There were also visual displays illustrating various aspects of the Project and the ESIA process. Translation was provided (Turkish and English) where necessary.

Representatives of the various stakeholder groups were invited to provide comments and suggestions both in the meeting itself and afterwards by filling out a Comment Form or submitting comments via the Project ESIA email address or by post. Participants also had the opportunity to speak individually with representatives of South Stream Transport after the question and answer sessions were finished.

Details of all discussions were documented by South Stream Transport and informed later stages of the EIA and ESIA, planning and design.

Overall, the meetings were positive, with stakeholders willing to contribute constructively and provide their feedback in a dialogue with the Project. However, the turnout to the meetings was low which can be attributed to the distance of the Project from the Turkish coastline and the relatively limited impacts envisaged, resulting in low levels of interest among stakeholders.

The most frequently raised comment by stakeholders was related to impacts on fish, particularly migratory species of commercial importance to Turkish fisheries. The issue of safety, and the response plans in place to deal with an unplanned event such as a gas leak or vessel collision, was also raised. Other comments related to impacts on the marine environment and environmental protection, and the stakeholder engagement and ESIA process in general.

The comments made in these discussions are described in Section 6.5 and Appendix 6.1 shows where they are discussed in this ESIA Report.

In addition to the ESIA public consultation activities, courtesy hard copies of the Scoping Report and NTS were submitted to the MoEU and MoFA for review and they were invited to comment in writing. Representatives of South Stream Transport were available to meet with the authorities if they wished to discuss the Report directly. However, no comments or meeting requests were received.

6.4.1.4 Completed Activities – Interim ESIA Consultations

Project updates were sent to stakeholders who participated in the Scoping meetings in May 2014. In addition, meetings were held with the East Black Sea Fisheries Cooperative Union (based in Trabzon) and the Samsun Union of Fisheries Cooperatives to provide them with an update on the Project, disclose the findings of the Fisheries Study (see Appendix 9.1), and discuss their preferences regarding the disclosure of the ESIA Report and associated consultations. The Sinop Union of Fisheries Cooperatives were also consulted by phone call during this time to elicit their preferences for the ESIA Report disclosure.

6.4.1.5 Completed Activities – Data Collection Meetings

Representatives from South Stream Transport also held meetings with the Turkish authorities to provide updates on the Project, discuss technical issues and gather baseline data and information to input into the EIA and ESIA reports. Although feedback from these meetings related mainly to the EIA process, the comments relevant to the ESIA are summarised in Section 6.5 and a full list of comments is provided in Appendix 6.1.

Further to the feedback received during the Scoping process, efforts were also made to contact fishing cooperatives unions and marine research institutes to gather further information and data on Turkish fishing activity in and around the Project Area. This engagement was undertaken primarily by email and phone. Further information on Turkish fishing was also received during the interim ESIA consultation meetings with fisheries in Trabzon and Samsun in May 2014.

6.4.1.6 Completed Activities – National EIA Report

The draft EIA Report was submitted to the MoEU on 28 November 2013 in accordance with Turkish EIA requirements. The MoEU and Sinop PDEU disclosed the draft EIA Report on 19 December 2013 and announced the commencement of the 'review and evaluation process'. Under the Turkish EIA requirements, further Public Participation meetings on the draft EIA Report are not required, unless specified by the MoEU. Due to the lack of public interest to date, public consultation on the draft EIA Report was limited to website disclosure.

The draft EIA Report was published on the MoEU's website (<http://www.csb.gov.tr>) and printed copies were available for review on request and the Sinop PDEU office. Stakeholders could review the EIA Report and submit comments up to the time of the EIA Review and Evaluation meeting. The MoEU are responsible for collecting all comments received during this period to be considered at the Review and Evaluation meeting and incorporated into the EIA Report by the Project Proponent where necessary. However, the Project understands that no additional comments were received from the public during this period.

The EIA Review and Evaluation meeting was held on 8 January 2014. The majority of the REC members' opinions considered the draft EIA Report to be satisfactory in terms of the assessment and proposed mitigation measures. South Stream Transport was requested to provide more data from the marine surveys carried out in 2011 and 2012, and reach an agreement on the crossing of oil and gas exploration blocks, before submitting the final EIA Report. It was determined that a second EIA Review and Evaluation meeting was not necessary.

The final EIA Report was submitted to the MoEU on 9 May 2014 and was published via the website of the MoEU and Sinop PDEU. Stakeholders will have the opportunity to review the final report and submit any final comments to the MoEU or PDEU prior to the approval of the EIA Report.

6.4.1.7 Completed Activities – Black Sea Commission

In November 2012, an introductory meeting was held with the Permanent Secretariat of the Commission on the Protection of the Black Sea Against Pollution in Istanbul to inform them about the South Stream Offshore Pipeline. This meeting discussed the EIA/ESIA process of the entire South Stream Offshore Pipeline as well as transboundary aspects, particularly in relation to relevant Conventions, such as Espoo and Aarhus.

At the request of the Permanent Secretariat, South Stream Transport sent a follow up letter and presentation to the Permanent Secretariat in November 2012 containing further information about the South Stream Offshore Pipeline to be distributed to members of the Black Sea Commission during its Annual Meeting in the same month. South Stream Transport has

provided courtesy updates to the Permanent Secretariat at regular intervals regarding the status of the EIA and ESIA processes in each of the affected countries (Appendix 6.2: Engagement Activities to Date).

6.4.1.8 Planned Activities – ESIA Disclosure and Consultation

The consultation programme for this draft ESIA Report has considered the combined outcomes of both EIA and ESIA engagement activities to date. An overview of the draft ESIA Report engagement programme is presented below, whilst the SEP contains more detailed information on the engagement programme. The SEP is available on the South Stream Transport website, and copies will also be made available for review during the ESIA disclosure period.

The focus of further engagement activities during the ESIA process is to ensure that stakeholders are provided with the opportunity to:

- Access clear and appropriate information (i.e. non-technical, local language) information on the Project and its potential impacts;
- Provide feedback on the content of the ESIA including the assessment of impacts, and the proposed mitigation, management and monitoring measures; and
- Provide input regarding plans for future engagement activities, including preferences for methods, materials and schedule.

Whereas the legal provisions for public consultation and disclosure for the national EIA process end following the 'review and evaluation process' of the draft EIA Report, for the international ESIA process, engagement goes beyond ESIA Report disclosure and consultation and continues during the Construction and Pre-Commissioning, Operational and Decommissioning Phases of the Project. This reflects the recognition that relationships with stakeholders are on-going throughout the life of a project and on-going engagement will ensure that stakeholders are consulted about activities that may affect them at any stage of a project.

This draft ESIA Report has been publicly disclosed, along with an NTS of the Report. These documents are available online at www.south-stream-offshore.com, along with information about upcoming stakeholder engagement activities and the ways in which stakeholders can provide comments on the Project and the ESIA Report. Announcements have been made through local and national media. Documents and announcements have also been provided directly to the key stakeholders identified to date.

Alternatively, interested stakeholders can contact South Stream Transport to request a copy of the ESIA Report, NTS, or other information via the communication channels shown in Table 6.4.

Stakeholders have the opportunity to comment in writing and to attend public meetings in Istanbul, Ankara and Trabzon to discuss the Project, the draft ESIA Report and related documentation. The public meetings will allow stakeholders to express their views and ideas about the Project and the ESIA to representatives of South Stream Transport and the ESIA consultants, as well as to provide additional information or suggestions to assist the ESIA process. A public meeting is not planned for Sinop, as stakeholder interest in the Project in this location has thus far been low.

Table 6.4 Contact Information

South Stream Transport B.V.	Email: esia@south-stream-transport.com
	Website: www.south-stream-offshore.com
	Phone: +31 (20) 262 4500
	Fax: +31(20)524 1237
	Post: ESIA & Permitting Team, Parnassusweg 809, 1082 LZ, Amsterdam, Netherlands

Fisheries in Trabzon and Samsun have indicated that they have sufficient information about the Project and its potential impacts, therefore do not consider additional consultations on the ESIA Report to be necessary. Copies of the ESIA Report and NTS, have been provided to the cooperatives to distribute among their members as well as appropriate means of providing feedback on the Project, and additional consultation meetings will be scheduled upon their request. Similarly, ESIA documentation has been provided to fisheries cooperatives in Sinop and they have indicated that they may request a separate ESIA consultation after reviewing the report.

Comments received on the draft ESIA Report will be taken into consideration in the preparation of the final ESIA Report. The final ESIA Report will be disclosed on the South Stream Transport website and will inform later phases of the Project.

6.4.2 Construction and Pre-Commissioning, Operational and Decommissioning Phases

Stakeholder engagement will continue over the life of the Project throughout the Construction and Pre-commissioning, Operational and Decommissioning Phases. With an operational life of 50 years, South Stream Transport is committed to maintaining relationships and communications with stakeholders over this time.

Once the ESIA process is complete, subject to the necessary approvals and permissions, the Project moves to the next phase: Construction and Pre-Commissioning. During this phase, and in subsequent phases, the emphasis of engagement shifts to focus on consultation and disclosure about activities that are ongoing or about to take place, and receiving feedback from stakeholders about ongoing activities.

Engagement activities will include published announcements and updates about the progress of the Project. The Grievance Procedure will also be a key element of the Construction and Pre-Commissioning Phase and later phases of the Project. Plans for ongoing stakeholder engagement are described in more detail in the SEP, which will be updated as the Project progresses. Engagement activities will be adjusted to reflect evolving stakeholder preferences and concerns over the life of the Project.

6.5 Stakeholder Comments and Suggestions

6.5.1 Overview

This section summarises the comments and suggestions received from stakeholders during the EIA and ESIA consultation processes to date and how these comments have been considered and responded to in this ESIA Report. The feedback received has been divided into that from:

1. The competent authorities i.e. Turkish national, regional and local government, primarily gathered during meetings related to the EIA process and summarised in Section 6.5.2; and
2. The public and non-governmental stakeholders (e.g. fisheries and marine area users, NGOs, Inter-governmental organisations, fisheries unions and cooperatives, academic and scientific organisations) engaged primarily through the ESIA process and summarised in Section 6.5.3.

A full list of the comments received is provided in Appendix 6.1.

6.5.2 Competent Authorities

Throughout the course of the Project, South Stream Transport has maintained a continual and open dialogue with the Turkish authorities.

The two key stages of engagement with Turkish competent authorities were the EIA SSFD meeting in July 2013 and the EIA Report Review and Evaluation meeting in January 2014. In addition, a number of introductory meetings were held with competent authorities to introduce the Project and to discuss aspects of procedures relating to the EIA and permitting processes. Ongoing engagement has also occurred with members of the EIA REC to receive information and data primarily for the EIA Report, but which also acted as input for this ESIA Report.

Of the engagement with competent authorities to date, the most frequently cited topics have concerned:

- The protection of cultural heritage objects (CHOs; namely, shipwrecks) in the Turkish EEZ;
- Ensuring that the Project does not affect commercial fishing activity;
- Ensuring that appropriate measures are taken to ensure navigational health and safety, and to respond to emergency or unplanned events (e.g. a spill or gas leak);
- Appropriate coordination with authorities responsible for oil and gas exploration in the Turkish Black Sea; and
- Appropriate measures to manage waste generated by the Project.

The key comments, of relevance to the ESIA processes, are summarised in Table 6.5, along with an explanation of how the Project has considered and responded⁹ to each comment. Further details are provided in the relevant chapters of the ESIA Report.

Table 6.5 Comments Received from Competent Authorities

Comments	Consideration and Response
<i>Approval and Authority Involvement</i>	
Clarifications regarding the sharing of survey data with Turkish authorities and scientific institutions.	All survey data accrued by the Project has been shared with the MoFA, who are authorised to share this data with the relevant Turkish authorities and institutions. The same procedure will apply to any future survey data that is gathered.
<i>Cultural Heritage</i>	
The Project must avoid damage to any identified CHOs. Turkish authorities must be informed immediately of potential CHOs identified during survey or pipe-laying activities.	The Project has notified the MoFA and the Ministry of Culture and Tourism (MoCT) of all potential CHOs identified within the 2 km survey corridor in the Turkish EEZ, and provided the relevant data to this effect. The Project has committed to avoiding all known CHOs by 150 m thus limiting any potential for adverse impacts on these objects. This avoidance strategy has been communicated to the MoFA and MoCT. The MoCT had recommended an avoidance buffer of 100 m from known CHOs. Should any previously unknown CHO be encountered during construction, the Project will implement the Project chance find procedure and inform the relevant Turkish authorities. Further details can be found in Chapter 10 Cultural Heritage .
<i>Design and Schedule</i>	
What is the duration of the construction phase in the Turkish EEZ?	Construction activities are planned to run from early 2015 to mid-2017 in the Turkish Sector. The timeline for construction can be found in Chapter 5 Project Description . This timeline has been communicated to the Turkish authorities and has also been contained in the EIAAF, Scoping Report and EIA documentation. The relevant Turkish authorities will be informed of any changes in the construction timeline.

Continued...

⁹ Note that the responses provided are intended to be technically correct at the time of writing. Due to the evolution of Project planning, design and schedule, this may not be the same as the response that was provided at the time the question or concern was raised.

Comments	Consideration and Response
How will the pipelines be laid and will any equipment or materials be used to stabilise the pipeline on the bottom of the seabed.	The pipelines will be laid directly on the seabed. The pipe-lay technique is described in Chapter 5 Project Description where it is also confirmed that no excavation or filling (seabed intervention) will be required in the Turkish Sector. This information has been communicated to the Turkish authorities and has also been contained in the EIA documentation.
What would happen in the event of a gas leak, and how will such a leak be detected?	The pipelines will be continually monitored, in real time, from the landfall facilities in Russia and Bulgaria and at a control room in Amsterdam. In the unlikely event of a leak, the pipeline would be shut down immediately. The ESIA includes an assessment of potential impacts associated with unplanned events such as a gas leak in Chapter 13 Unplanned Events . This information has been communicated to the Turkish authorities and has also been contained in the EIAAF, Scoping Report and EIA documentation.
What is the procedure for undertaking repair work to the Pipeline?	Although the probability of failure of a properly designed and installed deep-water pipeline is negligible, South Stream Transport will employ an Emergency Pipeline Repair Strategy (EPRS) for the South Stream Offshore Pipeline to be utilised in the event of damage to any of the pipelines. Further information can be found in Chapter 5 Project Description .
Environmental Protection (Marine)	
The Project must undertake an assessment into the potential impacts on pelagic migratory fish species, and impacts on commercial fishing activities in the Turkish Black Sea.	South Stream Transport has assessed impacts on Turkish fishing activity. An international specialist company from the UK conducted a fisheries study for the Project. Local fishing workers, Turkish fisheries experts and the Turkish Ministry of Food, Agriculture and Livestock have been consulted during the ESIA process to assess fishing and migratory issues. The fisheries study examined the migratory routes of commercially important fish species. Of these, only the anchovy was known to migrate through the Project Area. No significant impacts are expected on fish migrations or fishing activity in the Turkish EEZ. Further detail can be found in Appendix 9.1 Fisheries Study and in Chapter 9 Socio-Economics . This information has been communicated to the Turkish authorities and has also been contained in the EIA documentation.

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Comments	Consideration and Response
Compensatory measures should be in place for any pollution caused within the Turkish EEZ, or any pollution related to transboundary incidents from the Russian and Bulgarian Sectors of the South Stream Offshore Pipeline.	<p>In the unlikely event of a significant pollution incident within the Turkish EEZ, or related transboundary impacts, which are a direct result of the construction and operational activities of the South Stream Offshore Pipeline, necessary actions will be taken to compensate any damages in Turkey's maritime jurisdiction, covering the Turkish EEZ, territorial waters and coast, in coordination with the relevant authorities. A commitment to this effect has been included in the EIA Report.</p> <p>Further information on the mitigation and management plans to minimise the potential for such events, and respond to them should they occur, can be found in Chapter 13 Unplanned Events and Chapter 16 Environmental and Social Management.</p>
Owing to the special status of the Black Sea marine environment, the Project must ensure that waste is managed in accordance with applicable national and international regulations.	<p>Project vessels will comply with MARPOL requirements and national regulations. This has been discussed and approved with the relevant Turkish authorities during the EIA process and has also been contained in the EIAAF, Scoping Report and EIA documentation. Further information on waste management can be found in Chapter 12 Waste Management.</p>
The Project should undertake monitoring throughout the lifetime of the Project to manage potential impacts on the environment.	<p>Monitoring requirements for the Project are specified in the technical chapters of this ESIA Report. Monitoring requirements for the Project were also discussed and agreed with the MoEU as part of the EIA process, and are included in the EIA documentation.</p>
Health and Safety	
Emergency Response Plan must be prepared by the Project, in coordination with relevant Turkish authorities.	<p>Emergency Response Plans (ERPs) will be prepared for the Project by the construction contractor. South Stream Transport will ensure that contractors' ERPs are integrated with other Project response plans, including South Stream Transport's overarching Emergency Preparedness and Response Plan. An Emergency Response Plan and Risk Assessment is also being prepared by a licensed Turkish institution as requested by the MoEU and forms part of the EIA approval process. This plan will feed into the Project's overarching Emergency Preparedness and Response Plan. Further information can be found in Chapter 13 Unplanned Events and Chapter 16 Environmental and Social Management.</p>

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Comments	Consideration and Response
Advance coordination of activities with relevant authorities to take necessary measures regarding safety of lives, goods, navigation and environment prior to the start of construction activities.	Ongoing engagement has been undertaken with relevant maritime authorities including the Ministry of Transport, Maritime Affairs and Communications, Turkish Coast Guard, and Turkish Naval Forces to inform them of Project activities and receive feedback to inform necessary navigational measures and procedures. Such engagement will continue up to and during the construction period. Regular notifications will be issued to relevant maritime authorities informing them of the location of the construction spread.
<i>Project Location, Routing and Alternatives</i>	
What is the reason for routing the Pipeline through the Turkish EEZ?	The proposed Pipeline route in Turkey was influenced by the selected locations of the landfalls in Russia and Bulgaria and the location of continental slope crossings. The route from Anapa (Russia) to Varna (Bulgaria) via the Turkish EEZ proved to be the most viable based on commercial, environmental, socio-economic and technical criteria. No significant engineering, environmental or social constraints were identified in Turkish waters and as such direct line routes were initially adopted within the preferred corridor. The routing through the Turkish EEZ is also subject to two bilateral agreements between the Turkish Government and the Russian Government. These agreements specify the conditions to be met for the construction of the Project. Further information can be found in Chapter 2 Policy, Regulatory and Administrative Framework and Chapter 4 Analysis of Alternatives .
There are areas within the Black Sea where unexploded ordnance are dropped. These areas are known by the military forces of the countries surrounding the Black Sea. Although these areas are not within the South Stream Transport Project Area, the Project should remain aware of these areas and avoid them during construction.	The Project has engaged with relevant marine authorities in Turkey concerning military areas and dumping grounds for unexploded ordnance. South Stream Transport will carry out a unexploded ordnance (UXO) survey along the route in the Turkish EEZ well in advance of pipe-laying, to confirm that there are no UXOs along the Project route. A UXO clearance plan (if required) will be developed by South Stream Transport in close conjunction with the relevant authorities at the appropriate time.

Continued...

Comments	Consideration and Response
Issues related to the crossing of oil and gas license blocks, in particular potential hindrances this may pose to potential exploration or drilling activities.	Turkish Petroleum Corporation (TPAO) is responsible for oil and gas license blocks through which the Project passes, and has been engaged throughout the EIA and ESIA processes. In response to concerns raised by TPAO regarding the width of the pipeline route, route optimization has been undertaken to reduce the overall width of the Project footprint to 420 m, which includes the four pipelines and a safety zone either side of the outermost pipelines, in order to comply with TPAO's requests in this regard.
The interface between the Project and potential military exercise areas during construction should be evaluated. South Stream Transport should be informed of exercise periods and provide notifications to relevant parties for marine/navigation safety.	The Project is known to cross a designated military exercise area. Notifications of pipe-lay vessel movements will be regularly issued to the relevant Turkish authorities during construction, and this commitment is captured in the EIA documentation.

Complete.

6.5.3 Public and Other Non-Governmental Stakeholders

This section summarises the feedback received from the public and other non-governmental stakeholders (e.g. marine area users including fisheries, NGOs, inter-governmental organisations, academic and scientific organisations) who were invited to provide comments during:

1. The EIA Application File disclosure and consultation period, including the Public Participation Meeting¹⁰; and
2. The ESIA Scoping Report disclosure and consultation period.

Feedback from the public and non-governmental stakeholders during the EIAAF disclosure and consultation period was minimal and included four comments raised at the Public Participation Meeting in Sinop. Feedback during the Scoping Report disclosure and consultation period was received through a series of roundtable meetings and in writing. Whilst stakeholders also had the opportunity to provide comments and suggestions outside of these official periods by contacting South Stream Transport or its consultants by telephone, email or post, no further public comments have been received to date.

The most common topics raised included the following:

- Potential impact of the Project on fish (such as anchovy), and seasonal migration patterns in particular, and the potential impact on fisheries;

¹⁰ No public comments were received by the MoEU or PDEU as part of the national EIA process.

- Questions regarding the safety of the Pipeline and the risks of unplanned events such as gas leaks or vessel collisions, as well as the safety measures that would be put in; and
- Questions about potential impacts on the marine environment, unplanned events, and environmental protection.

Stakeholder feedback is summarised in Table 6.6, which contains a summary of the main comments, issues and questions raised by stakeholders and how these have been considered and responded¹¹ to by the Project. A full list of all comments raised is provided in Appendix 6.1.

Table 6.6 Summary of Public and Other Stakeholder Comments

Comments	Consideration and Response
<i>Environmental Protection (Marine)</i>	
Fishery organisations are especially dependent on catch in the Black Sea region and highlighted the importance of the migratory routes of certain commercially important fish species. Questions about the planned construction schedule, and whether this will impact on the anchovy migration period and Turkish fishing activity.	<p>South Stream Transport has assessed potential impacts on Turkish fishing activity. An international specialist company from the UK prepared a separate fisheries study for the Project which can be found in Appendix 9.1 of this ESIA Report. Local fishing cooperatives, Turkish fisheries experts and the Turkish Ministry of Food, Agriculture and Livestock have been consulted during the ESIA process to assess fishing and migratory issues.</p> <p>The potential interaction between the construction schedule and the migration of anchovies across the Project area has been considered in the EIA and ESIA Reports. This included an assessment of the potential impact of underwater noise on anchovy migration. No significant impact on fish migrations, or fisheries activities, in the Turkish EEZ is expected. Impacts on fishing are assessed in Chapter 9 Socio-Economics, while impacts on fish are assessed in Chapter 8 Biological Environment. The conclusions of the fishing study have also been communicated in the EIA documentation.</p>

Continued...

¹¹ Responses to comments or questions raised at meetings were provided to the stakeholder at the time. The responses provided below are intended to be technically correct at the time of writing. Due to the evolution of Project planning, design and schedule, this may not be the same as the response that was provided at the time the question or concern was raised.

Comments	Consideration and Response
<p>Need to consider potential impacts from invasive species entering the Black Sea and the management of the discharge of Project ballast waters into the Black Sea.</p> <p>Questions about where the pipes and pipe-laying vessels will come from, and if the vessels are coming from outside the Black Sea, will they empty ballast water into the Black Sea.</p>	<p>Given the historic issues with invasive species within the Black Sea, South Stream Transport understands that the issue of ballast water management is of high importance to this region. The issue of ballast water discharges has been discussed in the EIAAF, Scoping Report and EIA documentation. Project vessels will voluntarily adopt the International Maritime Organisation (IMO) Ballast Water Convention and will have a ballast water management plan as part of the environmental and social management plans drafted for the Project. Further information is contained in Chapter 13 Unplanned Events.</p>
<p>Question about disturbance to seabed sediments from pipe-laying and whether this could potentially impact the marine environment.</p>	<p>Sediment characterisation surveys were conducted in 2011. The depth and low concentration of heavy metals and contaminants, as well as the distance from ecological receptors, means that South Stream Transport does not expect a significant impact on water or sediment quality.</p> <p>Pipes will be laid directly onto the seabed and there will be no seabed intervention in Turkey. Any dispersed sediments during pipe-laying will not travel far as the water currents at this depth are weak, causing the sediments to settle back onto the seabed. Further information is contained in Chapter 7 Physical and Geophysical Environment, and is also included in the EIA documentation.</p>
<p>Questions about impacts on the marine environment and marine species in the event of an unplanned gas leak or oil spill. A comment was made that the density of gas is lower than water, therefore, in the event of gas leak, surface marine life (e.g. plankton, fish) would be impacted.</p>	<p>The likelihood of such events occurring is remote. In the event that such incidents occur, the design controls and mitigation measures in place will ensure that the potential consequences would be limited, temporary and localised, therefore would not significantly impact any ecological species present in the water column. Further detail is provided in Chapter 13 Unplanned Events.</p>
<p>Health and Safety</p>	
<p>Concerns about potential Project-related gas leaks and accidents, and the risk this may pose to the coastal populations.</p> <p>Questions about how the Project would respond to unplanned events and what plans and procedures were in place to manage these situations.</p>	<p>Although the likelihood of occurrence is very small plans will be in place to avoid and respond to accidents and other unplanned events.</p> <p>No significant impacts on the Turkish coastline are expected due to the distance of the Project from the Turkish coastline (over 110 km). The risk of unplanned events, their consequences, and the mitigation and management plans the Project will have in place to avoid or respond to these events is discussed in Chapter 13 Unplanned Events.</p>

Continued...

Comments	Consideration and Response
<p>Questions about safety and security measures to minimise risk, and how the pipeline would be maintained over time.</p>	<p>South Stream Transport has committed to designing, building and operating the pipeline according to strict quality and safety standards. The pipeline will be built in accordance with pipeline industry standards, notably those of Det Norske Veritas (DNV), and European Standards (EN) for additional guidance where necessary.</p> <p>The pipelines will be continually monitored, in real time, from the landfall facilities in Russia and Bulgaria and at a control room in Amsterdam. There will also be regular visual inspections underwater using a Remotely Operated Vehicle (ROV). In the unlikely event of a leak, the pipeline would be shut down immediately. The ESIA includes an assessment of potential impacts associated with unplanned events such as a gas leak. Emergency Response Plans will also be implemented. Further information can be found in Chapter 5 Project Description and Chapter 13 Unplanned Events.</p>
<p>How much gas would escape in the event of a leak?</p>	<p>In certain regions in the Project Area, the operating pressure of the pipeline will be lower than the surrounding water pressure; as such, instead of gas release in the event of an accident, water will actually ingress into the pipeline. In sections where the gas pressure is higher than the ambient pressure, any released gas will be dispersed over a wide area by the time it reaches the surface where it will then be released into the atmosphere. Any escape of gas will be short-lived as the pipelines will be continuously monitored and will be shut down in the event of a rupture. No significant impact on health, safety, or the environment is expected. These issues are assessed in Chapter 13 Unplanned Events.</p>
<p>Concerns about the risk of vessel collisions and the dangers of a ship sinking and causing damage to the pipeline, as the Black Sea is a busy shipping route.</p>	<p>The baseline has identified that the Project Area is crossed by a number shipping routes. South Stream will work with the relevant maritime authorities to ensure other vessels are aware of the location of and restrictions around the construction spread. The collision risk analysis carried out for the Project has concluded that the probability of a collision during construction is extremely low. Chapter 13 Unplanned Events has also determined that the likelihood of a ship sinking and damaging the pipeline is remote.</p>

Continued...

Comments	Consideration and Response
<p>Questions relating to other safety components of the Project's design, such as whether there were valves or 'shutdown points' along the Turkish Sector.</p>	<p>There will be no valves in the Turkish sector; however the entire offshore section of the Pipeline can be shut off from closing valves at the landfalls (in Russia and Bulgaria) should an incident occur. Further details on the pipelines safety components can be found in Chapter 5 Project Description.</p>
<p>Fish will be attracted to the lights used by the pipe-laying vessel during the night. Large commercial fishing vessels may follow the fish to the source of light as it will increase their catch and so may surround the pipe-laying vessel. This may pose a health or safety risk, so fishing vessels should be informed about construction activities.</p>	<p>A proposed navigational safety exclusion zone of 2 km radius will be established around the pipe-laying vessel during construction. This will be communicated to all relevant maritime authorities, including the Turkish Coast Guard, and regular notifications on the pipe-lay vessels position will also be issued to the Turkish authorities. Consultations with fisheries in May 2014 indicated that these notifications procedures will be sufficient to ensure that no vessels attempt to breach the exclusion zone, as fishing vessels will be notified of restrictions by the Turkish Coast Guard.</p> <p>Prior to construction start in Turkish waters, the Project will engage with fisheries and vessel operators as appropriate to provide information directly in addition to the official measures to ensure that they are aware of Project activities and the navigational safety measures being taken.</p> <p>Further information on navigational safety measures is provided in Chapter 5 Project Description, and Chapter 13 Unplanned Events.</p>
<p><i>EIA/ESIA Processes and Reports</i></p>	
<p>Request that South Stream Transport share the data from the marine surveys that have been conducted along the Pipeline route.</p>	<p>South Stream Transport recognises the potential value of the marine survey data collected to date to Turkish stakeholders, in particular the scientific community. South Stream Transport has and will continue to share data from surveys with the competent authorities. A robust baseline is provided within the ESIA and EIA reports, which includes majority of the survey data available. Any recent studies and assessment undertaken for the Project during the preparation of the EIA and ESIA Reports have been provided in the appendices for further information.</p>

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Comments	Consideration and Response
<p>The Project was asked whether all the commitments in the draft EIA Report would be fulfilled by South Stream Transport.</p>	<p>The EIA and ESIA reports have been prepared according to national and international requirements respectively. These reports make various commitments to mitigate impacts. All commitments will be captured in the Project's Environmental and Social Management Plan. Monitoring will also be undertaken to verify the effectiveness of the mitigation measures and management plans in minimising Project impacts. Further information is provided in Chapter 16 Environmental and Social Management.</p>
<p>The methodology for baseline data collection and sampling is an important part of the impact assessments and analysis, especially for the area of biodiversity. Stakeholder input should be incorporated into this process.</p>	<p>The sampling methodology and criteria for assessing the baseline conditions within the Project Area have been provided in the technical chapters within this ESIA Report. Where relevant, stakeholder input has guided and been incorporated into baseline studies and impact assessments.</p> <p>With specific reference to biodiversity, the ESIA has identified the Black Sea as a critical habitat for certain seabirds and cetaceans, therefore there is an additional requirement for biodiversity monitoring/research. A Biodiversity Action Plan (BAP) will be developed which will seek to achieve net biodiversity gains by identifying additional opportunities to protect and conserve biodiversity. The implication of this for the Project's monitoring programme, particularly for birds and mammals, is that it must be appropriately designed to enhance scientific knowledge and thereby improve conservation measures for those species of conservation concern. The scope of such programmes will be developed in consultation with relevant parties to ensure the maximum benefit is delivered. Further information is contained in Chapter 8 Biological Environment and Chapter 16 Environmental and Social Management.</p>
<p><i>Stakeholder Engagement</i></p>	
<p>The Project should engage with stakeholders and relevant organisations, above and beyond the Turkish legal minimum requirements.</p>	<p>South Stream Transport has carried out stakeholder engagement in accordance national and international requirements. Engagement activities to date, and planned, go beyond the minimum legal requirements in Turkey. Stakeholder engagement activities are described in this chapter (Chapter 6 Stakeholder Engagement).</p>

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Comments	Consideration and Response
<p>The Project should continue to engage with fisheries so that they are aware of Project activities.</p>	<p>The Project has engaged with fisheries throughout the ESIA process to collect baseline information and feedback on potential Project impacts. Further engagement will occur around the disclosure of this ESIA Report to ensure that fisheries are made aware of the Project and have another opportunity to comment on the assessment of impacts and proposed mitigation and management measures that will be implemented.</p> <p>Beyond the ESIA process, the Project will engage with fishery groups through appropriate platforms to inform them of upcoming construction activities, as well as Project activities that have been completed, and provide advance warning of any anticipated changes. Fishery groups have suggested (May 2014) that such engagement could take place at the regular national symposiums on fishing, as well as via other means to be agreed directly with individual groups. Further information on planned future engagement activities is contained in the Stakeholder Engagement Plan for the Turkish Sector which can be found at www.south-stream-offshore.com.</p>
<p>Noise and Vibration</p>	
<p>Underwater noise and vibration from pipe-laying vessels could impact marine species. Noise, vibration and light from construction vessels may impact on the migration of anchovies.</p>	<p>In response to stakeholder concerns about the impact of underwater noise on marine species, South Stream Transport have commissioned a separate underwater noise modelling assessment (Appendix 8.1: Underwater Noise Assessment) to evaluate the potential level of underwater noise and vibration generated and whether this will impact marine species in the Black Sea. The assessment of impact and proposed mitigation measures relating to underwater noise and lighting impacts on marine species can be found in Chapter 8 Biological Environment.</p>

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Comments	Consideration and Response
<i>Social</i>	
It was noted that whilst the Project is unlikely to impact aquaculture as most spawning cages are located within 1 km from the Turkish coast, there is a possibility of impacts from construction support vessels passing nearby, or in the event of a gas leakage or oil spill.	No Turkish ports will be used so impacts on coastal aquaculture are not anticipated. The potential for spills to impact Turkish coastal waters is considered unlikely, and is discussed in Chapter 13 Unplanned Events and the oil spill modelling appendix (Appendix 13.1: Maritime Risk Assessment and Oil Spill Modelling).
Although fishing does not occur in the Project Area, Atlantic bonito has recently been caught close to the Project Area so it is possible fishing might take place in this area again in the future.	As most fishing activity occurs in Turkey's coastal waters, it is unlikely the Project will impact commercial fishing activity given the distance of the Project from the Turkish coast (minimum 110 km). This conclusion has been verified by the Project's engagement with local fisheries workers, fishing cooperatives and unions, fisheries experts and the General Directorate of Fisheries and Aquaculture under the Ministry of Food, Agriculture and Livestock. Further information can be found in Chapter 9 Socio-Economics .
The Project should consider potential impacts on subsea cables in the Turkish EEZ.	There are no known planned or existing subsea cables which would intersect with the Project Area. This has been verified with Turkish authorities.
What environmental and social investment programmes are being considered by the Project?	South Stream Transport has a Community Investment Programme (CIP) for the overall South Stream Offshore Pipeline. The initiatives of this programme will be developed with stakeholders and have not yet been defined.
Expectation that the Project will reduce unemployment in the local area.	<p>No facilities will be constructed by South Stream Transport in Turkey and no Turkish ports will be used.</p> <p>The majority of the offshore construction work force required will be highly skilled and specialised, and are anticipated to come from outside Turkey. Personnel employed during offshore construction will be managed by the offshore construction contractor.</p>

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Comments	Consideration and Response
Transboundary Impacts	
<p>A new branch of anchovy migration has developed in the last 3-4 years, starting from Bulgaria and migrating through the Western Black Sea coast into Turkey. This in-migration starts in February, and a lot of Turkish fishing vessels travel to the Western Black Sea region to catch anchovy during this period.</p> <p>If construction activities in Bulgaria disrupt the anchovy in-migration to Turkey, this impact on Turkish anchovy catches.</p>	<p>The fisheries study undertaken has assessed the impacts on fish and fisheries in Turkey, Bulgaria, and Russia, including potential transboundary impacts. The study has concluded that there are no significant impacts on anchovy migration from construction and operation of the South Stream Offshore Pipeline in the Bulgarian Sector, therefore no impacts on catch in the Turkish Sector are anticipated. The conclusions of the fisheries study were shared with the fisheries co-operatives in Trabzon and Samsun in May 2014. Both co-operatives stated that the conclusions concurred with their own views on the potential impacts of the Project on fishing.</p> <p>South Stream Transport will continue to engage with Turkish fisheries to ensure that the actual level of impact of Project activities is not greater than predicted in this ESIA Report. Further information on impacts on fisheries and proposed mitigation and management measures are included in Chapter 9 Socio-Economics and Appendix 9.1 Fishing Study.</p>

Complete.

6.6 Conclusions

Comments received from stakeholders to date, whether verbally or in writing (and irrespective of whether or not the primary purpose of the meeting was to seek comments on the scope of the ESIA Report), have been considered and addressed, where relevant, in this ESIA Report. Comments from stakeholders have informed the baseline studies, the identification and assessment of impacts, and the definition of mitigation and management measures.

Some comments raised by stakeholders highlighted the need for additional areas of study, which the Project has incorporated, demonstrating how stakeholders have informed the EIA and ESIA processes. For example, stakeholder concerns about the potential impact of the Project on fish (especially anchovy) and seasonal migration patterns resulted in additional fisheries studies. Appendix 9.1: Fisheries Study, reviewed the main commercially important fish species in Turkey, their migration routes, spawning grounds and feeding areas. An underwater noise assessment (Appendix 8.1) was also undertaken to support the assessment of impacts on fish species in the Black Sea.

The Project is committed to ongoing stakeholder engagement and welcomes feedback and comments from stakeholders over the life of the Project. The Stakeholder Engagement Plan will be periodically updated as the Project progresses through, and beyond, construction.

References

Number	Reference
Ref. 6.1	EIA Regulation (Official Gazette No. 26939 and date: 17 July 2008). www.cedgm.gov.tr/CED/Files/Mevzuat/ced_yonetmeligi_english.doc . Accessed on 7 October 2013.
Ref. 6.2	Council Directive 85/337/EEC of 27 June 1985 on the Assessment of the Effects of Certain Public and Private Projects on the Environment. http://ec.europa.eu/environment/eia/full-legal-text/85337.htm . Accessed on 7 October 2013.
Ref. 6.3	Council Directive 97/11/EC of 3 March 1997 amending Directive 85/337/EEC. http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31997L0011:en:NOT . Accessed on 7 October 2013.
Ref. 6.4	Organisation for Economic Co-operation and Development (OECD). Trade and Agricultural Directorate. Recommendations of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (TAD/ECG(2012)5). 28 June 2012. http://search.oecd.org/officialdocuments/displaydocumentpdf/?cote=tad/ecg(2012)5&docLanguage=en . Accessed on 7 October 2013.
Ref. 6.5	The Equator Principles Association. The Equator Principles. June 2006. http://www.equator-principles.com/index.php/ep3 . Accessed on 7 October 2013.
Ref. 6.6	The Equator Principles Association. Draft of Updated Equator Principles (EP III). 13 August 2012. www.equator-principles.com/resources/EPIII_PACKAGE.pdf . Accessed on 7 October 2013.
Ref. 6.7	Japan Bank for International Cooperation (JBIC). Environmental and Social Considerations Required for Funded Projects. April 2012. Available from: http://www.jbic.go.jp/en/about/environment/guideline/business/pdf/pdf_01.pdf . Accessed on 5 November 2013
Ref. 6.8	International Finance Corporation (IFC). Performance Standards on Environmental and Social Sustainability. January 2012. http://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/IFC+Sustainability/Sustainability+Framework/Sustainability+Framework+-+2012/Performance+Standards+and+Guidance+Notes+2012/ . Accessed on 7 October 2013.
Ref. 6.9	Organisation for Economic Co-operation and Development (OECD). List of OECD Member Countries – Ratification of the Convention on the OECD. 2013. http://www.oecd.org/general/listofocdmembercountries-ratificationoftheconventionontheoecd.htm . Accessed on 7 October 2013.

Number	Reference
Ref. 6.10	Convention on Access to Information, to Public Participation in the Decision Making Process and the Administration of Justice concerning Environmental Matters (Aarhus Convention). 1998. http://www.unece.org/fileadmin/DAM/env/pp/documents/cep43e.pdf . Accessed on 7 October 2013.
Ref. 6.11	United Nations Convention on EIA in a Transboundary Context. Espoo. 25 February 1991. Available from: http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&frm=1&source=web&cd=3&ved=0CDcQFjAC&url=http%3A%2F%2Fwww.unece.org%2Fenv%2Feia%2Fdocuments%2Flegal%2Fconventiontextenglish.pdf&ei=7Tx5UoycC6XK0QW4oICYBA&usg=AFQjCNGreOqUEp5a6V6PrIz48UXvfQ_DjA . Accessed on 5 November 2013.
Ref. 6.12	Ministry of Culture and Tourism. The Economy and Trade in Trabzon. 2005. http://www.kultur.gov.tr/EN,33572/the-economy-and-trade-in-trabzon.html . Accessed on 8 October 2013.

