

**Appendix A3: ESIA Information Package,
Example Project Leaflet and
Project Posters (English)**

BAKU-TBILISI-CEYHAN PIPELINE PROJECT

Turkey Section

Environmental and Social Impact Assessment (ESIA)

Information Package

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1 INTRODUCTION

1.1 THE PROJECT

The Baku-Tbilisi-Ceyhan Crude Oil Pipeline (BTC Pipeline) Project aims to transport Caspian crude oil via the Azerbaijan Republic, Georgia and the Republic of Turkey to the Mediterranean Sea. Crude oil will be supplied to the international markets via a marine terminal to be constructed on the Gulf of Iskenderun in Ceyhan. The BTC Pipeline will be capable of transporting up to 50 million metric tonnes per year / 1 million barrels per day of crude oil. The entire pipeline route is shown on Figure 1.1.

1.2 THE ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

In line with international best practice and Turkish standards and guidelines, a full Environmental and Social Impact Assessment (EIA) will be undertaken for the BTC Pipeline Project. The aim of an EIA process is to ensure that all potential environmental and social impacts of a project are fully investigated and where necessary, mitigated.

Essential elements of an EIA are:

- Identification and documentation of existing environmental and social baseline conditions;
- Identification and assessment of potential impacts that may arise during construction and operation of the pipeline and the marine terminal;
- Consultation and dialogue with stakeholders (local, national and international) to ensure that all issues and concerns are identified and addressed;
- Development of management measures to mitigate potential impacts and enhance positive impacts associated with the development; and
- Disclosure of the EIA to ensure that stakeholders have a full understanding of the environmental and social impacts of the project, and associated mitigation measures

1.3 THIS DOCUMENT

This ESIA Information Package deals solely with those parts of the BTC Pipeline Project that are within the Republic of Turkey. It is intended to provide initial information about the project to parties interested in the Turkish section of the project.

This ESIA Information Package is structured into the following sections:

- Section 1: Introduction;
- Section 2: The BTC Pipeline Project. A description of the project, the benefits of the project and the organisations that are undertaking project description and operation;
- Section 3: Regulatory Context. An overview of the regulations and standards that will govern the project and in particular the completion of the EIA;
- Section 4: The Existing Environment. An overview of the environment through which the pipeline will pass;

- Section 5: Potential Impacts and Mitigation; and
- Section 6: Public Consultation and Disclosure.

1.4 PROJECT TIMETABLE

The key milestones for the project are outlined below:

- Basic Engineering: October 2000 – May 2001;
- Detailed Engineering: June 2001 – June 2002;
- EIA: July 2001 – April 2002;
- Construction: June 2002 for 32 months; and
- Operation: 2005.

1.5 FURTHER INFORMATION

The following material will be developed as the EIA progresses and made available to interested parties during the consultation process:

- Project Summary document, describing the project's key features;
- Leaflet describing the proposed project, for wider dissemination;
- ESIA Information Package (this document);
- Public Consultation and Disclosure Plan (PCDP), outlining the approach for stakeholder consultation;
- Draft EIA including an executive summary; and
- Final EIA including an executive summary.

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Figure 1.1 BTC Pipeline Project Route

2 THE BTC PIPELINE PROJECT

2.1 OVERVIEW

The Baku-Tbilisi-Ceyhan Crude Oil Pipeline (BTC Pipeline) Project will comprise four key stages:

- Basic Engineering (BE);
- Detailed Engineering (DE);
- Pipeline and Marine Terminal Construction; and
- Operation.

The routing of the pipeline and main project components as determined during BE in Turkey is shown on Figure 2.1. The proposed location for the marine terminal at Ceyhan is shown on Figure 2.2. The alignment of the BTC Pipeline route will be further refined during the ongoing DE phase of the project.

The Turkish section of the BTC Pipeline is routed between the Georgia-Turkey border in the Posof District (Turkgozu border gate) and Ceyhan, with a total length of about 1,070km. From the border, the pipeline will cross the provinces of Ardahan, Kars, Erzurum, Erzincan, Gumushane, Sivas, Kayseri, Kahramanmaras, Osmaniye and Adana, to the marine terminal, which is to be constructed at Ceyhan.

Land acquisition and pipeline construction is planned to begin in June 2002, lasting for 32 months. The start date for operation of the pipeline is 2005.

2.2 BACKGROUND AND PROJECT ALTERNATIVES

Determination of the proposed pipeline route for the export of Caspian oil to world markets was a time-consuming and complex task. In addition to the traditional assessment criteria for routing, other significant factors have had to be assessed, including security issues, political considerations and the environmental and social issues associated with the transport of the oil.

During 1997, feasibility studies undertaken by World Bank and BOTAŞ considered seven alternative route corridors for the pipeline from Baku to Ceyhan. As part of the feasibility study, issues were identified which might influence the pipeline route selection.

Primary importance was placed on the selection of a route that could be constructed and operated with a minimum risk for potential pipeline failure and one that minimized potential environmental and social impacts. This was followed by a more detailed determination and evaluation of various constraints that had the potential to affect the construction and operation of the pipeline, including environmental issues, social issues and ease of constructability. The outcome of this assessment was the definition of a 10km wide corridor that was presented to the governments of Azerbaijan, Georgia and Turkey in December 2000. From this 10km wide corridor a 500m pipeline corridor has been defined. During the course of the design process, the optimum pipeline route will be identified from within this corridor.

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Extensive studies have been undertaken to ensure that the pipeline route both minimizes environmental and social impacts and avoids geological features and processes (known as geohazards) that may threaten the integrity of the pipeline. Where potential geohazards have to be crossed, such as faults, specific design measures are undertaken to minimize the risk of pipeline failure.

Where possible the route follows existing roads, pipelines or other already impacted corridors. The pipeline also avoids all areas classified by the international union for the conservation of nature ¹ (IUCN). Furthermore, no requirement to resettle individuals is envisaged

⁽¹⁾ The IUCN is an umbrella environmental organisation representing governments and environmental NGOs.

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FIGURE 2.1

FIGURE 2.2: Proposed location of the marine terminal facilities at Ceyhan

2.3 PROJECT BENEFITS

The BTC Pipeline Project will enable crude oil transport to international markets in a more economic, safe and environmentally friendly way. Key areas of improvement will be the following:

- Crude oil will be transported to refineries in a much shorter period of time, therefore saving a considerable amount of money in transportation;
- BTC Pipeline will not increase the volume of oil passing through the Turkish Straits, thereby reducing the associated environmental risks; and
- Routing the BTC Pipeline through Turkey will strengthen Turkey's role in providing an energy corridor between the Caspian region and international markets in Europe and beyond. This will deliver economic benefits to Turkey, specifically from the pipeline transit fee and the fixed tariff for oil. Limited employment opportunities and economic benefits will also be generated at the local level during the construction and operation phases.

2.4 THE PROJECT PARTICIPANTS

The BTC Pipeline Project is being undertaken by a group of petroleum companies, including SOCAR, BP, Delta Hes, TPAO, Itochu, Unocal and Statoil. For the purposes of the BTC Pipeline Project, this group of companies is referred to as the Project Participants. As shown in Figure 2.3 below, BP is coordinating project development at this stage. BOTAS, a state owned Turkish petroleum pipeline company, are the Turnkey Contractor for design, engineering and construction of the pipeline and marine terminal.

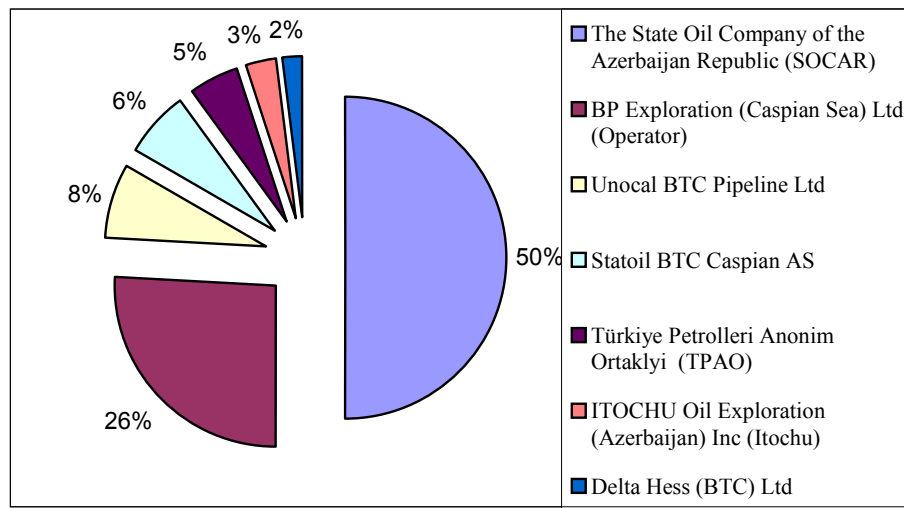


Figure 2.3: Shareholding of Project Participants

The BTC Pipeline Project will cost approximately US\$2.9 billion to build across the Azerbaijan Republic, Georgia and the Republic of Turkey. The Turkish section of the BTC Pipeline Project will cost US\$1.4 billion. The Government of Turkey has provided a guarantee for a limited amount of any cost overrun should this occur.

The Project Participants are financing the initial stages of the project. Discussions with these and other potential stakeholders are ongoing to fund the project beyond the Detailed Engineering phase.

2.5 PROJECT COMPONENTS

2.5.1 Pipeline and Associated Facilities

The pipeline will be buried along the entire route and will require a corridor of 22m to be cleared during construction. Of this eight meters will be permanently acquired and 14m will be temporarily acquired (for construction purposes). Some additional land will be required during construction for camps (for workers) and storage areas.

The design and operation of the pipeline will be to the highest international standards. Factors that will optimise the reliability of the pipeline are the following:

- The pipeline will comprise continuously welded steel;
- Once in operation, the pipeline will be properly maintained. Regular inspection of the pipeline - both inside and outside - will identify any deterioration in the condition of the pipeline;
- The pipeline will be equipped with a 'Leak Detection System' to respond immediately to operational problems;
- Block valves located along the pipeline will be able to be operated manually and remotely in order to isolate sections of the pipeline. They will normally be placed at intervals of approximately 30km and either side of sensitive areas such as river and fault crossings, areas of dense population, areas rich in endemic species etc; and
- The pipeline will be able to be controlled centrally via a Supervisory Control and Data Acquisition (SCADA) system.

Specific details such as pipe diameter, coating systems, wall thickness, cathodic protection, burial depth and the exact number and location of the pump stations will be determined during the Detailed Engineering phase of the project. Special designs will be implemented at river and fault crossings and in areas of potential land instability. The pipeline will be operated continuously and will only be out of service during maintenance.

2.5.2 Above Ground Installations (AGIs)

Some additional land will be required for the following permanent Above Ground Installations (AGIs):

- Intermediate pump stations to ensure the flow of oil through the pipeline. The first pump station near the Georgian border will include custody transfer and metering facilities to record the flow rate of the crude oil through the pipeline. The second pump station is likely to be located in the vicinity of Baskoy sub-district;
- Pressure reduction station at Ceyhan marine terminal;
- Scraper facilities for monitoring and maintaining the internal integrity of the pipeline; and
- Block valves.

2.5.3 Ceyhan Marine Terminal

A new tank farm and loading jetty complex will be constructed at Ceyhan and will be used to store the transported crude oil prior to loading on to marine tankers. The Ceyhan storage terminal will be built on land owned by BOTAŞ, immediately adjacent to the existing facility. A pipeline will gravity feed the crude oil via the new jetty located some 2,200m south of the existing jetty to waiting tankers. The new terminal will operate as a stand-alone facility.

The new Ceyhan terminal will comprise the following facilities:

- Up to seven storage tanks with floating roofs for the storage of transported crude oil;
- A jetty which will be 2,562m long (approximately 500m longer than the existing jetty);
- Pipeline loading facilities (capacity of 60,000 barrels of crude oil / hour);
- Marine loading facilities designed for ships with a deadweight tonnage (DWT) of between 80,000 and 300,000 tonnes;
- Pipeline monitoring and control system; a d
- Metering facilities.

The Host Government Agreement (HGA) stipulates that Segregated Ballast Tankers (SBT) will be used in the marine loading process therefore there will be no need for ballast water reception facilities.

3 REGULATORY CONTEXT

3.1 REGULATORY FRAMEWORK

Two key agreements have been signed between the governments of Turkey, Azerbaijan and Georgia and the project investors.

- The “Inter-Government Agreement” (IGA) was published in the Official Gazette on 10th September 2000 (number 24166). This agreement supersedes and nullifies any prior protocol, agreement or treaty between or among any of the three states with respect to the transportation of crude oil through the BTC Pipeline.
- The “Host-Government Agreement” (HGA) was published in the Official Gazette on 10th September 2000 (number 24166). This agreement supersedes all standards and practices of Turkey regarding crude oil transportation within the context of BTC Pipeline Project. In particular the agreement supersedes the Turkish “Environmental Impact Assessment Regulation”, dated 27th June 1997.

The IGA and HGA therefore provide the regulatory framework for the BTC Pipeline Project. The agreements define the capital and resources that each signatory will provide to the project, the timetable by which it will be developed in the three countries and the standards that it will meet.

BOTAŞ, as the Turnkey Contractor for design, engineering and construction of the pipeline and marine terminal are required to meet minimum standards and requirements (such as scope, programme and price) as set out in the Lump Sum Turnkey Agreement (LSTK) between the BTC Company and BOTAŞ.

3.2 REQUIREMENTS FOR THE ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

The HGA establishes that the Environmental and Social Impact Assessment (EIA) will be undertaken in accordance with the following requirements:

- Turkish regulations, standards and guidelines;
- Relevant international protocols and agreements such as the conventions of the International Labour Organisation (ILO) that have been ratified by Turkey;
- Requirements of International Financial Institutions such as the World Bank; and
- BOTAŞ environmental policy.

Each of these requirements are summarised below. Details of their requirements will be provided in the full EIA report.

3.3 TURKISH REGULATIONS, STANDARDS AND GUIDELINES

The principle legislation is the Environment Law of August 1983. Article 10 of the "Environment Law" requires an EIA report for investment projects, which have the potential to create adverse environmental effects. The types of projects for which an EIA report will be required and the specific topics that should be covered for different cases are described in the "EIA Regulation" issued by the MoE (revised 23rd June 1997). This article is in conformity with the pertinent international legislation and guidelines, such as those of the World Bank (1991 and 1996) as well as those of European Commission (1985 and 1996). The preparation of an EIA report is mandatory for the proposed BTC Pipeline Project since the diameter of the pipeline is greater than the regulation threshold.

All regulations associated with Turkish Environment Law will be complied with, unless they are superceded by the "Host-Government Agreement".

3.4 INTERNATIONAL PROTOCOLS AND CONVENTIONS

The Turkish Government has signed and has agreed to a number of international agreements and conventions relating to environmental protection. The EIA process will consider the impacts of the BTC Pipeline Project in the context of these.

3.5 REQUIREMENTS OF INTERNATIONAL INSTITUTIONS

The HGA states that "Creation of the Environmental Strategy Product (which includes Environmental and Social Impact Assessments) and implementation of the environmental strategy reflected therein shall be in accordance with the standards and practices generally prevailing in the international petroleum pipeline industry".

The International Agencies, such as the World Bank and the European Union, have guidance for EIAs. Relevant guidance includes:

- World Bank Operational Policy 4.01; and
- EC Directive 85/337/EEC.

The EIA that will be undertaken for the BTC Pipeline will comply with the guidance for a full EIA.

3.6 BOTAŞ ENVIRONMENTAL POLICY

Protection of the environment is a high priority for the BTC Pipeline Project. As a result, Environmental Management is an integral part of the project Quality Management System, thereby ensuring that environmental requirements are identified, planned, achieved, maintained, documented and, where possible, improved.

BOTAŞ BTC Pipeline Project Directorate recognises that it has a responsibility to ensure that through the implementation of good environmental management practices, all the potential adverse impacts on the environment associated with the project are either avoided or appropriately mitigated.

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Accordingly, all work will be conducted in compliance with applicable environmental laws and regulations as well as the standards and best-practices generally prevailing in the international petroleum industry in a manner which supports the protection, preservation and enhancement of the environment. To achieve this aim, the BOTAŞ BTC Project Directorate has developed and established a set of policies to guide the execution of all work performed.

4 THE EXISTING ENVIRONMENT

4.1 BASELINE STUDIES

Detailed information on baseline conditions is required for a sound identification, prediction, evaluation and mitigation of the potential effects related to the BTC Project. The main studies that contribute to the baseline environmental data include:

- World Bank Feasibility Study Report (1997 / 1998);
- Desk top studies collating existing data on the environmental conditions along the proposed corridor compiled from literature reviews relating to protected areas, archaeology and cultural monuments, flora, fauna, air quality, geology, and soils;
- Data from State Authorities;
- Maps and aerial photos; and
- Project-derived field data that were generated during the Pre-Work Program undertaken in September 2000 and other field investigations carried out during BE phase.

Field surveys and other environmental studies that have been or are currently being undertaken include:

- Routing surveys;
- Terrain evaluation: geohazards survey (including landslides, active faults, liquefaction areas and karstic areas);
- Resistivity;
- Risk assessment;
- Preliminary Oil Spill Response Plan;
- Terrain protection and restoration;
- Marine ecology (winter and summer);
- Sea turtle survey;
- Bird survey;
- Archaeological survey;
- Ecological survey (Phases 1 and 2);
- Chemical analyses and soil sampling, Ceyhan Marine Terminal tank farm;
- Water quality survey; and
- Oceanographical studies

Much of the information collected from the above sources has been integrated within a Geographical Information System (GIS). The principal data themes included in the GIS database can be classified as follows:

- Physical data (i.e., topography, surface geology, soil types, hydrology and hydrogeology);
- Biological data (i.e., vegetation, designated areas such as national parks, nature reserves, restricted access areas, and ecologically important areas);

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- Socio-economic data (i.e., land use, roads, power lines, dams and settlements); and
- Archaeological sites and culturally sensitive areas (i.e., cemeteries, historical monuments and previously unrecorded sites).

5 POTENTIAL IMPACTS AND MITIGATION

5.1 INTRODUCTION

This section identifies and provides a review of the BTC Pipeline Project's potential impacts. These impacts will be investigated as part of the EIA process.

5.2 POTENTIAL IMPACTS

In terms of potential impacts (positive and negative), the most important phases of the BTC Pipeline Project are construction, operation and accidental impacts. Table 5.1 presents key issues associated with the proposed project and gives examples of potential impacts.

5.3 MITIGATION

Mitigation is regarded as a critical part of the EIA process. It has the primary aims of ensuring that potential negative environmental and social impacts or risks associated with the project are managed, reduced or prevented wherever possible. By investing in appropriate mitigation measures, issues such as route and site selection of facilities, control of construction activities and compensation for land can be identified early and adequately mitigated.

In addition to ensuring that impacts are adequately mitigated, it will be important to design a monitoring program to ensure compliance with relevant environmental standards and to assess the performance of the mitigation measures.

Table 5.1 Key Issues for the EIA and Potential Impacts

KEY ISSUES	EXAMPLE OF POTENTIAL IMPACTS
Construction	
Air emissions	Local dust nuisance, impacts on ecological habitats, and emissions from construction vehicles and marine traffic.
Archaeology	Demolition of sites or deposits as a result of ground disturbance and excavation.
Ecosystems	Disturbance, sedimentation and other impacts on fish, marine mammals, birds, benthic environment. During pipeline construction, temporary loss and fragmentation of habitats and damage to adjacent habitats and species.
Landscape resource	Stripping and temporary storage of topsoil along the working width, interruption of agricultural use of the working width. Loss of integrity to some long-established landscape features.
Visual impact	Removal of trees and other permanent vegetation cover, vehicle movements and construction lay-down areas, stripping and temporary storage of soils along the working width.
Noise and vibration	Disturbance to nearby communities and marine and terrestrial animals and birds.

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KEY ISSUES	EXAMPLE OF POTENTIAL IMPACTS
Socio-economic	<p>Temporary employment opportunities. Locally supplied services and materials.</p> <p>Temporary and permanent land take along the pipeline corridor (22m and 8m respectively).</p> <p>Impacts associated with the construction workforce, including increased market for local goods, potential disruption to local communities, health and safety issues.</p> <p>Disruption to commercial and artisanal fishing and navigation at the marine terminal.</p> <p>Increased exclusion zone in the vicinity of the marine terminal and jetty development.</p>
Soils	Alteration of soil structure during top soil separation/ storage. Slope instability and erosion. Contamination of soils.
Transportation	<p>Increase of traffic loads.</p> <p>Increased marine traffic in vicinity of the marine terminal and jetty development.</p>
Water	<p>Disturbance of water quality during construction (site drainage, dredging, compaction, dewatering etc.), support vessels at the marine terminal.</p> <p>Changes in the physical characteristics of, drainage patterns of and re-suspension of sediments in watercourses and wetlands. Increased demand on resources.</p>
Operation	
Air emissions	Hydrocarbon emissions from storage tanks and tankers at the marine terminal.
Archaeology	None are anticipated for this phase of the project.
Ecosystems	At the marine terminal, potential disturbance, sedimentation and other impacts on fish, marine mammals, birds, benthic environment.
Landscape and visual impacts	Storage tank farm, jetty and tankers at the marine terminal.
Noise and vibration	Disturbance to nearby communities and marine and terrestrial animals and birds.
Socio-economic	<p>Land occupation within the 8m right of access area.</p> <p>Indirect employment opportunities.</p> <p>Disruption to commercial and artisanal fishing activities and navigation at the marine terminal.</p> <p>Increased exclusion zone in the vicinity of the marine terminal and jetty.</p>
Soils	Potential erosion.
Transportation	<p>Increase of traffic loads.</p> <p>Increased tanker traffic in vicinity of the marine terminal and jetty.</p>

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KEY ISSUES	EXAMPLE OF POTENTIAL IMPACTS
Water	Impacts from sanitary effluents, cooling activities and support vessel discharges at the marine terminal.
Accidental	
Ecosystems	Contamination due to spillage. Aquatic and terrestrial pollution including threats to marine mammals, sea shore birds from chronic and catastrophic oil spills.
Soil quality	Contamination due to spillage.
Water pollution	Contamination due to spillage.
Socio economic	Impact on economic livelihoods of fishermen due to spillage.

6 PUBLIC CONSULTATION AND DISCLOSURE

6.1 PUBLIC CONSULTATION AND DISCLOSURE PLAN (PCDP)

A Public Consultation and Disclosure Plan (PCDP), to World Bank standards, has been prepared for the Turkey BTC Pipeline Project EIA. The PCDP outlines a plan for public consultation and information disclosure that starts at the project planning stage, and continues throughout construction, operation and decommissioning of the BTC Pipeline.

Given the size, nature and complexity of the BTC Pipeline Project and associated issues, BTC Co and BOTAŞ are committed to undertaking public consultation on five levels:

- International,
- National,
- Provincial
- District, and
- Settlement level.

This includes government authorities, national and local NGOs, media and other interest groups, 10 provincial governors, 34 sub-governors and a large proportion of Muhtars and settlements within the 4km pipeline corridor and in the vicinity of the marine terminal. In order to make this commitment a reality, the PCDP outlines the actual plan for consultation. Key issues that are covered in the PCDP include:

- An outline of roles and responsibilities;
- A brief description of the project;
- A summary of the most important international standards on public consultation;
- A summary of national government regulations on public consultation as part of EIA, land acquisition or the like;
- A list of stakeholders involved in the consultation process;
- A summary of the consultation and disclosure activities to date;
- A plan for consultation at the national, regional and local level during the EIA process, and for continuing consultation during construction and operation of the pipeline; and
- A timetable for consultation and disclosure activities.

The PCDP is a 'living' document and may be revised over time to reflect information gained during the consultation process. Although consultation will be on-going throughout the EIA process, there are three key stages during which public consultation will be facilitated. These are:

- Phase 1: Information distribution;
- Phase 2: Impact identification and mitigation; and
- Phase 3: Disclosure of the draft EIA.

6.2 PHASE 1: INFORMATION DISTRIBUTION

The key objective of Phase 1 consultation was to distribute project information to all stakeholders. For this purpose, the EIA Information Package (this document) and leaflet were compiled and distributed. The EIA Information Package has been prepared for distribution to authorities (national to village level), NGOs, media and other interest groups. The leaflet, although available to all stakeholders, is intended for wide distribution at the village level.

In order to maximise involvement of village level stakeholders during detailed consultation (Phase 2), the Phase 2 meetings with provincial, district and village level authorities (Muhtars) were brought forward to coincide with Phase 1 activities. This allowed for distribution of project information to the Muhtars (for distribution at the village level) prior to village consultation, and also for discussions with local authorities regarding the proposed village level consultation process. These discussions were aimed at refining the consultation process to ensure that it is appropriate to the local context. These Phase 2 meetings were undertaken during the month of August 2001.

6.3 PHASE 2: IMPACT IDENTIFICATION AND MITIGATION

Following the combined Phase 1 and Phase 2 activities during August 2001, the remainder of Phase 2 commenced in early September 2001, extending over a total period of 2 months. Specifically this phase includes:

- Meetings with national NGOs and national media;
- Meetings with local NGOs, academics, local media and other local interest groups;
- Community meetings along the length of the pipeline;
- Consultation specific to the Ceyhan Marine Terminal and jetty, including with local authorities, residents and fishing industry in the vicinity; and
- Issues management / mitigation workshops with local specialists.

The overall objectives of the second phase of consultation is to ensure that all stakeholders are given the opportunity to raise issues of concern relating to the proposed pipeline and marine terminal, as well as discuss potential mitigation measures which will help decrease the negative impacts and optimise the benefits associated with the development. The information gathered during the first phase of consultation assists in refining the terms of reference for the specialist investigations and allows for the early identification of issues for input into project design.

6.4 PHASE 3: DISCLOSURE OF THE DRAFT EIA

The third phase of public consultation will commence after publication of the draft EIA Report at the beginning of February 2002. A non-technical summary of the draft EIA and other materials will be distributed to all stakeholders prior to actual consultation. Copies of the full draft EIA will also be made available. The PCDP (revised and updated where necessary) will be issued as part of the draft EIA. The draft EIA will be publicly disclosed for at least 60 days. The objective of this phase of consultation is to provide all stakeholders with the opportunity to comment on the contents of the draft EIA prior to its finalisation and submission to the Ministry of Environment and International Finance Corporation at the beginning April 2002.

6.5 PHASE 4: DURING CONSTRUCTION AND OPERATION

The revised PCDDP will serve as a guide for on-going public consultation during project construction and operation. The objective of the measures that will be devised will be to keep those affected by the project informed of on-going changes in the project activities, manage issues and grievances as they arise and monitor the effectiveness of environmental and social impact mitigation and compensation.

In accordance with best practice, independent environmental audits of project facilities and procedures will be commissioned. The audits will be designed to check compliance with all project regulatory requirements and with industry best practice.

As part of the environmental management of the project, an Environmental Management Plan (EMP) will be developed. This plan will set out the requirements for monitoring the environment potentially affected by the pipeline and marine terminal construction and operation both internally and by independent bodies.

EXAMPLE PROJECT LEAFLET (ENGLISH)

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