

Appendix A1 - Public Consultation and Disclosure Plan (PCDP)

1 INTRODUCTION

1.1 OVERVIEW

The Azerbaijan Republic, Georgia and Republic of Turkey have come to an agreement to implement the Baku-Tbilisi-Ceyhan Crude Oil Pipeline (BTC Pipeline) Project. This dedicated crude oil pipeline system will transport crude oil extracted from the Caspian, from Sangachal in Azerbaijan (on the west coast of Caspian Sea), to Ceyhan, Turkey (on the north-eastern part of the Mediterranean Sea), with marine access to international markets.

Having completed the Basic Engineering (BE) Phase, the BTC Pipeline Project has reached the Detailed Engineering (DE) Phase. One of the main objectives of this phase is to undertake a full environmental and social impact assessment (EIA) in accordance with national and international standards and practices. Within this context, extensive public consultation will be carried out according to World Bank standards.

1.2 THIS DOCUMENT

This document is a Public Consultation and Disclosure Plan (PCDP) for the EIA of the Turkish section of the BTC Pipeline. It presents a plan for consultation designed to: provide timely information about the project and its potential impacts to project affected people¹ and other stakeholders²; provide opportunities to those groups to voice their opinions and concerns in a way that is most appropriate to their circumstances; and provide an opportunity for feedback to, and discussion with, those settlements concerning measures proposed. The activity is being managed by BP Exploration Caspian Sea Ltd (BP) and BOTAŞ, on behalf of the BTC Company (BTC Co.), the group of petroleum companies involved in the project.

The PCDP aims to:

- Identify key stakeholders and ensure there are adequate mechanisms for stakeholder feedback and information sharing;
- Provide an outline for consultation at the local, national and international levels, starting at the project planning stage, and continuing throughout construction, operation and decommissioning of the pipeline and marine terminal;
- Ensure issues raised by key stakeholders are addressed in the EIA report as well as in project decision-making and design phase;
- Identify the level of resources required to implement the plan, and procedures to monitor implementation; and
- Outline a grievance mechanism for local stakeholders.

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1. Project Affected People are defined for the purposes of this project as those living within a 2km band either side of the pipeline corridor, and within 5km of a pump or pressure reduction station, a primary construction camp or pipe yard or the marine terminal facility, who may be affected by the activities of land acquisition, construction, operation and decommissioning.
 2. For the purposes of this project, Stakeholders are defined as any persons or parties with an interest in the project. This include the following: 'Local' refers generally to the project affected settlements and other local interested parties including local government; 'National' refers to interested parties within Turkey who are not 'local' including regional and national NGOs, academics, Government, media etc; International includes international NGOs, World Bank and other IFIs, UN Agencies, etc.

This PCDP is a document to reflect information gained through consultation undertaken throughout pre-construction up April 2003. The project is committed to continue recording consultation activities during construction, operation and decommissioning. This document is for publication in May 2003 and reflects information gained from the public disclosure of the draft EIA Report between July and August 2002, comments received from the Lender Group International Finance Institutions and other stakeholders from September 2002 to April 2003.

This PCDP contains the following sections:

Section 1:	Introduction
Section 2:	Project Description
Section 3:	Regulatory Context for Public Consultation
Section 4:	Consultation Plan for Pre-construction
Section 5:	Phase 6: Public Disclosure of the Resettlement Action Plan (RAP)
Section 6:	Phase 7: Consultation Plan during Construction, Operation and Decommissioning
Section 7:	A Summary Timetable of Consultation and Disclosure Activities
Section 8:	Resourcing Issues Relating to the Implementation of the Plan
Section 9:	Grievance Mechanism

Appendices:

Appendix A1	Public Consultation and Disclosure Plan (PCDP)
Appendix A2	PCDP Material: Stakeholder Lists
Appendix A3	PCDP Material: ESIA Information Package, Project Leaflet and Sample Posters
Appendix A4	PCDP Material: Public Consultation Questionnaires
Appendix A5	Baseline Data Collection for Social Aspects
Appendix A6	PCDP Material: Exhibition Panels and Advertisements
Appendix A7	Community Pamphlet
Appendix A8	Consultation Results
Appendix A9	Update to Public Consultation and Disclosure Plan
Appendix A10	Guide to Land Acquisition and Compensation (GLAC)

2 PROJECT DESCRIPTION

2.1 ROLES AND RESPONSIBILITIES

The BTC Pipeline Project is being undertaken by a group of petroleum companies, including SOCAR, BP, Delta-Hess, TPAO, Itochu, Unocal, ENI and Statoil. For the purposes of this project, this group of companies is referred to as BTC Co. Within the BTC Co., BP is responsible for project development. BOTAS, a state-owned Turkish petroleum pipeline company, are the Turnkey Contractor for construction of the pipeline and marine terminal. The definition of the Turnkey Agreement includes design, commissioning etc.

BTC Co., in partnership with BOTAS, take overall responsibility for consultation with stakeholders in relation to the Turkish section of the BTC Pipeline Project, and participate in the design of all consultation activities. Both BTC Co. and BOTAS/Designated State Authority (DSA), actively participate in all NGO and authority and community meetings, where possible. DSA partner directly with the project as the body responsible for the implementation of the Resettlement Action Plan (RAP).

BTC Co. and BOTAS have contracted both national and international consultants to carry out the environmental and social impact assessment studies. Hence, the consultants are supporting them in carrying out consultation throughout the development of the EIA.

The international consultants for the EIA are Environmental Resources Management (ERM). ERM's role is to assist in the coordination of the environmental and social aspects (SIA) of the impact assessment and consultation process, and to ensure that they meet the required international standards. The national consultants, KORA and Veri Arastirma, have been integrally involved in the SIA and coordinating and facilitating settlement meetings close to the pipeline route and marine terminal development. ENVY, as the national environmental impact assessment (EIA) consultants, is providing specialist environmental input at meetings with NGOs and government authorities and has been involved in conducting many of the environmental baseline studies.

2.2 PROJECT COMPONENTS

The BTC Pipeline Project aims to transport Caspian crude oil via the Azerbaijan Republic, Georgia and the Republic of Turkey to the Mediterranean Sea. The BTC Pipeline will be capable of transporting up to 50 million metric tonnes per year of crude oil/approximately one million barrels per day.

The Turkish section of the BTC Pipeline will start from the Georgia-Turkey border in the Posof district of Ardahan province and finish at Ceyhan in Adana province, with a total distance of 1,076km. It will cross the ten provinces of Ardahan, Kars, Erzurum, Erzincan, Gumushane, Sivas, Kayseri, Kahramanmaras, Osmaniye and Adana. The entire pipeline route is shown in Figure A1.1.

Crude oil will be supplied to the international markets via a marine terminal to be constructed in the Gulf of Iskenderun in Ceyhan. Crude oil will be stored prior to loading on to tankers. The BTC Marine Terminal will be built on an existing BOTAS site at Ceyhan, adjacent to existing BOTAS storage and marine terminal facilities.

In addition to the pipeline and marine terminal, the following temporary and permanent facilities will be considered in the EIA and supporting consultation process:

- Permanent facilities and other Above Ground Installations (e.g., pump stations, a pressure reduction station, block valve stations, scraper facilities, permanent access roads);
- Temporary facilities (e.g., temporary access roads and construction facilities such as material yards, fuel depots and construction camps); and
- Effects on existing infrastructure and resources (e.g., use of existing roads, extraction of construction materials, use of water and the disposal of waste).

2.3 PROJECT TIMETABLE

During the Basic Engineering (BE) Phase potential route options were analysed. Consideration of financial, security, technical, environmental and social factors led eventually to the identification of a preferred 500m pipeline corridor.

The next phase, Detailed Engineering (DE), is now underway and is due for completion August - September 2002. Environmental and social impacts have been assessed and fed into the DE process through the EIA. The draft EIA was released to the public at the end of June 2002, with comments solicited from the public for a period of 60 days prior to finalisation of the document. A summary of disclosure related activities is provided in Chapter 4 of this document.



Figure A1.1 BTC Pipeline Route

3 REGULATORY CONTEXT FOR PUBLIC CONSULTATION

3.1 INTRODUCTION

Public consultation activities identified in this PCDP will conform to:

- Turkish regulations;
- Guidelines established by international organisations, specifically the World Bank, International Finance Corporation (IFC), and the European Bank for Reconstruction and Development (EBRD);
- European Commission requirements (though not required by law);
- Relevant International Conventions for Public Participation; and
- Internal standards of the project proponents, specifically BP and BOTAS.

The main requirements are set out in the following sections.

3.2 NATIONAL REGULATIONS ON PUBLIC CONSULTATION

The principle legislation is the Environment Law (Law Number: 2872) of August 1983. Article 10 of the "Environment Law" requires an Environmental Impact Assessment (EIA)³ report for investment projects that have the potential to create adverse environmental effects. 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.

However, the BTC Project in Turkey is governed by the Host Government Agreement (HGA).

This legislation requires that the impact assessments be released to the public for review and comment in accordance with the following procedures:

- Affected public and non-governmental organisations shall be notified about the nature of the proposed project during the development of the EIA. This shall be done through dissemination of information to these organisations through meetings and exhibitions.
- Following the completion of the EIA, the public shall be provided with information on the environmental aspects of the project to enable it to comment with respect thereto. To facilitate this process, the EIA and a Non Technical Summary (in the Turkish language) shall be made available in a public place for review and comments. In addition, an information copy of the Non Technical Summary shall be submitted to the Turkish Government simultaneously.

3. The legislation refers to an Environmental Impact Assessment, rather than an Environmental and Social Impact Assessment.

- A maximum of 60 days shall be allowed for public comments, and the public concerns (through modification of the EIA, if necessary) shall be included in a final EIA that shall be submitted to the Turkish Government.
- Once approved by the Government, MEP Participants/BOTAŞ shall implement the mitigation and monitoring activities specified in the EIA. The results shall be published in reports available to the public and submitted to the appropriate State Authorities. The EIA monitoring programme shall be updated as required on an informal basis.

3.3 INTERNATIONAL STANDARDS ON PUBLIC CONSULTATION

3.3.1 World Bank Group (including the IFC)

The World Bank Group's *Environmental Assessment Policy (OP 4.01, January 1999)* requires that project-affected groups and local non-governmental organisations (NGOs) be consulted during the impact assessments process about the project's potential environmental and social impacts. The purpose of this consultation is to take local views into account in designing the environmental and social management plans as well as in project design. For complex projects where the environmental impacts and risks are high, the policy requires public consultation at least twice: first, shortly after environmental screening and before the terms of reference for the EIAs are finalised and secondly, once a draft EIA Report is prepared. Consultation during project execution is also required. Section 5 summarises the consultation programme for the EIAs, and confirms that the project meets and indeed exceeds these requirements.

The IFC's manual '*Doing Better Business Through Effective Public Consultation and Disclosure: A Good Practice Manual*' provides action oriented guidelines aimed at ensuring that consultation is both effective and meaningful. The guidelines emphasise the need for the project sponsor to ensure that the process of public consultation is accessible to all potentially affected parties, from national to local level. Emphasis is placed on the engagement of local stakeholders, namely people who are likely to experience the day-to-day impacts of a proposed project. On a practical level, the sponsor has to ensure that: i) all stakeholders have access to project information; ii) the information provided can be understood; iii) the locations for consultation are accessible to all who want to attend; and iv) measures are put in place which ensure that vulnerable or minority groups are consulted.

The consultation requirements for projects requiring physical or economic displacement are covered by World Bank '*Operational Directive 4.30: Involuntary Resettlement*⁴' and outlined in the IFC's '*Handbook for Preparing a Resettlement Action Plan*'. The pipeline does not involve any physical resettlement, but the project is undertaking a land acquisition process to address the economic resettlement associated with the project.

The project sponsor is required to initiate and facilitate a series of consultations with project stakeholders throughout the planning and implementation of the procedures outlined by land acquisition process. The objective of these consultations is to ensure the participation of affected parties in their own resettlement planning and implementation. In particular, the following areas require consultation:

- Alternative project design;

4. January 2002

- Assessment of project impacts;
- Resettlement strategy;
- Compensation rates and eligibility for entitlements;
- Choice of resettlement site and timing of relocation;
- Development opportunities and initiatives;
- Grievance redress procedures and dispute resolution; and
- Methods and mechanisms for monitoring and evaluation and implementing corrective actions.

There are other World Bank Group policies including:

- Operational Policy 14.70: Involving Non-Government Organisations in Bank-Supported Activities;
- Operational Policy 4.04: Natural Habitats; and
- Operational Policy 4.11: Safeguarding Cultural Property.

These also include provisions for public consultation. These requirements focus on early consultation with affected people and NGOs, early disclosure of information, and providing information in a way that allows informed consultation with stakeholders and project-affected people.

In addition to the requirement for consultation with stakeholders, the World Bank Group has specific requirements for disclosure of documentation resulting from the EIA process. This includes:

- Preparation and publication of a Public Consultation and Disclosure Plan (PCDP) for consultation;
- Disclosure of the draft EIA in public places in - country and to the World Bank Infoshop (at least 60 days prior to the IFC board date⁵), including a Non Technical Summary in the local language to local stakeholders; and
- Preparation of an Environmental Action Plan (EAP) containing social as well as environmental measures designed to manage, mitigate and monitor the impacts identified during development of the EIA. This also has to be released to the World Bank Infoshop and be made available locally prior to presentation of the project to the IFC board.

3.3.2 European Bank for Reconstruction and Development (EBRD)

The EBRD's principles of public consultation are documented in the Bank's Environmental Policy (EP), Environmental Procedures (EPr), and the Public Information Policy (PIP). While the EBRD requirements reflect some of the other international financial institution requirements (eg World Bank for public sector and IFC for private sector), there are some important additional requirements with reference to European Union requirements and international conventions and treaties.

The EBRD standards require that projects be held to the more stringent of national standards and European Union standards. For those areas where there are not European Union standards, the EBRD relies on the more stringent of national and World Bank Group

5. The Pelosi amendment to the World Bank procedures for disclosure requires a 120 day disclosure period at the World Bank Info Shop prior to the project board date to ensure a positive vote at the board from the US Executive Director.

standards. In the area of public consultation, the European Union requirements are set out in the EIA Directive. In addition, EBRD requires that the Espoo Convention in its Public Information Policy and Environmental Policy for any project that may have trans-boundary impacts be followed, regardless of whether the countries involved are party to the convention or are members of the United Nations Economic Commission for Europe (UNECE). This is in line with EU standards. EBRD also concurs with the principles of the Aarhus Convention, which is specifically mentioned in the Public Information Policy.

3.3.2.1 A-level requirements

In the case of significant 'greenfield', major expansion or transformation-conversion operations which have been classified as requiring an Environmental Impact Assessment, those potentially affected must have the opportunity to express their concerns and views about issues such as operation design, including location, technological choice and timing, before a decision on EBRD financing is made. At a minimum, sponsors must ensure that national requirements for public consultation are met and that EBRD's own public consultation procedures are met. The Bank's Board of Directors will take into account the comments and opinions expressed by consultees, and the way these issues are being addressed by sponsors, when considering whether to approve an operation.

3.3.2.2 Scoping

Both the EBRD Environmental Procedures and the Public Information Policy require a thorough scoping procedure for all 'A' level operations, which will involve the project Sponsor consulting with representatives of the locally affected public and with government agencies, as well as with other organisations.

3.3.2.3 Disclosure of EIA documentation

Following the completion of environmental investigations, EBRD requires that the public is provided with adequate information on the environmental aspects of the operation to enable them to provide the project Sponsor with comments on the proposals. To facilitate this, the project Sponsor must make the Environmental Impact Assessment and an Executive Summary publicly available, in accordance with relevant national legislation, and allow sufficient time for public comment prior to the Bank's Final Review of an operation and its consideration by the Board. For private sector operations there will be a minimum of 60 days between the release of the EIA and the date of Board consideration.

EBRD strongly encourages project sponsors to place EIAs on their websites to improve public accessibility to the documents, and to otherwise release information in electronic, as well as written format. Where an EIA has been released on a website, the EBRD's website will provide a direct link to the project sponsor's website.

EBRD encourages project sponsors to leave EIAs in the public domain indefinitely, and at least for the life of the Bank's involvement with the project. In no case should the EIA be removed prior from the public domain prior to Project Completion, and will in any event, remain permanently in the public domain through EBRD offices in London and the country in which the project is located.

3.3.2.4 Project summary documents

A Project Summary Document (PSD) will be prepared for each project, and will be released on the Bank's website with an Environmental Annex which summarises the results of

environmental due diligence and the environmental action plan, at least 30 days prior to consideration of the Board of Directors.

3.3.2.5 On-going consultation and disclosure

For projects that have raised significant environmental or health and safety issues, or which have aroused the particular interest of the public or NGOs, the EBRD encourages the commitment to on-going information and communication programmes. For example, the Bank may require the results of ongoing environmental monitoring to be made available to the public.

3.3.2.6 International conventions and treaties

The EBRD, within the framework of its mandate, supports the Convention on Environmental Impact Assessment in a Transboundary Context. In this context, the Environmental Policy and the Public Information Policy state that the requirements outlined in the Convention on Environmental Impact Assessment in a Transboundary Context (the Espoo Convention) must be followed regardless of whether the country affected has ratified the convention. In addition, the EBRD takes into account the Aarhus Convention, along with other relevant international conventions, in the implementation of its Environmental Policy.

3.3.3 European Commission

Although European Commission legislation does not apply to Turkey, this is included as best practice. European requirements for stakeholder involvement in the EIA process are specified in the 1985 Directive (85/337/EEC) on Environmental Assessment, as amended by Directive 97/11/EEC. The review of the implementation of the Directive 85/337/EEC is provided in Directive 85/337/EEC.

The 1985 Directive ensures that the Member States make information on proposed activities available to the public. The public concerned is given the opportunity to express an opinion before the project is initiated. The Directive requires that the Member States determine detailed arrangements for such information and consultation including identification of the public concerned, places where the information can be consulted, ways in which the public can be informed and consulted, and timeframe during which the consultation should be conducted.

The 1997 Directive supports the requirements put forward in the 1985 Directive, and adds a requirement to conduct public consultation for projects that are likely to have significant transboundary environmental effects. The Directive specifies that it is the responsibility of both a Member State in whose territory the project is intended to be carried out, and a Member State likely to be affected by the proposed project, to inform the public of the Member State likely to be affected by the proposed project.

3.4 CORPORATE POLICY

3.4.1 BP policy on social and environmental protection

BP aims to operate in a socially and environmentally responsible way, respecting the cultures and rights of individuals in the different countries in which BP works.

BP seeks to create mutual understanding and build constructive relationships with local people and non-governmental organisations interested in BP's business and concerned about its impact on individuals, society and the environment.

3.4.2 BOTAŞ environmental policy

A set of policies has been established for the execution of all work undertaken by, on behalf of, the BTC Project Directorate. The policies are referenced in Sections 3.2 and 3.3 of the Environmental Management and Monitoring Plan (EIA Appendix C1).

All BOTAŞ BTC Project personnel and the contractors' personnel shall be individually and collectively responsible for adhering to, and effective application of, the policies and principles in the environmental policy statement.

Table 3.1 International Standards on Public Consultation

	World Bank Group (including the IFC)	European Bank for Reconstruction and Development (EBRD)	European Commission
Policy Requiring Public Consultation	Operational Directive 4.01 Environmental Assessment and its successor documents. Operational Directive 4.30 Involuntary Resettlement.	Public Information Policy, Environment Policy, and Environmental Procedures.	Directive 85/337/EEC on Environmental Assessment, as amended by Directive 97/11/EEC and Directive 90/313/EEC on Freedom of Access to Information on the Environment.
Requirements			
Who should be consulted?	Directly and indirectly affected stakeholders, and those with an interest who feel they may be affected.	The public should be informed of ongoing project developments supported by EBRD.	Directly and indirectly affected stakeholders, or representatives of affected groups.
Why involve the public?	Minimises conflict and delays; increases transparency; empowers people ensuring that their views are taken into account during project design and development of environmental and social management plans.	Minimises conflict and delays; increases transparency; empowers people ensuring that their views are taken into account during project design and development of environmental and social management plans.	Improves the quality and effectiveness of EIAs and project design and operation.
When should stakeholders be involved?	At a minimum, during scoping and screening stages, before the Terms of Reference for the EIAs are finalised and on the draft EIA. For complex projects where the environmental impacts and risks are high consultation during project execution is also required.	A project summary document (PSD) must be prepared for each private sector project and released at least 30 days prior to the consideration by the Board of Directors. An Environmental Impact Statement (EIA) must be prepared for Category 'A' projects (includes offshore gas and oil production) and released at least 60 days prior to consideration by the Board of Directors.	As early as possible in the EIA/project process and throughout the EIA/project cycle.
What areas require consultation?	Alternative project design; assessment of project impacts; resettlement strategies; compensation rates and eligibility for entitlement; choice of resettlement sites and timing of relocation; development opportunities and initiatives; grievance redress procedures and dispute resolution; methods and mechanisms for monitoring, evaluation and implementing corrective actions.	Operation design, including location, technological choice and timing.	Transboundary environmental effects.

**BTC PROJECT EIA
TURKEY
FINAL EIA**

	World Bank Group (including the IFC)	European Bank for Reconstruction and Development (EBRD)	European Commission
Responsibilities for Public Consultation	<p>Responsibilities should be allocated clearly and early on. Project sponsor should ensure that:</p> <ul style="list-style-type: none"> • All stakeholders have access to project information • The information provided can be understood; • The locations for consultation are accessible to all who want to attend • Vulnerable or minority groups are consulted. 	<p>It must be ensured that:</p> <ul style="list-style-type: none"> • The EIA Executive Summary is made available in the local language • The EIA and EIA Summary are made available in the EBRD's business Information Centre (BIC) in London (notice of this should be posted on the EBRD website) • Clients are recommended to place EIAs on their own websites 	<p>The Member carrying out the project and the Member State(s) likely to be affected by the project must inform the affected public. It must be ensured that detailed arrangements within the Member States is made for:</p> <ul style="list-style-type: none"> • Identifying the public concerned • Providing places where information can be consulted • Providing suitable methods for informing and consulting the public • A suitable timeframe for consultation is developed
Other World Bank Group policies	<ul style="list-style-type: none"> • Operational Policy 14.70: Involving Non-Governmental Organisations in Bank-Supported Activities • Operational Policy 4.04: Natural Habitats • Operational Policy 4.11: Safeguarding Cultural Property 		
Requirements of these OPs	<p>Early consultation with affected people and NGOs; early disclosure of information; providing accessible information.</p>		

**BTC PROJECT EIA
TURKEY
FINAL EIA**

	World Bank Group (including the IFC)	European Bank for Reconstruction and Development (EBRD)	European Commission
Comments	<p>Specific requirements for disclosure of documents relating to the EIAs on projects seeking international funding include:</p> <ul style="list-style-type: none">• Preparation and publication of a Public Consultation and Disclosure Plan (PCDP) for consultation• Disclosure of draft EIA (at least 60 days before IFC board date) including a non-technical summary in public places (in-country and are WB Infoshop)• Preparation of an Environmental Action Plan (EAP) containing social and environmental measures to manage, mitigate and monitor the impacts identified in the EIA		<p>The European legislation does not apply to Georgia. It is included as an example of best practice.</p>

4 THE CONSULTATION PLAN FOR PRE-CONSTRUCTION

4.1 INTRODUCTION

Consultation is an ongoing process that has taken place throughout both the EIA process and will continue during the construction and operational phases of the project. It comprises the following discrete activities:

Phase 1: Stakeholder identification and preliminary consultation / scoping

- Stakeholder categorisation and identification; and
- Preliminary consultation:
 - liaison with national and regional authorities; and
 - identification of key project constraints.

Phase 2: Information distribution and introductory meetings

- Distribution of ESIA Information Package and Project Leaflet; and
- Introductory meetings with authorities.

Phase 3: Impact identification

- Meetings with provincial, district and settlement level authorities (elected and appointed);
- Meetings with national NGOs, interest groups and media;
- Meetings with local NGOs, media and other local interest groups;
- Community meetings along the length of the pipeline;
- Consultation with residents in the vicinity of the proposed BTC Marine Terminal and fishermen in the Gulf of Iskenderun;
- Dialogue and meetings with International Finance Institutions (pre and post mandate);
- Consultations through various preparatory phases of the land acquisition process; and
- Additional consultation activities carried out for the Resettlement Action Plan (RAP).

Phase 4: Development of mitigation measures

- Road testing project mitigation measures with key stakeholders.

Phase 5: Disclosure of the draft EIA

- Information distribution of disclosure materials;
- Public announcements and engagement of the media;
- Disclosure meetings with local residents, local NGOs and interest groups, local media, national NGOs, interest groups and media, international NGOs, local, provincial authorities and State authorities; and
- Collection and incorporation of comments and feedback.

Phase 6: Disclosure of the Resettlement Action Plan

Phase 7: Ongoing consultation during construction and operation (see Section 6)

The activities that have, or will be, carried out in each phase, are detailed in the following sections. The proposed timing of those activities not yet completed is summarised in Section 6. As noted in the introduction to this document, the public consultation activities will be reviewed throughout the project and plans will be amended if necessary to best serve the project.

4.1.1 IFC Requirements for Public Disclosure

For Category A projects⁶, such as the BTC Pipeline, the **IFC Requirements for Consultation and Disclosure on the draft EA⁷ Report** state that the project should give public notification in the country of operation and make the draft EIA report available at public places readily accessible to project stakeholders for at least 60 days. Particular effort is to be given to disclosure of the draft EIA to project-affected groups and other interested parties for their comments and input, as this is to be the first completed description of project impacts and proposed mitigation actions made available to the public. The draft EIA must include all supplements and addenda to the EIA (as requested by the IFC) and the responses to the public consultation process undertaken in preparing the draft EIA. A Non Technical Summary (NTS) of the draft EIA in the local language must be proactively disseminated to local stakeholders, through mechanisms such as stakeholder representatives.

4.1.1.1 Overview of Disclosure Activities

In compliance with the above requirements, public disclosure of the draft EIA in Turkey was conducted over a 60-day period from end of June to end of August and comprised the following activities (these are explained in more detail under Phase 5 in Section 4.6 of the PCDP).

- Preparation and proactive dissemination of disclosure materials (draft EIA, NTS and Community Pamphlet) through local authorities such as the Sub-governors and Muhtars;
- Notification to the public through advertisements in the local language placed in national and local media outlets;
- Design and organisation of public disclosure meetings with key stakeholder groups in publicly accessible locations along the pipeline route (including project affected people, international, national and local non governmental organisations and interest groups, state and local authorities; and
- Mechanisms developed to enable receipt, documentation and responses to comments made on the draft EIA.

An overview of the consultation and disclosure process conducted by the project is provided in Figure A1.2.

4.1.1.2 Revision of EIA

On completion of the disclosure activities, the project revised the draft EIA to incorporate the comments and feedback received from stakeholders during public disclosure, and to document the disclosure activities undertaken and to detail additional work undertaken during that period. An outline of the project's response to comments made and issues raised during disclosure is provided in Appendix A1 (PCDP) and Appendix A8 (Consultation Results) of the EIA. The final EIA (including supplements, addenda and PCDP) was then submitted to

6. IFC classifies a project as Category A if it is likely to have significant adverse environmental impacts that are sensitive, diverse and unprecedented. A potential impact is considered sensitive if it may be irreversible, affect vulnerable groups or ethnic minorities, involve involuntary displacement and resettlement, or affect significant cultural heritage sites.

7. IFC typically refer to Environmental Assessment (EA) in the context of Category A projects. However the term Environmental Impact Assessment (EIA) has been used in the case of BTC Turkey Pipeline Project.

the Turkish Ministry of Environment for approval determination, which was granted on 18th October 2002.

4.1.1.3 Supplementary Lenders Information Pack

A Supplementary Lenders Information Pack (SLIP) to the final EIA has been prepared and submitted to the IFC. The Addendum comprises the project's response to comments made by the IFI Lenders Group review of the EIA during the public disclosure period. In addition, the updated PCDP and complete Resettlement Action Plan (RAP) were also submitted to the IFC. The process following submission of the Addendum includes a documentation review by the IFC (and revision where required), release of documentation to the World Bank Infoshop and international community, and public disclosure for 120 days in accordance with the Pelosi Amendment⁸ and IFC requirements. Following this, the World Bank's US Board of Executive Directors will review the documentation as part of approval determination. Following Board review, the final stage is the updating of the EIA, (to address comments made during that review), and its re-release to the Infoshop and locally. Figure A1.2 illustrates this aspect of the EIA process for BTC Turkey.

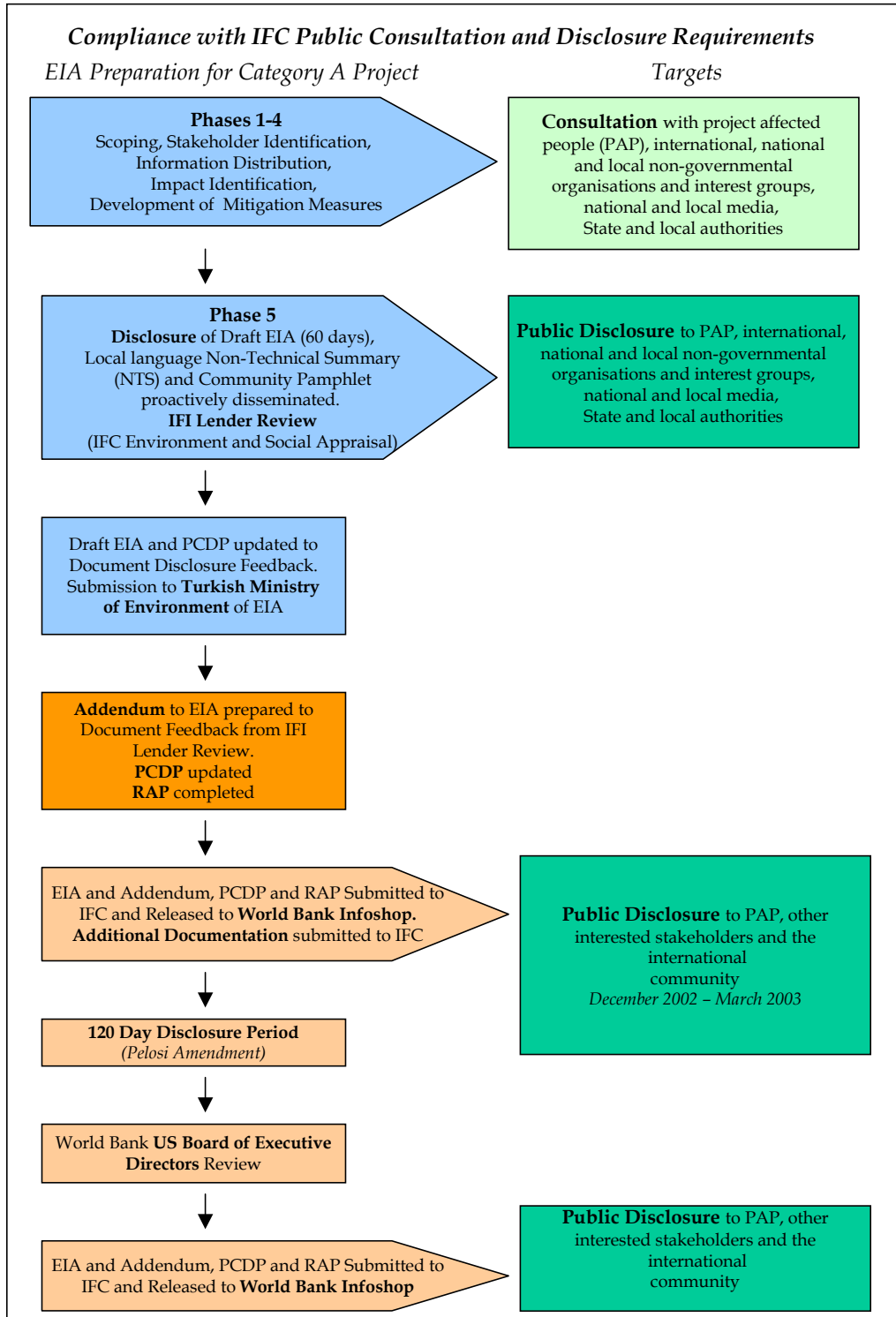
4.1.1.4 Additional Project Documentation

Additional documentation has been prepared by the BTC Project although was it not distributed or exhibited during the public disclosure process. These documents will be reviewed by the IFC and include the following.

- BTC Resettlement Action Plan (RAP);
- Regional Review;
- Grand Executive Summary;
- Contaminated Lands Report;
- Social Scoping Report.

8. The Pelosi Amendment (US Code Title 22, Chapter 7, Section 262m) was passed by US Congress in 1989. It requires the World Banks' US Executive Directors to vote on a project if it meets the following criteria: that the environmental assessment is appropriate for the project and its impacts, and it is available to the Executive Directors and the public for at least 120 days prior to approval of the project by the Board of Executive Directors.

Figure A1.2



4.1.2 Consultation tracker

The consultation tracker is a computer database system referred to as a Property, Engineering, Referencing and Consultation System (PERCS) using Microsoft Access 2000 software. It is designed to manage and track data produced during the consultation activities and is being used to record and collate all consultation activities undertaken as part of the EIA. It has the ability to store details of all consultees/stakeholders, including information on the nature of the consultation undertaken, key issues raised, actions to be undertaken and the relevant contact details.

The tracker has been used to identify issues raised during settlement level consultation and other stakeholder meetings, in tracking such issues and delegating actions. It has also been useful in tracking correspondence with stakeholders and feedback from local residents outside of the planned activities. In addition, it enables data to be categorised by province, settlement, individual or an NGO.

4.2 PHASE 1: STAKEHOLDER IDENTIFICATION AND PRELIMINARY CONSULTATION

4.2.1 Stakeholder identification

At the beginning of the EIA process in summer 2000, BTC Co., BOTAŞ and their respective consultants worked together to identify the key stakeholders that should be consulted at various stages of the project. This process was completed with the identification of project affected land owners and users by the project and the Designated State Authority (DSA) during the preparation of the Resettlement Action Plan (RAP). It was agreed that these stakeholders should be divided into the following categories, each requiring a different consultative approach:

- **Authorities** comprising elected and appointed authorities at the national, provincial, district and settlement level (village heads known as *Muhtars*). The total number of authorities consulted is based on the number of provinces and districts traversed by the pipeline and districts affected by the marine terminal development, as well as all settlements that fall within the 4km pipeline consultation corridor. This gives a total of approximately ten provincial governors, 30 sub-governors and 326 *Muhtars*.
- **International, national and local non-government organisations (NGOs)** particularly those with an interest in environmental and social issues within the districts and provinces traversed by the pipeline and marine terminal and in Turkey as a whole.
- **Interest groups** comprising the media, university institutions and their foundations, people with local agricultural interests, cooperatives, local business establishments and business associations, chambers of commerce and others.
- **International finance institutions (IFIs)** including International Finance Corporation (IFC); Overseas Private Investment Corporation (OPIC); Export Import Bank of America (EXIM); Export Credits Guarantee Department

(ECGD), Japan Bank for International Cooperation (JBIC) and European Bank of Reconstruction and Development (EBRD).

- **Residents** including Project Affected People (PAP) whose land will be acquired from the urban and rural settlements within a 4km corridor of the pipeline route in the provinces of Ardahan, Kars, Erzurum, Erzincan, Gumushane, Sivas, Kayseri, Kahramanmaras, Osmaniye and Adana. Those people living in close proximity to the proposed BTC Marine Terminal as well as residents of coastal settlements along the Gulf of Iskenderun were also included in this category.

It is anticipated that, as the public consultation programme moves forward, other stakeholders will be identified and encouraged to participate. A complete list of all stakeholders identified and consulted thus far is provided in Appendix A2 to the EIA report.

4.2.2 Preliminary consultation

Preliminary consultation was carried out from September 2000 to January 2001 during the BE Phase of the BTC Pipeline Project. The aim of preliminary consultation was to inform national authorities and the relevant governors about the project and to allow for the identification of key constraints within the proposed 10km pipeline 'Corridor of Interest'. Issues raised during early consultation, initial environmental baseline studies and EIA scoping led to the narrowing of the pipeline corridor to a 500m 'Preferred Route Corridor'. A list of all stakeholders consulted during this Phase is provided in Appendix A2.

The following activities were undertaken as part of the preliminary consultation phase:

- During the pre-work field survey activities in September to October 2000, ten provinces were visited along the BTC Pipeline route. The provinces visited include Ardahan, Kars, Erzurum, Erzincan, Gumshane, Sivas, Kayseri, Kahramanmaras, Osmaniye and Adana. Within each of these provinces, meetings were held with the governors and other local authorities. The purpose of the meetings was to inform the relevant provincial authorities of the project, the upcoming field survey activities and to gauge their initial feedback. Information at this stage was provided verbally through informal individual presentations at the governors offices. The land acquisition requirements of the project were also introduced, with the officials informed that physical displacement of households and of settlements will be avoided.
- Following the above site visit, requests for information on project constraints⁹ were sent to the national authorities and governors during the period December 2000 to January 2001. These requests took the form of a letter accompanied by 1:100 000 maps showing the 10km pipeline corridor and a letter of authorisation from BOTAŞ. For each national authority, specific questions were asked, in relation to the authority of relevant ministries or directorates. All constraints highlighted have been recorded and will be included in the draft EIA. The responses of these authorities were reflected in the further narrowing of the corridor.

9. An example of a project constraint initially identified by national authorities and provincial governors is the existence of local infrastructure and development projects in the vicinity of the pipeline corridor.

4.3 PHASE 2: INFORMATION DISTRIBUTION AND INTRODUCTORY MEETINGS

4.3.1 Written information

The distribution of information on the project allows stakeholders to familiarise themselves with the project, thereby encouraging more meaningful participation in the consultation process.

Written material on the project was prepared in two formats.

- An EIA Information Package¹⁰ (see Appendix A3) was primarily prepared for, and distributed to, authorities (national to settlement level), NGOs and other interest groups (in English and in Turkish); and
- A Project Leaflet (see example in Appendix A3) was primarily prepared for, and distributed to, people in the vicinity of the pipeline route, Above Ground Installations (AGIs), primary construction camps and marine terminal development (in Turkish).

4.3.2 Introductory meetings

During August and September 2001, meetings were also held with provincial (10 Governors), district (22 sub-governors) and settlement heads (208 Muhtars¹¹) falling within the 4km consultation corridor traversed by the pipeline. Both elected and appointed authorities were represented at these meetings in addition to other local representatives such as District Directorate representatives of Agriculture, Cultural Heritage, etc., and local security (gendarme) and police forces. These meetings allowed for:

- Introduction and discussion of the project and associated EIA and consultation process;
- Distribution of Project Leaflets to the Muhtars (for distribution at the settlement level) prior to consultation with local residents;
- Identification of additional stakeholders; and
- discussion of issues of concern relating to the proposed project.

Key materials that were distributed and discussed at these meetings included:

- The EIA Information Package in Turkish;
- Provincial maps with the suggested centreline of the route;
- A leaflet describing the project; and
- Constraints maps.

10. The ESIA Information Package provides a summary of information on the project participants, project description, relevant legislation, the EIA process and the consultation programme. Maps showing the pipeline route through Turkey and the location of the marine terminal are also included. The ESIA Information Package was updated when additional project information became available. Appendix D comprises the most up to date versions of the document.

11. 208 Muhtars of the total 326 number of Muhtars within the 4km corridor were consulted.

The discussions held during these meetings assisted in refining the consultation process with local residents to ensure that they were appropriate to the local context.

4.4 PHASE 3: IMPACT IDENTIFICATION

4.4.1 Introduction

Information gathered during the impact identification round assisted in refining the terms of reference for the specialist EIA and SIA investigations and allowed for the ongoing identification of issues for input into project design. As part of the Detailed Engineering phase, feedback from stakeholder consultation was continually fed into the route development process leading to the determination of the 100m 'Specified Route Corridor', and finally to the 'Pipeline Centreline' and 'Construction Corridor' wherein physical displacement was indeed avoided. More information on route modifications as a result of consultation is provided in Section 4.4.7. To meet this objective, the following consultation activities were undertaken:

- Meetings with provincial, district and settlement level authorities (elected and appointed);
- Meetings with national NGOs, interest groups and media;
- Meetings with local NGOs, media and other local interest groups;
- Community meetings along the length of the pipeline;
- Consultation with residents in the vicinity of the proposed BTC Marine Terminal and fishermen in the Gulf of Iskenderun;
- Dialogue and meetings with international finance institutions (pre and post mandate);
- Consultations through various preparatory phases of the land acquisition process; and
- Additional consultation activities carried out for the RAP.

4.4.2 Meetings with authorities

As detailed above, the meetings took place during Phase 2 of public consultation (refer to Appendix A8 for documentation of correspondence with State authorities during Phase 2).

4.4.3 Meetings with national NGOs and other interest groups

Participation of the national NGOs and other interest groups including the media was sought through three meetings: a meeting of national media was held in Istanbul on 11th October 2001; a meeting of national and international NGOs and interest groups was held in Istanbul on 12th October 2001; and a meeting of national NGOs and interest groups was held in Ankara on 15th October 2001.

These meetings were led by BTC Co. and BOTAŞ, with key specialist input from the SIA and EIA consultants. The focus of these meetings was to inform the stakeholders of the project scope, the EIA and SIA activities and schedule and to solicit feedback on both environmental and social impacts as well as feedback on the proposed EIA and SIA consultation process. The SIA consultants recorded these meetings and the main points have been incorporated into the draft EIA Report for disclosure.

EIA Information Packages (in Turkish and English) were sent to NGOs, other interest groups and the national media prior to the meetings (see Appendix A3). Visual materials such as A0 sized project posters were displayed at the meetings (see Appendix A3).

Concerns arising from the national NGO and interest group meetings were captured in the consultation tracker and a series of meetings were held in Istanbul in December 2001 to follow up with seven NGOs who expressed specific concerns. These NGOs included Turkish Foundation for Combating Soil Erosion, Reforestation and the Protection of Natural Habitats (TEMA), Foundation for the Conservation and Promotion of the Environment and Cultural Heritage (CEKUL), Economic and Social Studies Foundation (TESEV), World Wide Fund for Nature (WWF) Birdlife/DHKD, Turkish Marine Environment Protection Association (TURMEPA) and representatives from Istanbul University Archaeology division.

Additional meetings with NGOs and interest groups were held prior to and during the disclosure period. To date additional meetings have been held with The World Bank, UNDP, TUDAV, CEKUL, WWF and the European Union Turkey representative.

4.4.4 Meetings with local NGOs and other interest groups

A total of eleven meetings were held with for local NGOs and other interest groups, with one in each province traversed by the pipeline, plus a meeting with local media in Adana. These meetings were held between the 17th September and the 28th September 2001.

These meetings were led by BTC Co. and BOTAŞ with key specialist input from the national SIA and EIA consultants. The aim was similar to the above, though these stakeholders generally provided more detailed information on locally important EIA/SIA issues due to their local level involvement in the project area.

ESIA Information Packages (in Turkish) were sent to NGOs and interest groups at least one week prior to the meeting (see Appendix A3). Visual materials such as A0 sized project posters were displayed at the meetings (see Appendix A3).

4.4.5 International finance institutions (IFIs)

Informal dialogue with International Finance Institutions (IFIs) commenced in early 2001 and continued until June 2001. This consultation formed pre-mandate dialogue with IFIs such as International Finance Corporation (IFC), European Bank for Reconstruction and Development (EBRD) and Overseas Private Investment Corporation (OPIC) and comprised project overviews and updates held in Washington DC, USA and London, England.

The first post mandate meeting with IFIs was held in January 2002 with IFC in Baku, Azerbaijan and an in-country field visit and formal meetings were held in April 2002 with IFC in Ankara, Turkey. An IFI Lenders Group comprising IFC, JBIC, EBRD, OPIC and independent consultants Mott McDonald conducted in-country visits to Azerbaijan, Georgia and Turkey during July and August 2002.

4.4.6 Settlement level consultation

4.4.6.1 Overall Objectives

The objectives of the settlement level consultation were to:

- Inform local residents and authorities about the project;
- Solicit their views and attitudes towards the construction of the pipeline, marine terminal, Above Ground Installation (AGIs) and the establishment of construction camps;
- Identify and respond to key issues of concern in relation to project activities, including land acquisition procedures and associated facilities; and
- Ensure equal access to information and ongoing opportunities for potentially affected people to engage with the project.

To meet these objectives, the settlement level consultation comprised two main components: (1) *community meetings* and (2) interviews conducted at the settlement and household level in the form of detailed *questionnaires*.

The consultation activities, all of which were facilitated by the national consultants, KORA and Veri Arastirma, were conducted along the pipeline route over a 6-week period, from the 3rd September 2001 to 20th October 2001. Additional site-specific settlement level consultation in the vicinity of the marine terminal, AGIs (four pump stations and one pressure reduction station) and the three primary construction camps was undertaken soon after the pipeline consultations during October 2002, December 2001 and February 2002 respectively. Table 4.2 provides an overview of the main consultations undertaken at the settlement level.

Table 4.2 Main Settlement Level Consultation Activities

Consultation	Date	Community Meetings	Questionnaires
Pipeline	3 rd September – 20 th October 2001	Meetings held in 102 settlements* (94 rural settlements and eight district centres) Consultation with local authorities (elected and appointed) conducted in parallel with community meetings * Total of 248 settlements initially identified within a 4km consultation corridor (2km either side of the pipeline)	88 settlements (80 rural settlements and eight district centres) targeted for household and settlement level questionnaires within 4km pipeline corridor 1,328 household questionnaires 88 settlement questionnaires
Marine Terminal	8 th – 19 th October 2001 8 th – 9 th February 2002 15 th -19 th August 2002	Nine settlements in the marine terminal area Consultation with local authorities (elected and appointed) Additional consultation (focus groups) and information gathering at settlements neighbouring the marine terminal Additional consultation with fishermen, local authorities, fishing companies, fishing experts etc during the impact analysis undertaken by Turkish Marine Research Foundation (TUDAV).	Nine settlements targeted for household and settlement level questionnaires in the marine terminal area (comprising neighbouring settlements and several in broader study area) 200 household questionnaires Eight settlement questionnaires
Additional Settlements (Identified as having land intersected by the pipeline)	11 th – 20 th January 2002	-	Telephone interviews conducted with <i>Muhtars</i> (or other key local representatives) of 210 settlements (not previously consulted). 210 settlement questionnaires
Pump Stations and Pressure Reduction Station (AGIs)	4 th December – 27 th December 2001 April 2002 August – September 2002	Representatives from 27 settlements attended 13 community meetings within an approximate 5km radius of AGIs. Local authorities within one hour driving distance from AGIs. Consultation meeting with Sogutlukaya residents in the vicinity of Pump Station 1 in Ardahan. Follow up consultation meeting with Sogutlukaya residents in the vicinity of Pump Station 1 in Ardahan to further discuss concerns.	17 settlements surveyed within a 5km radius of AGIs. 132 household questionnaires 17 settlement questionnaires
Construction Camps	February 2002 April 2002	Representatives from 16 settlements attended 13 meetings within 5km radius of proposed construction campsite. Telephonic consultation with ten local authorities at the district level. Two additional consultation meetings with residents of Mehmetbey and Mahmutbey in the vicinity of Lot C construction camp in Kahramanmaras to consult on a change in location.	Ten settlements (not previously consulted) within 2km radius of proposed construction campsite (including two settlements where only settlement level questionnaires were administered). 77 household questionnaires 8 settlement questionnaires

4.4.6.2 SETTLEMENT SELECTION

4.4.6.2.1 Pipeline

A 4km pipeline ‘*consultation corridor*’ (i.e., two kilometres either side of the centreline) was identified. This was consistent with the consultation study area determined in Georgia and Azerbaijan, and importantly was determined as a sufficient width to capture the majority of social receptors (e.g., impacted settlements and key stakeholder activities such as farming) within the broad project area of influence.¹² Within this consultation corridor, 248 settlements (rural settlements and district centres) were initially identified¹³.

Of these, 102 settlements were selected for community meetings (94 rural settlements and eight district centres) and 88 settlements (80 rural settlements and eight district centres) for the survey. The selection criteria for the determination of the above settlements included population size¹⁴, proximity to the pipeline and other settlements, and settlement structure (i.e., the socio-economic and cultural composition of a settlement).

4.4.6.2.2 Marine Terminal

Settlement selection for the marine terminal was based on the determination of an initial area of influence encompassing all primary receptors of impacts within the broad project area and the identification of associated stakeholders. The settlements selected comprised four neighbouring settlements most likely to be directly impacted by the proposed marine terminal development (including impacts on offshore activities such as fishing) and five non-neighbouring settlements situated within the broader study area of the Iskenderun Gulf. Thus, a total of nine settlements within Yumurtalik and Ceyhan districts were selected for consultation.

4.4.6.2.3 AGIs and Construction Camps

The proposed locations of the four *pump stations* (PT) and one *pressure reduction station* (PRS) were determined in December 2002 in the provinces of Ardahan, Erzurum, Erzincan, Sivas and Kahramanmaras. The proposed locations of the three primary construction camps were determined in January 2002 in Erzurum, Sivas and Kahramanmaras provinces. Discrete studies were undertaken in order to consult with settlements potentially impacted by these facilities.

This selection of settlements to survey was determined on the basis of three criteria: 1) settlements likely to be directly impacted upon by construction impacts such as increased traffic flows; 2) settlements likely to experience disturbance from construction workers located within walking distance; and 3) settlements likely to be affected by construction workers located within driving distance (assumed to be within a one hour car journey). These calculations resulted in three areas of influence – 2km, 5km and in excess of 5km. Factors such as topography, road network and access to settlements (from the AGI or campsite) were also considered in the determination of settlements to be surveyed.

The locations for the 52 *block valves* along the pipeline route were determined in March 2002. Settlements within 2km of the proposed block valves and associated access roads were

12. Settlements that were not within the 4km corridor, but had land intersected with the pipeline were also included into the study and the muhtars were interviewed by telephone.

13. The 248 settlements represent *all* settlements (rural settlements and district centres) within the 4km pipeline corridor, based on the routing of the pipeline at the time of the survey.

14. Settlement selection focussed primarily on targeting those settlements with a population over 500, however to ensure coverage of smaller settlements with populations less than 500, a method of systematic random sampling was used to determine the sample.

identified and a desktop study undertaken, based on aerial photos. Due to their location within the existing pipeline corridor, for which sufficient baseline data had already been gathered, no additional consultation or socio-economic surveys were undertaken. Their locations and associated impacts (although of low significance) were disclosed as part of the disclosure process.

4.4.6.3 Community Meetings

4.4.6.3.1 Objectives of Meetings

As outlined in Table 4.2, community consultation meetings were held with local residents in the vicinity of the pipeline, marine terminal, AGIs and primary construction camps between September 2001 and April 2002.

The core objectives of these consultation meetings were to:

- Identify and inform as many potentially affected local residents and associated local authorities as feasibly possible about the project;
- Utilise a verbal medium through which project information could be provided to all members of the local settlements (in addition to the distribution of written project information);
- Solicit the views and attitudes of residents towards the project and associated facilities and identify key issues of concern;
- Identify and develop an understanding of the potential socio-economic impacts associated with the project; and
- Encourage the familiarisation of residents and authorities to the project prior to the administration of questionnaires to enable informed responses during data collection.

4.4.6.4 Broad Representation Levels

The 102 pipeline settlements consulted via consultation meetings represent:

- 41% of the total settlements in the pipeline corridor; and
- 89% of the total population of settlements identified in the pipeline corridor.

4.4.6.5 Approach to Community Meetings

4.4.6.5.1 Pre-Fieldwork Preparation - Induction Training Workshop

Prior to the fieldwork activities in late August 2001, a formal Induction Training Workshop was held over three days for the national consultants. The workshop was jointly facilitated by the international and national consultants and the project and had the following aims and objectives:

- To generate a common understanding of the BTC Project;
- To share experience and knowledge on EIA, specifically SIA;
- To review proposed consultation methodologies and tools; and
- To develop the settlement level and household level questionnaires.

The workshop combined formal presentations with small focus group discussions and covered the following issues:

- Project description (project construction and operation);
- The environmental and social impact assessment process;

- Generic socio-economic impacts associated with pipeline projects and marine terminals;
- Data collection process (design, review and familiarisation of questionnaires and survey methodologies);
- Health and safety training (including driver training);
- Role play of settlement level consultation meetings;
- Overview of field team communication and responsibility; and
- Outline of field report back formats and consultation materials.

A Field Survey Response Pack was developed for the field survey teams to provide them with additional information about the project and help them to respond to local concerns or queries.

4.4.6.5.2 Team Composition

All consulted and surveyed settlements were first visited by an *organisational team*, formed by representatives from Veri Arastirma. They were responsible for:

- Liaising with the *Muhtar* (or other local authorities where necessary);
- Arranging the time and venue for the meeting in advance of the meeting;
- Identifying any conditions that might hinder the timing of the meetings or data collection (e.g. local bazaars, weddings, etc.);
- Publicising the meeting to neighbouring settlements and inviting them to the meeting; and
- Distributing the consultation materials, namely, an ESIA Information Package and leaflet to *Muhtars* and local residents, respectively.

The *meeting team* was led by a trained facilitator from KORA (Middle East Technical University) and included representatives from BOTAS, with additional support provided by representatives of BTC Co. and international consultants, ERM, both in the field and from Ankara. Each meeting team also had a number of minute takers to ensure that each session was recorded accurately. The organisation and meeting teams comprised both female and male members and were designed to ensure the attendance and participation of women in more traditional and/or conservative areas where they may have otherwise not attended the meetings. In all instances, the national consultants worked closely with the project and international consultants and advised on methods of consultation that were both culturally acceptable, socially appropriate and able to be adapted to local circumstances¹⁵.

4.4.6.5.3 Meeting Organisation

Two separate field teams were established to undertake the meetings along the entire pipeline route, and were divided into a northern region and southern region group. This assisted in enabling the completion of the meetings within a short time period.

The meetings were typically held at the local school, mosque, coffee house or outdoors in a centrally accessible location determined by the villagers themselves.

All residents of settlements in close proximity to the pipeline, AGIs and construction camps were invited to attend the meetings, in addition to the *Muhtars* and other key local representatives. In some instances, other local authorities such as the mayors, sub-governors

15. For example, before approaching individuals in settlements, the consultation teams verified with the *Muhtars* that the 'daily context' was normal, ie no large festivals, holidays, religious celebrations, markets or funerals. When interviewing people, the 'household head' which in Turkey generally means the senior male was approached. Consultation meetings were held in Turkish and facilitated by the national consultants to ensure understanding of a level of technical information.

and governors also attended the meetings. Residents of neighbouring settlements were also invited, thus increasing participation and the dissemination of project information to a wider stakeholder group.

Community meetings in the vicinity of the proposed BTC Marine Terminal were conducted with a range of stakeholders including local and non local fishermen, representatives from several fishing associations and commercial fishermen, local residents from settlements neighbouring the marine terminal and local authorities (including governors, sub-governors, mayors and Muhtars).

Public announcements were made at every settlement, most commonly through the mosque loudspeaker, to ensure that all project affected people were well informed of the details of the proposed meeting, and to provide the opportunity for all interested residents to attend the meeting regardless of their gender, age, ethnicity or religious background, etc. In addition to public announcements, the organisation team went from door-to-door to personally invite individual residents and encourage them to attend and participate. In some cases where houses were located some distance from the meeting location, residents were provided with transportation to attend the meetings.

4.4.6.5.4 Meeting Format

The format of the meetings comprised a presentation on the BTC Project, which included an outline of the purpose of the meeting, a description of the project and an overview of the timing and nature of construction activities. Generic potential environmental and social impacts, both positive and negative, were then explained. Participants were then informed of the various mechanisms for providing feedback on the project, which led into an open-ended question and answer session, enabling attendees to raise issues of concern or clarify areas of uncertainty.

4.4.6.5.5 Ensuring Access and Participation

The project paid specific attention to the use of various approaches that aimed to proactively engage the communities during consultation meetings. Meetings were designed to encourage open discussions on the information presented and to allow attendees to provide feedback and an opportunity to voice any concerns regarding the project.

To ensure that project-affected residents had equal opportunity to receive project information, raise concerns or make verbal or written comments, a number of approaches were taken in relation to the meetings. These included:

- Holding separate women's meetings, either at a separate time and place to the men's meeting, in parallel with the men's meeting, or through private visits to individual's homes (facilitated by female members of the meeting team);
- Allowing meeting participants to make comments formally during the meeting or informally on a one-to-one basis following the meeting;
- Ensuring that participants had opportunities to record their concerns in writing;
- Ensuring that participants had sufficient time in which to voice their concerns during the meeting or following the meeting (verbally or in writing);
- Ensuring that participants who were unable to read or write had the opportunity to listen to presentations and verbally reflect their concerns to minute takers (either during or after the meetings);

- Simplifying the language used during the meeting presentations and question and answer sessions to avoid misunderstanding or lack of understanding through the use of complicated or technical jargon; and
- Ensuring project affected settlements had the opportunity to access and attend the meetings regardless of their gender, ethnicity, religion, etc.

4.4.7 Questionnaires

4.4.7.1 Objective of Questionnaires

The objectives of the questionnaires were to:

- Gather qualitative and quantitative information on socio economic baseline conditions from settlements consulted through community meetings¹⁶ and additional settlements with land intersected by the pipeline;
- Enable respondents to raise concerns regarding perceived impacts associated with the project, both positive and negative;
- Follow on from the consultation meetings by ensuring respondents were informed about the project and to attempt to fill any gaps or respond to queries not covered during the meetings; and
- Provide sufficiently detailed information of the pipeline corridor at the settlement and household level to enable an identification of issues, an assessment of potential impacts and the development of mitigation measures.

To meet these objectives, a project specific settlement level questionnaire was developed to allow for the gathering of information on the settlement as a whole (i.e., a village or district centre) and a household questionnaire developed to allow for the gathering of in-depth information at the household level.

Table 4.1 outlines the extent of settlements surveyed as part of settlement level consultation. A total of 88 settlements (including eight district centres) were surveyed for the pipeline and a further nine for the marine terminal. As a result of the site-specific consultation in the vicinity of the AGIs and construction camps, a further 27 settlements were surveyed. The Muhtars of the additional 210 settlements, whose land is intersected by the pipeline were also surveyed via telephone.

4.4.7.2 Respondent Selection

4.4.7.2.1 Settlement Level Questionnaires

These questionnaires sought to gain quantitative information about the settlement, for example, total population, total area of land, total number of plots, extent of in-migration, etc. The questionnaires targeted the Muhtar and, where necessary, other authorities or key representatives within the rural settlement (e.g., members of the Council of Village Elders, teachers, *Imams* (head of the mosque) and health workers) were interviewed. If the Muhtar was not available, the interviewer would identify one of the above representatives or an equivalent individual depending on their willingness and ability to participate.

4.4.7.2.2 Household Level Questionnaires

16. Refer to Table 4.1 for an outline of the sample of settlements consulted and surveyed within the 4km consultation corridor and in the vicinity of the pipeline, marine terminal, AGIs, and construction camps.

These questionnaires explored both quantitative information (e.g., monthly income, amount of land owned, levels of literacy etc) and qualitative information (e.g., what benefits do you expect to derive from the BTC Project? What are your main concerns about the project?). Doing this allowed links to be made between socio-economic conditions / status and areas of concern. The household questionnaires were administered through face –to-face interviews with local residents.

On average, 60% of the questionnaires (qualitative and quantitative sections) were administered solely with the household / family head (generally male). In order to ensure female contribution to the data gathered, a target was introduced aiming to guarantee that 40% of interviews on the qualitative/perception questions were conducted with women¹⁷, (aged over 15 years and resident in the settlement). See Plate A1.7, which presents a case study on the participation of women during project consultation. Vulnerable households, as identified by the Muhtar, were also targeted, comprising 50% of the total number of households. For each settlement, households were selected through a combination of three sampling techniques: 1) purposive sampling; 2) systematic random sampling; and 3) quota sampling¹⁸.

A *pilot study* was undertaken to ‘road test’ the effectiveness of the household and settlement level questionnaires prior to settlement level consultation. The study was undertaken in two sample settlements close to Ankara. Following the pilot study, the questionnaires were revised to reflect feedback from the study.

4.4.7.3 Broad Representation Levels

88 pipeline settlements consulted via questionnaires represent

- 35% of the total settlements in the pipeline corridor; and
- 84% of the total population of settlements identified in the pipeline corridor.

4.4.7.4 Approach to Questionnaires

4.4.7.4.1 Pipeline

A total of 88 settlements including eight district centres were surveyed for the pipeline. These settlements were selected for settlement level consultation with representatives participating in the community meetings held in advance of the questionnaires. The household questionnaire was administered to 1,328 households (an average of approximately 10 per settlement) along the pipeline and the settlement level questionnaire to all 88 settlements.

4.4.7.4.2 Marine Terminal

After consultation, the field teams visited all nine settlements selected in the vicinity of the marine terminal development and carried out both settlement level and household level questionnaires, which included specific questions related to fishing activities as a source of

17. The target relates specifically to the qualitative/perception section of the questionnaire and not the quantitative section. It was decided that the household head (usually male) would have better access to the information required in the quantitative section (e.g., income levels, ownership of land, percentage of land under irrigation, input and output costs, main sources of livelihood, etc.). This target did not preclude women from undertaking the full questionnaire, but did ensure that at least 40% of all perception sections administered were answered by female respondents. The qualitative/perception section dealt with issues such as quality of services (e.g., education and health), main settlement problems and attitudes towards the proposed marine terminal.

18. *Purposive sampling*: involves the use of judgement on the part of the researcher, in this case in the determination of vulnerable households, *Systematic Random Sampling*: involves randomly selecting interviewees (households) based on a criteria which does not introduce any biases into the sample, in order to achieve the desired sample size, *Quota Sampling*: aims to obtain a cross-section of the population by setting a quota for number of questionnaires per category identified, for example a target of the number of women to be interviewed.

livelihood and impacts associated with the marine terminal development. A total of 200 questionnaires were administered within the survey area, distributed evenly between the nine settlements. Eight settlement level questionnaires were administered.

4.4.7.4.3 AGIs and Construction Camps

The pipeline and marine terminal surveys enabled sufficient information to be gathered in order to describe the socio-economic baseline conditions of the pipeline. Therefore, the survey for AGIs and construction camps involved administering shortened household and settlement level questionnaires, which focussed on questions that gathered data necessary for understanding the potential impacts of these facilities and construction camps on neighbouring settlements. The settlement level questionnaire was administered in 17 settlements within 5km of the AGIs and with 10 settlements within 2km of construction camps. Local authorities such as governors, sub-governors and mayors administering the provinces or districts in which the proposed facilities and camps are to be located were consulted either in person during the meetings or via telephone with project information and given an opportunity to ask questions or raise issues of concern.

The interviews comprised an introductory explanation of the purpose of the interview and the provision of general project information, followed by a questionnaire that included key socio-economic questions taken from the original settlement level pipeline questionnaire.

4.4.7.4.4 Additional Settlements

Following the initial pipeline consultation and survey activities, a list of 301 settlements whose land is likely to be intersected by the pipeline corridor was prepared¹⁹. Of this total, 72 of the settlements had been consulted previously. The remaining 229 rural settlements were therefore targeted for additional data gathering. Of these, 210 could be reached, with the remainder uncontactable despite numerous attempts. Due to weather conditions (and associated logistical constraints) these activities were conducted by telephone. The socio-economic survey for these settlements targeted the Muhtars or other authorities (e.g., *Imam*, member of the Council of Village Elders, etc.) and was conducted in the form of a shortened, targeted questionnaire (see Appendix A4).

The respondents were given the opportunity to ask questions or provide additional feedback at the conclusion of the questionnaire and were provided with the contact details of project representatives should they have additional queries.

The questionnaires used for the settlement and household level consultations are presented in Appendix A4 of this EIA report. The results of the questionnaires have been systematically documented in the EIA and used to assist the project decision-making process. More detailed information on the methodology and approach taken for the consultation meetings and surveys is provided in Appendix A5 of the EIA report.

19. There are two reasons why this total differs from the initial 248 settlements identified: 1) due to re-routing of the pipeline and thus additional settlements affected and 2) due to settlements outside of the 4km corridor whose land is intersected by the pipeline corridor.

See Plates A1.1 to A1.6, which illustrate consultation meetings and the administration of surveys by the national consultants.



Plate A1.1 National NGO Meeting



Plate A1.2 Local NGO Meeting in Adana

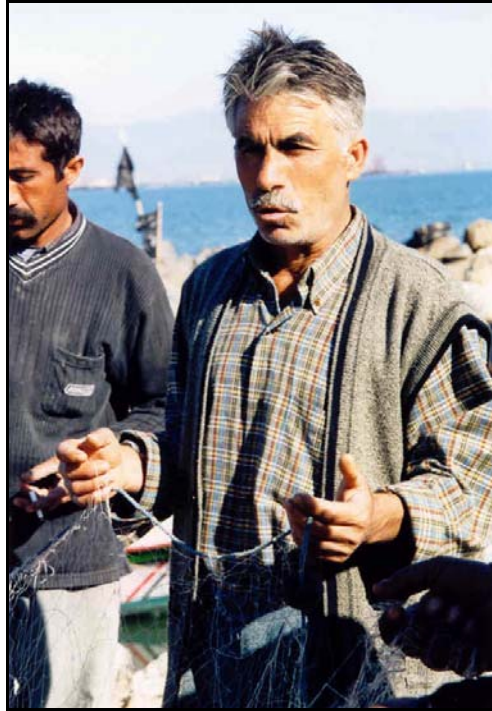


Plate A1.3 Marine Terminal Settlement Level Consultation



Plate A1.4 Women's Consultation Meeting in Osmaniye



Plate A1.5 Consultation Meeting in Gumushane



Plate A1.6 Settlement Level Consultation – Survey Administration in Osmaniye

See Plate A1.7, which presents a case study on the participation of women during project consultation.

Plate A1.7 Case Study on Women's Participation

4.4.8 Consultations Through Various Preparatory Phases of the Land Acquisition Process

At every stage of the Basic and Detailed Engineering work, DSA/BOTAŞ has received a large number of suggestions from local residents to modify the corridor routing and the siting of various permanent project facilities. As described in Chapter 5 of the RAP, DSA/BOTAŞ was able to respond positively to the great majority of these suggestions except in a few cases where they had no factual basis. In addition, DSA/BOTAŞ' contractors specialising in land registration issues worked for a year in the affected areas alongside the project engineering design teams to reduce the pipeline corridor from its initial 10km width to 28m. During this process, they provided feedback to local resident and landowner requests and responded to enquiries on land acquisition matters.

4.4.9 Additional Consultation Activities Carried Out for the RAP

The consultation processes for the EIA clearly pointed to the need to better inform project affected people of the project's policies with respect to land acquisition and resettlement issues. Therefore, a special information package targeted at a local (typically village) audience was prepared to provide details about the basic changes in the Turkish Expropriation Law and its implementation procedures, as well as discussion about the areas of concern that have been identified above. The information package also described the grievance redress mechanism that the project intends to establish.

Since the land acquisition process affects different groups of people, there was a need to reach them all (refer to Chapter 5 of the RAP). Amongst these, the most important groups were:

- Resident land owners with title deeds;
- Individual owners;
- Joint owners with shares registered in the title deed;
- Joint owners without registered shares;
- Resident owners without deed from the land registration office, but with ownership certification from the village officials;²⁰
- Resident owners with customary ownership;
- Ownership contested;
- Ownership not contested;
- Owners whose names and addresses have not yet been identified²¹
- Tenant farmers;
- Sharecroppers;
- Lease holders;
- Individuals with formal or informal tenancy arrangements

20. There are large numbers of owners in this status. Indeed, there are 17 communities directly affected by the project where land consolidation results were not reflected in the land registration system. Rather, these communities still lack a cadastral system. The original shares were certified with letters from the village headmen. In the decades since the consolidation works, land plots have changed hands and the ownership records have not been updated.

21. There are affected land plots with no known absentee or resident owner.

- Absentee land owners;
- Joint owners;
- Users of common property resources;
- Users of pastures;
- Users of forests; and
- Fishermen within the Ceyhan Terminal use restriction area.

Most of the resident landowners are relatively easy to identify and could be reached through the local administrations. The absentee owners were more difficult to identify, but the project made every effort to establish their addresses. This is because the Expropriation Law requires that each owner, including absentee landowners, be contacted and invited for negotiations prior to expropriation (refer to Chapter 2 of the RAP). Thus, the largest groups of the project affected populations were contacted in advance of the expropriation process. The information needs of the local residents, or land users of common property resources, were met through the large number of disclosure documents that were shared with each settlement.

4.4.9.1 Consultation with absentee landowners

To provide information to resident landowners and tenants and to receive feedback from absentee owners, two steps were undertaken in June 2002.

1. The EIA community pamphlet was prepared to address key RAP issues (in addition to environmental and social impacts and mitigation). Copies were mailed to absentee and resident landowners.
2. A short questionnaire with a stamped self-addressed envelope was included among the materials sent to absentee owners, in order to receive additional feedback and to confirm the accuracy of the absentee addresses.

The RAP section of the EIA community pamphlet included detail on the following:

- General elements of the amended Expropriation Law and other changes in the Turkish legal framework;
- The protection of the rights of traditional owners;
- A recognition of problems faced by owners who have not registered their inheritance or sale/purchase records;
- The new valuation procedures and the process of negotiations as an advisable course of action;
- The need for owners to share with tenants compensation received for crops and other joint assets;
- Regulations concerning users of common property resources, including forests and pastures; and
- Grievance procedures.

4.4.9.2 Additional socio-economic survey for the RAP

In addition, a RAP specific socio-economic survey was administered in May 2002 prior to the EIA public disclosure period to landowner/users (refer to Annex 7.4 of the RAP). A separate shortened survey of absentee owners was also carried out as previously mentioned (refer to Annex 7.5 of the RAP). The results of the socio-economic survey of resident and absentee landowners are reported in Chapter 4 of the RAP.

The findings of these surveys highlighted several issues with respect to the familiarity of PAPs to the project and with the relevant legal framework. They have shown that although

many of the residents were informed about the new legal framework during consultation, a great majority of the PAPs knew little about the relevant legal framework. Therefore, the project paid specific attention to informing these people more on land related issues through disclosure materials (community pamphlet) distributed widely and through the consultation meetings held during the disclosure phase of the EIA. The legal framework for land acquisition and compensation was explained by land experts during the community meetings. Furthermore, a “Guide to Land Acquisition and Compensation” (GLAC) was prepared and sent to the directly affected people. GLAC explains the land acquisition and compensation process in detail and contains specific information on entitlements of different categories of affected people. For purposes of disclosure to the farmers, it presents more easily useable information than the formal RAP report.

RAP preparation was based both on direct consultation with above mentioned specific groups of affected people, and with the directly affected public sector institutions. In addition, a consultative joint working structure has been established with a local NGO (Rural and Urban Development Foundation) for valuation determination. At both the provincial and district levels, consultations were held with and information was sought from: Land Registration and Title Deed Offices, branch offices of the Ministry of Agriculture as well as other relevant government departments such as those in charge of forestry. In addition, consultations were held with local judges, and recommendations were sought from lawyers qualified in land acquisition issues both to expedite the process and to help owners/users in resolving issues that might hinder their timely access to compensation payments.²²

4.4.10 Overview of consultation results

The Phase 3 consultation activities yielded feedback on a range of issues associated with the EIA. An overview of the key issues raised during this round of consultation is provided below and originated from a range of stakeholders included local residents, State authorities, NGOs, etc. As outlined above, the comments received from consultation was fed into the consultation tracker, however it should be noted that the following summary was prepared on the basis of a review of qualitative output generated by the tracker in addition to a detailed examination of reports and meeting minutes prepared from the consultation meetings held at the settlement, province and national level. This feedback, in addition to field studies, questionnaires and additional meetings with key stakeholders formed the basis of the development of mitigation measures and management plans for the EIA report.

Environmental

- Damage to environmental resources (e.g., marine ecology, water resources, habitats);
- Potential impacts on flora and fauna;
- Risk of oil spills, leakages or explosions along the pipeline and at the marine terminal; and
- Earthquake, landslide and other geohazard damage to the pipeline.

Employment

- Nature and extent of employment opportunities associated with the project;

22. For instance, joint owners may each be financially hurt if they cannot motivate each other to come forward for negotiations or give a power of attorney to one of the owners to represent the group. If this is not done in situations where the individual shares of each of the owners are not registered in the title deed, there would be delay in the ability of all to receive the compensation payments deposited in a custody account. Similarly, the ability of an owner(s) to negotiate with DSA/BOTAŞ may pose problems. If, on the other hand, the individual shares of each of the joint owners are registered in the title of the land plot, DSA/BOTAŞ can pay the warranted compensation to each owner.

- Priority recruitment of project affected settlements including preference for Turkish workers and skills development and training;
- The need for a fair and equitable recruitment process which is not susceptible to corruption or bias and is overseen by an independent third party; and
- Suggestions as to how the recruitment process should be managed.

Land Acquisition and Compensation

- A fair and transparent land acquisition process;
- Sufficient information about the process and how it would work;
- A fair and equitable compensation process for damage to buildings and agricultural infrastructure as a result of construction activities (irrigation system, drainage, etc.);
- Timely payments of compensation;
- Independent arbitrators for dealing with complaints;
- Concerns about the lack of legal title to land being used, and thus fear that entitlements to land may not be recognised;
- Concerns about the valuation of different qualities of land/assets to be expropriated; and
- Impacts on livelihoods as a result of land acquisition and damages to assets.

Safety, Security and Health

- The integrity of the pipeline and whether or not settlements would be in danger from its proximity;
- Injury to local residents during construction;
- Injury to animals on the right-of-way during construction;
- The need for adequate security measures to protect the pipeline and nearby settlements;
- Health impacts to settlements from pipeline construction; and
- Increased traffic on local roads.

Reinstatement, Infrastructure and Agricultural Activities

- Degradation of roads and irrigation channels during construction;
- Reinstatement of infrastructure such as roads to pre-construction levels;
- Maintained access to grazing lands at all times and locations for animal crossings;
- Mitigation of impacts on agricultural activities such as bee keeping and animal husbandry; and
- Mitigation / minimization of construction impacts such as traffic, dust and noise.

Marine Terminal

- Impact on livelihoods particularly fishing;
- Restrictions on fishing activities near existing marine terminal;
- Impact on quality of environment (e.g., air pollution, marine ecology);
- Permanent employment opportunities during construction and operation;
- Decreased suitability of the project area for tourism activities; and
- In-migration of job-sectors and increased pressure on existing services.

Construction Camps

- Direct or indirect economic benefits;
 - Potential employment opportunities;
 - Supply of local goods and services to camps;
-

- Potential increases in noise, traffic and dust;
- Disruption to social harmony of nearby settlements;
- Increased crime associated with construction workers; and
- Damage to roads by construction machinery.

Above Ground Installations (AGIs)

- Loss of communal pasture land;
- Impacts on water resources;
- Appropriate compensation and timely payment;
- Employment opportunities at facilities;
- Impacts from construction camps for AGIs;
- Security of facilities;
- Increased traffic, visual impacts and damage to infrastructure; and
- Disturbance to social harmony.

4.4.11 Interaction with project design

The design engineering and EIA teams have interacted closely throughout the development of the project, particularly in key areas such as the identification of environmental and social constraints and determining the pipeline route, selecting the sites for the marine terminal and AGIs, undertaking environmental risk assessments and developing land reinstatement measures. This has enabled the majority of impacts of concern to be designed out of the project or be reduced to an acceptable level.

In the course of Detailed Engineering there have been numerous route modifications influenced by both environmental and social considerations. Ongoing consultation has enabled the pipeline design to be routed away from sensitive cultural sites such as cemeteries, residential areas, planned development areas and ecologically sensitive areas.

The EIA and design engineering teams also worked closely together to identify and assess alternative locations for Above Ground Installations such as pump stations, the pressure reduction station and block valve stations, as well as the temporary construction camp locations and access roads, following feedback from consultation.

In addition, the local officers from DSA provided feedback about the locations of social and physical constraints to the engineering and EIA teams during the data collection process for the land surveys.

4.5 PHASE 4: DEVELOPMENT OF MITIGATION MEASURES

4.5.1 Introduction

Based on the SIA and EIA data gathering, and on the national and local consultation activities, the EIA and SIA consultants worked with BTC Co. and BOTAŞ to develop appropriate mitigation measures for the environmental and socio-economic issues identified.

To meet this objective, several meetings were held to reality test specific mitigation measures with a number of key stakeholders. The aim of the meetings was to ensure that mitigation measures are locally appropriate to Turkey and have buy-in and support from stakeholders.

Several meetings were held with the relevant state authorities such as ORKOY, Ministry of Forestry, and State Hydraulic Works (DSI) to discuss land issues and to establish appropriate mitigation measures to be addressed in the RAP.

Five focussed meetings were held in Ankara to discuss the proposed mitigation measures relating to employment, pollution prevention, community relations, geological issues and health. The following stakeholders participated in discussion on the proposed employment and community relations strategy:

- DSI (State Hydraulic Affairs) Rural and Urban Development Foundation;
- United Nations Development Programme (UNDP); and
- Development Foundation of Turkey (TKV).

A meeting to discuss the proposed employment strategy was held with the state employment agency, (Turkish Employment Agency) and health issues were discussed with representatives from the Turkish Medical Association.

Attendees at the pollution prevention meeting included:

- Hacettepe University, Department of Environmental Engineering;
- Chamber of Environmental Engineering;
- Ministry of Environment;
- Undersecretariat of Maritime Affairs; and
- Turkish World Life.

Attendees at the meeting on geological issues included:

- Chamber of Geologists;
- Middle East Technical University Geology Department;
- Hacettepe University Geology Department;
- Chamber of Civil Engineering; and
- MTA.

The consultants (national and international) and representatives from BTC Co. and BOTAŞ facilitated the workshops with the aim of exploring and refining mitigation measures to ensure that they are appropriate to the local context.

4.6 PHASE 5: DISCLOSURE OF DRAFT EIA AND PUBLIC 'ROAD SHOW' ALONG THE CORRIDOR

4.6.1 Summary of disclosure process

Following the publication of the Draft EIA for Disclosure on the 24th of June 2002, a disclosure period of just over 60 days (until 31 August 2002) has taken place in accordance with both international EIA standards and the HGA. The objective of the disclosure process was to solicit feedback from project affected settlements and interested stakeholders on the project impacts and proposed mitigation actions, and where required make the necessary changes to the EIA and to the land acquisition process to reflect comments received. Within the disclosure period, a formal public consultation process was conducted along the entire pipeline route. This was carried out by the BTC Project team working alongside the independent environmental and social consultants.

The main steps of the disclosure process were as follows and are explained in more detail below:

- Preparation and distribution of disclosure materials;
- Announcements and engagement of the media;
- Disclosure meetings; and
- Collection and incorporation of comments and feedback.

4.6.2 Disclosure documentation

4.6.2.1 Preparation and distribution of disclosure materials

Approximately 95 complete copies of the draft EIA (including appendices), were made available in Turkish and an additional 10 in English prior to the disclosure period to the following organisations and public locations:

- International Finance Institutions;
- BTC Project office in Ankara;
- State authorities (i.e., government bodies);
- 10 provincial governorship offices;
- 35 district governorship offices;
- 10 national university libraries;
- 3 national public libraries; and
- 6 local university libraries.

Over 600 electronic copies of the draft EIA (on CD ROM) were sent to interested stakeholders such as State authorities, national NGOs, interest groups and media.

The Non Technical Summary (NTS) was distributed with the draft EIA report to those stakeholders mentioned above (including electronic copies) and to the following organisations and public locations:

- National NGOs and interest groups (1,000);
- National media (300);
- Local NGOs and interest groups (1,250);
- Public libraries in the provincial and district centres (3,500);
- Muhtars (6,300)²³; and
- Project affected settlements (1,100).

In addition, the draft EIA and NTS in Turkish and English were posted on the project Internet website: www.caspiandevlopmentandexport.com.

Community information pamphlets, which included information on land acquisition and environmental and social impacts and mitigation, were distributed to all project affected settlements along the pipeline route prior to and during the community level meetings (approximately 21,300 copies). They were also distributed to interested national (500 copies) and local (500 copies) NGOs and absentee landowners (500 copies). Appendix A7 provides the English language equivalent of the Community Pamphlet distributed during disclosure.

23. There are approximately 326 Muhtars within the 4 km consultation corridor.

All disclosure documentation was distributed to the relevant stakeholders approximately one week prior to the commencement of the official disclosure period, and at least two weeks prior to the disclosure meetings, thus ensuring stakeholders had sufficient time to review the documentation prior to the meetings. Due to a high level of interest in project documentation additional copies of the NTS and Community Pamphlet were distributed by field teams prior to the meetings and during the meetings. Plates A1.8 and A1.9 illustrate the distribution of disclosure documents at the community level.



Plate A1.8 Review of Disclosure Documentation in Kayseri



Plate A1.9 Receipt of Disclosure Documentation in Sivas



Plate A1.10 Review of Disclosure Documentation in Sivas

4.6.2.2 Announcements and engagement of the media

Announcements of the availability of the draft EIA Report and associated disclosure meetings were made through the two most widely circulated national newspapers and 20 local newspapers. Other key national and local media sources (television and radio) also provided media coverage on the disclosure activities. Local channels of communication within the villages such as announcements from the mosques, notice boards in coffee houses, etc were also used. Separate media meetings were also held and are explained below.

4.6.2.3 Disclosure meetings

A series of disclosure meetings were convened during July and August to ensure that all interested stakeholders had the opportunity to access and comment on the draft EIA Report. The main objectives of these meetings were to:

- Provide information on potential environmental and social impacts and present the final range of proposed mitigation measures;
- Provide information on potential impacts that are likely to result from the land acquisition process and provide an overview of the RAP and associated compensation and proposed mitigation measures;
- Solicit feedback on proposed mitigation measures;
- Provide an opportunity for involvement in the consultation process; and
- Raise awareness of the project.

To meet the above objectives, the following consultation activities were undertaken:

- National media meeting in Istanbul;
- Meetings with national/international NGOs/organisations and other interest groups in Istanbul and Ankara;
- Working group and individual meetings with State authorities (government bodies) in Ankara;

- Meetings with local NGOs, media local authorities (governors and sub-governors) and other local interest groups at each of the ten provinces through which the pipeline pass and marine terminal is situated. A separate media meeting was held in Adana province; and
- Community ‘road show’ meetings at a range of locations along the pipeline. These included the attendance of local residents and both elected and appointed authorities and leaders such as Muhtars, teachers, Imams and representatives of the Council of Village Elders.

At all disclosure meetings, a presentation of the project, the draft EIA report findings and issues related to land acquisition and compensation procedures, with reference to the RAP, was made. The land related presentation included an overview of the difference between the Turkish Expropriation Law and the O.D. 4:30 requirements. The presentation was followed by an open-ended question and answer feedback session. Key representatives from BTC Co. and BOTAŞ/DSA land experts were present at all meetings and were supported by experts from the project team, international consultants ERM and specialists from KORA (Middle East Technical University) and ENVY. Additional information was also provided via provision of the NTS, Community Pamphlets, and display boards or exhibition panels. All comments received were recorded through official minutes and feedback forms.

A video camera was used to record the National NGO and media meetings and Local NGO meetings. A photographic record of all meetings held with project affected settlements, local NGOs and interest groups and national NGOs and media was kept. See Plates A1.10 to A1.17, which document a number of the disclosure meetings.

National media, NGO and interest group meetings

The national media meeting was held in Istanbul on 8th July, with attendance of 42 representatives from 33 different media organisations (from TV, newspapers and magazines etc.).

The national NGO and interest group meeting in Istanbul was held on 9th July, with 40 representatives from almost 30 organisations attending. A similar meeting was held in Ankara on 11th July 2002 at which 84 representatives from 54 different organisations attended, including amongst others media, labour unions and international development organisations.

The presentation format of these meetings comprised a formal presentation of the project description, an update on project schedule and disclosure activities and an outline of the main findings of the draft EIA including key social and environmental impacts and associated mitigation measures. Following the formal presentation, a question and answer session was held enabling attendees to direct specific questions to experts present at the meetings.

On going disclosure meetings were held with national NGOs (WWF, TUDAV, CEKUL) to ensure feedback was provided in response to comments made during official disclosure meetings.



Plate A1.11 National Media Meeting

Local authority meetings

Governors of the ten provinces along the pipeline route were visited from 15th to 27th July 2002. The EIA findings, in addition to an explanation on the land acquisition and compensation process were described to the local authorities including governors, Provincial Directorates of Ministry of Forestry, Ministry of Agriculture, Ministry of Culture, Ministry of Environment and mayors.

Local NGO, interest group and media meetings

Eleven meetings for local NGOs, interest groups and the media were held in each of the ten pipeline provinces over a period of two weeks from 15th to 28th July. Representatives from various local NGOs, interest groups, business associations, chambers of commerce, academics and media attended these meetings. In addition, various local authorities including the provincial directorates of State authorities such as the Ministry of Culture attended the local NGO meetings. On average, levels of participation were between 20–50 participants at each meeting. The total number of participants that attended the eleven meetings was 325. The EIA findings, in addition to an explanation on the land acquisition and compensation process were presented at the local NGO and media meetings. The primary aim of inviting the local media to these provincial meetings was to deliver project information to as many people as possible through the support of those media organisations, which are widely active along the pipeline route.



Plate A1.12 Local NGO Meeting in Ardahan



Plate A1.13 Local Authorities in Erzurum

State authority meetings

A series of working group and individual one-to-one meetings (two general and eleven individual meetings) with State authorities (government bodies) were held throughout the disclosure period. These groups included the Ministry of Environment, Culture, Forestry, Public Works and Settlement, Transportation, Maritime Affairs, Highways, Agriculture, Health, Tourism, and Energy and Natural Resources and associated departments²⁴. The purpose of these meetings, in addition to informing the relevant authorities of the results of the draft EIA, was to enable open discussion and dialogue on specific areas of interest prior to submission of the final EIA for approval by the Ministry of Environment.

Regular meetings have been held with the Turkish Ministry of Environment to update them on progress throughout the whole EIA process.

Community meetings

During mid July to early August, a 'community road show' was undertaken. This was comprised of two main components: formally organised meetings held at 36 settlement locations along the entire length of the pipeline, and the distribution of Community Pamphlets in Turkish to all known project affected communities. Participation levels at the community meetings were generally high as a result of neighbouring project affected settlements attending many meetings.

Community meetings were held in 36 project affected settlements, however due to separate men's and women's meetings being held in a number of settlements, the total number of meetings increased to almost 50. Some representatives from a further approximately 75 neighbouring settlements attended these meetings therefore of the total 326 project affected settlements, representatives from 111 settlements accessed the disclosure meetings.

Public disclosure at the marine terminal area was not held during the official disclosure period, as additional studies were being undertaken to further investigate potential impacts on fishermen, therefore the decision was taken to postpone disclosure meetings in that area until such studies had been finalised. The additional studies were completed in early September and are undergoing final review. Disclosure of the results will follow for settlements in the vicinity of the proposed BTC Marine Terminal in addition to residents living within the existing BOTAŞ Marine Terminal.

It is important to note that although formal meetings were not held, these communities were sent the relevant disclosure documentation, i.e., NTS and the Community Pamphlet. They also had access to the full draft EIA – from various named sources and also had the opportunity to comment on the draft EIA via free phone, mail, fax, Internet and feedback forms.

The field teams comprised an organisational and meeting team. Representatives from Veri Arastirma formed the *organisation team*. They were responsible for:

- Arranging the time and venue for the meeting in advance of the meeting;

24. General Directorate of Mineral Research and Exploration, General Directorate of Rural Services, Ministry of Environment/Department of Waste Management, Ministry of Environment/General Directorate of Environmental Impact Assessment and Planning, Ministry of Public Works and Settlement / General Directorate of Technical Research and Application, Ministry of Transportation / General Directorate of Railways, Harbours and Airports Construction Undersecretariat of Maritime Affairs, Ministry of Environment/General Directorate of Environmental Impact Assessment and Planning, Ministry of Energy and Natural Resources / General Directorate of State, Hydraulic Works, Ministry of Public Works and Settlement / General Directorate of Highways.

- Distributing additional disclosure documents to residents;
- Publicising the meeting to neighbouring settlements and inviting them to the meeting; and
- Setting up the meeting on the day.

These representatives were both male and female and were selected to liaise with the local residents based on their previous experience with the project and familiarity with the regions being visited. Two separate field teams were established to undertake the meetings along the entire pipeline route, and were divided into a northern region and southern region group. This assisted in enabling the completion of the meetings within the specified 60 day disclosure period.

The *meeting team* was led by a trained facilitator from KORA (Middle East Technical University) and comprised representatives from BOTAŞ (Land Affairs, Environment and Community Relations departments), Designated State Authority (DSA) regional representatives (responsible for land acquisition), with additional technical support provided by representatives of BTC Co. and international consultants, ERM. Each *meeting team* also had a minimum of three minute takers to ensure that each session was recorded accurately. These representatives were both female and male – in particular to ensure the participation of women in more traditional and/or conservative areas.

The presentations included an outline of the purpose of the meeting, a brief description of the project and a summary of the timing and nature of construction activities. General environmental and social impacts, both positive and negative, were then explained, with an emphasis on provision of site-specific information on impacts and associated mitigation measures. The land acquisition and compensation procedure was presented, in addition to an outline of the project's community relations programme and complaints procedures. Employment and hiring practices were also explained, with an emphasis of the temporary nature of construction work and the limited job opportunities from the project. Participants were then informed of the various mechanisms for providing feedback on the project, which led into an open-ended question and answer session.

Prior to the community meetings, the local DSA officers together with members of the meeting team prepared settlement specific information for each meeting location and for neighbouring settlements to ensure specific information regarding the legal status of the land, classifications of the land, number of plots to be acquired, names of the landowners and users could be provided to local residents.

On several occasions after the community meetings were held, the local DSA officers undertook site visits to the land of local residents in order to understand the nature and extent of their concerns or queries, to clarify any misunderstandings or misinterpretations of information and to give appropriate answers to the questions raised specific to those villages.

An objective of the project's public consultation and disclosure programme is to proactively undertake a "non-discriminatory approach" in attempting to reach as many people as possible. By using various methods of consultation such as the distribution of written information, announcements and public meetings, together with a clear feedback mechanism allowing all stakeholders to submit their comments to the project regardless of their ethnic, religious or gender differences this objective was achieved.

To ensure that all project-affected residents had equal opportunity to receive project information, raise concerns or make verbal or written comments, a number of approaches were taken. The project also made a concerted effort to proactively engage project affected people in disclosure meetings. The various methods used and approaches taken included:

- Public announcements made at every settlement, most commonly through the mosque loudspeaker, to ensure that all project affected people were well informed of the details of the proposed meeting, and to provide the opportunity for all interested residents to attend the meeting regardless of their gender, age, ethnicity or religious background etc. In addition to public announcements, the organisation team went from door-to-door to personally invite individual residents and encourage them to attend and participate. In some cases where houses were located some distance from the meeting location, residents were provided with transportation to attend the meetings;
- Holding separate women's meetings, either at a separate time and place to the men's meeting, in parallel with the men's meeting, or through private visits to individuals homes (facilitated by female members of the meeting team);
- Allowing meeting participants to make comments formally during the meeting or informally on a one-to-one basis following the meeting;
- Ensuring participants had opportunities to record their concerns in writing;
- Ensuring participants who were unable to read or write had the opportunity to listen to presentations and verbally reflect their concerns to minute takers (either during or after the meetings);
- Simplifying the language used during the meeting presentations and question and answer sessions to avoid misunderstanding or lack of understanding through the use of complicated or technical jargon;
- Special effort was focussed on women attending the meetings to ensure that they also understood the project information delivered and to ensure that their concerns (some of which differed to those of men's) were also addressed;
- Meetings were designed to encourage open discussions with project affected people rather than being dominated by a lecture format;
- The meeting team tried to keep the presentations brief in order to allow more time for open-ended "Questions and Answers" sessions. In several cases, after the Question's and Answer's session, the meeting team spent more time with individuals who wanted to discuss some issues in more detail in a more informal environment;
- Where possible, the project meeting teams spent time with the communities to continue dialogue after the more formal meetings and attempted to answer all questions before leaving;
- Ensuring project affected settlements had the opportunity to access and attend the meetings regardless of their ethnicity, religion, gender, etc.;
- A logistics feasibility study was undertaken prior to the commencement of disclosure to investigate the extent to which local agricultural activities such as harvesting and the timing of local events (e.g., weddings, market days and religious festivals), would affect participation at the meetings. The outcomes of this study informed the development of the programme for public disclosure activities; and
- All Muhtars were called several times during the disclosure process to request that they collect feedback forms from local residents and send them to the project. These follow up calls ensured that those settlements, which were not visited, also had the opportunity to submit their comments to the project.

The meetings were typically held at the local school, mosque, coffee house or outdoors in a centrally accessible location determined by the villagers themselves. Use was made of display boards and exhibition panels with maps showing the route of the pipeline and key environmental or social aspects of the project to graphically illustrate important messages during the meetings.

Cultural differences and varying levels of conservatism, particularly in some of the northern provinces, inhibited the receipt of extensive verbal feedback during some meetings. Despite proactive efforts to engage with local residents and encourage open participation, in some instances participants preferred to simply listen to the presentations, record their concerns in writing, express their concerns following the meetings in a more informal manner or use the mechanisms outlined for additional feedback should they have any.

Additional meetings are being held with residents in Akpınar settlement, in Sivas and Sogutlukaya settlement in Ardahan, following the formal disclosure meetings in order to further investigate site specific concerns raised during consultation. At Akpınar settlement, substantial concerns were raised regarding the routing of the pipeline, so revisits to the settlement are currently being undertaken (see Appendix A8 for more information). Due to concerns raised by residents near Pump Station 1 (PT1) in Posof, Ardahan, additional site visits are also being undertaken during September 2002. The results of this visit have been incorporated into Sections 7 and 15 of the EIA report.

Additional discussions will be held in the coming months with local residents in the vicinity of the proposed BTC Marine Terminal including with local fishermen to discuss potential compensation measures associated with the construction of the marine terminal and subsequent reduction in fishing grounds.



Plate A1.14 Community Meeting in Sivas



Plate A1.15 Community Meeting in Ardahan



Plate A1.16 Community Meeting in Kars



Plate A1.17 Community Meeting in Erzincan

4.6.2.4 Criteria for determination of disclosure meeting locations

The methodology for determining appropriate locations for the disclosure meetings was based on previous consultation experience undertaken for the project and in the case of the community meetings on a number of other criteria.

Previous consultation activities undertaken towards the end of 2001 indicated that convening formal meetings with national NGOs, media and interest groups in Istanbul and Ankara and meetings with stakeholders in each of the ten provincial centres was an effective approach to ensuring the participation of those stakeholders.

The methodology applied in the selection of sites in which the community level disclosure meetings were held was based on environmental, social and other important criteria. A clustering exercise was undertaken in order to determine the most appropriate locations for these meetings based on these criteria. It should be noted that the following list of criteria does not imply that settlements selected for community level meetings fulfilled all of the following criteria, rather for a majority of settlements, a number of the selection criteria were met.

The **social criteria** for settlement selection included:

- Close proximity to the BTC Pipeline;
- Close proximity to the five AGIs and associated construction camps;
- A high number of land parcels to be expropriated;
- Those with particularly complex land acquisition related concerns, such as forest areas;
- Close proximity to the three primary construction camps;
- Close proximity to both the East Anatolian Natural Gas Pipeline and BTC Pipeline;
- Settlements not previously consulted or those only consulted via telephone during previous consultations;
- Variations in population size; and
- Close proximity to neighbouring settlements and therefore ability to be clustered.

The **environmental criteria** for settlement selection included:

- Presence of environmentally sensitive areas, such as Posof Wildlife Protection Area in Ardahan;
- Presence of archaeological or culturally significant sites;
- Sites of river crossings or major geological formations in close proximity to the pipeline route;
- Sites where temporary short term impacts such as dust, noise and traffic may occur, for example AGIs; and
- Sites where visual impacts may be experienced.

The **general criteria** for settlement selection included:

- Even geographical spread of meeting sites along the length of the pipeline route; and
- Accessibility for logistical reasons.

A logistics feasibility study was undertaken prior to the commencement of disclosure to ensure that additional criteria were considered in the planning of the meetings. This exercise aimed to investigate the extent to which local agricultural activities such as harvesting and the

timing of local events (e.g., weddings, market days and religious festivals) would affect participation at the meetings and the need for separate women's meetings to be arranged. Health and safety, accessibility, weather/climate, transportation and communication issues were also examined in this exercise prior to the commencement of the fieldwork. The outcomes of the study formed the basis of disclosure activities.

4.6.2.5 Collection of comments/feedback

In addition to public meetings, comments / queries / concerns raised in relation to the draft EIA have been received via:

- **Feedback forms**, which were distributed to project-affected settlements and other key stakeholders in advance of the disclosure meetings, and which were also available in Turkish at locations housing the draft EIA report. These forms could either be:
 - handed in to the field teams prior to, during or after the disclosure meetings;
 - mailed directly to the BTC Co. Project office in Ankara; or
 - handed to local authorities such as Muhtars who had been provided with pre-paid addressed envelopes to return the forms to the project office on the residents' behalf;
- The feedback page on the **Internet site**;
- Free **telephone hotline**; and
- The provision of the project postal address, fax number and additional contact names and telephone numbers on project documentation such as the NTS and Community Pamphlet.

Comments and feedback from disclosure were collected from the sources outlined above and through the official recording of minutes during all meetings. A photographic record of all meetings was also kept. All feedback was sent to a central location within the project office, where it was collated, translated and inputted into the consultation tracker database.

The consultation tracker database has been used by the environmental and social consultants to revise the EIA based on feedback from disclosure. An outline of how the tracker has been used during disclosure is provided below.

The purpose of this database was to record all comments received during disclosure and to code them according to the issues that were raised within the comments. The project team identified the predominant issues based upon an initial review of the disclosure comments and from experience gained during the consultation phase of EIA. During the disclosure of the EIA, with project affected people along the pipeline route, issues of land and asset acquisition and procedures for compensation were among the most frequently mentioned. People expressed their concern about the complexities of the general principles of land acquisition and legal framework to be used for land acquisition and compensation. The issues were identified as follows:

Social

- Land use;
- Land reinstatement;
- Land acquisition;
- Compensation;
- Health and safety;
- Construction camps and community relations;

- Employment, livelihoods and recruitment;
- Investment programmes;
- Infrastructure and services; and
- Project background.

Environmental

- Pollution prevention and risk assessment;
- Archaeology, local heritage and culture;
- Emissions;
- Marine resources/fisheries; and
- River crossings.

These categories were then differentiated into additional sub-categories (approximately 90), which were developed and refined through an iterative process as the meeting minutes and feedback forms were collated during disclosure. Meeting minutes and feedback forms were initially recorded in Turkish and translated into English.

The comments were coded manually and then entered into the consultation tracker database, making note of (where relevant) the name of the person who supplied the comment, the settlement name, telephone number, province, date, the type of consultee/stakeholder, the form of feedback (if a meeting, telephone call etc), whether the comment was social or environmental and lastly whether the comment required a response or action from the social or environmental team.

During the analysis of the comments the database was used to sort and filter the data according to the:

- Type of consultee or stakeholder;
- Province;
- Issue(s) raised;
- Form of consultation feedback (whether at a national NGO meeting, community meeting, etc.); and
- Whether the comment was social or environmental.

The database allowed searches to be conducted by issue type, province and form of consultation undertaken. The results of these searches enabled summary reports to be printed and issues to be analysed. An overview of the issues raised during disclosure is provided in Appendix A8 of the EIA, however additional data from the consultation tracking database is available on request from the BTC Co. office in Ankara. An overview of the procedure for comments received during disclosure is provided in Figure A1.3 below.

**BTC PROJECT EIA
TURKEY
FINAL EIA**

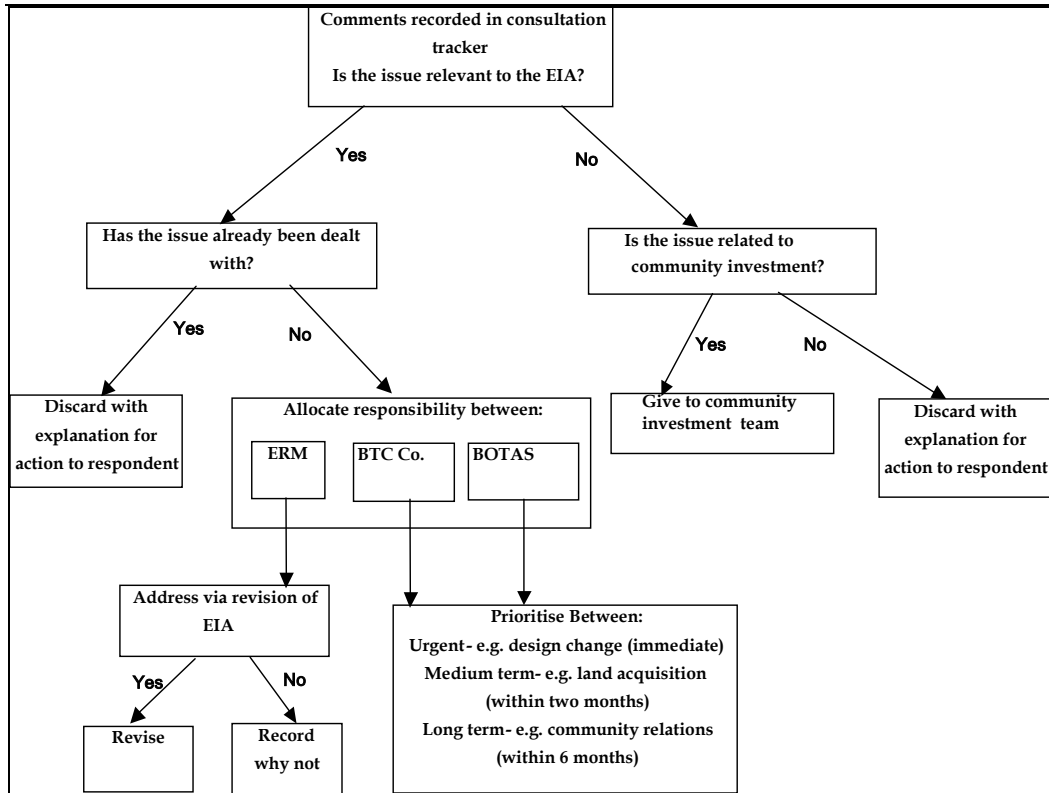


Figure A1.2 Procedure for Comments Received During Disclosure

4.6.2.6 Incorporation of Comments/Feedback

In reference to Figure A1.3, the process undertaken in handling all comments, queries or concerns raised during the official disclosure period was to have them reviewed by the project (BTC Co. and BOTAS) and international consultants, ERM and where necessary provide responses or take actions in order to address issues raised by project stakeholders. Amendments (e.g., modifications, information additions or clarifications) were typically made to the EIA report in response to comments or queries made regarding a specific methodology or approach taken in the EIA.

A detailed examination of comments received or issues raised during disclosure from all sources is provided in Appendix A8 of the EIA. That Appendix reviews the feedback received during disclosure in relation to a broad range of environmental and social issues and includes tabulated responses to feedback received from various State authorities, national NGOs, media and interest groups, local NGOs and the International Fact Finding Mission report. Appendix A8 provides an outline of the major changes made to the EIA and comprises project responses in relation to comments received on the following categories:

- General project background;
- Social issues;
- Environmental issues;
- Monitoring and implementation;
- Investment programmes.

A large proportion of the responses provided and outlined in Appendix A8, are considered closed (i.e., have been addressed by the project) in that the relevant comment received on the EIA has been addressed and responded to officially. Of those that remain open (i.e., still

being addressed by the project), such as the determination of mechanisms for compensation of fishermen in the vicinity of the marine terminal, dialogue with key stakeholders is continuing. The outcome of further discussions will be disclosed by the project once completed.

Where specific comments were not addressed in the revised EIA, an explanation was provided to the relevant stakeholder either during a disclosure meeting or following the meetings and a summary response provided in Appendix A8. For specific comments or queries raised in relation to project activities such as land acquisition and detail regarding community investment programmes, the impetus was placed on BTC Co. and BOTAS for action and response to stakeholders, where required.

4.7 PUBLIC RESPONSE TO THE DRAFT EIA

This section provides an overview of the nature and extent of comments received during the disclosure period. Specifically, it analyses how the comments were received (i.e., the response vehicle) and the proportion of comments relating to either environmental, social or project issues. A summary of the specific issues raised by the different stakeholder groups such as local NGOs and interest groups, State authorities, national NGOs and interest groups and communities is also provided in this section in the context of output produced from the consultation tracker.

4.7.1 Response vehicle

By 31st August, at the end of the disclosure period, 1,652 comments had been recorded in the consultation tracking database provides a breakdown of how disclosure comments were received throughout the 60-day period. As outlined in Section 4.6.2.5, the main consultation vehicles for soliciting comments on the EIA and project were: 1) public meetings, 2) feedback forms, 3) letters, 4) emails, 5) calls made to the free telephone hotline number and 6) internet feedback. The majority of feedback was received during the formal disclosure meetings (910 comments) and through the feedback forms (686 comments) received by post or handed to project representatives at the meetings, with a small proportion in the form of letters (36 comments) and email to project representatives (11 comments). Refer to Figure A1.3 which details the response vehicles.

Formal, written responses to the draft EIA were also received from various State authorities and national NGOs/interest groups. BTC Co. and BOTAŞ acknowledge and appreciate the effort that went into producing these detailed responses. Summaries of these written responses are provided in Appendix A8. In addition, upon request to BTC Co. and BOTAŞ in Turkey, individuals and organisations are able to access the project's Consultation Tracking Database, which contains all comments received.

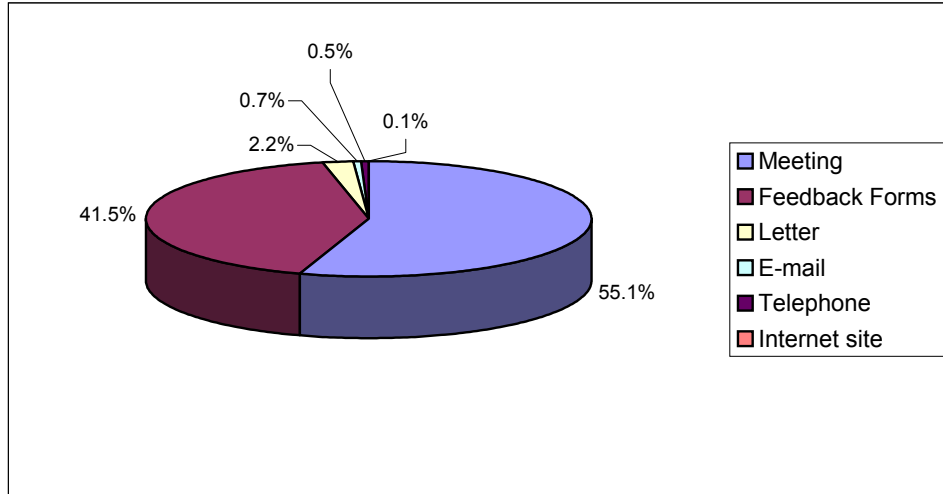


Figure A1.3 Response Vehicle

These figures reflect more the concerns of project affected people from settlements along the pipeline route than any of the other stakeholder groups, and should therefore be viewed in this context

4.7.2 Response topic area

Of the 1,652 comments received by the end of August, 5% broadly relate to environmental issues, 72% to social or socio-economic issues and 23% to the BTC Project itself (see Figure A4.5). It should be noted, however, that not all disclosure comments are easily differentiated into one or the other of these three broad categories. In cases of ambiguity, categorisation followed the divisions used in the consultation tracker (see Section 4.6.2.5). Land related issues such as land acquisition and compensation procedures have been categorised within the 'social' / 'socio-economic' issues grouping and in general comprise the most commonly raised issue from the disclosure period.

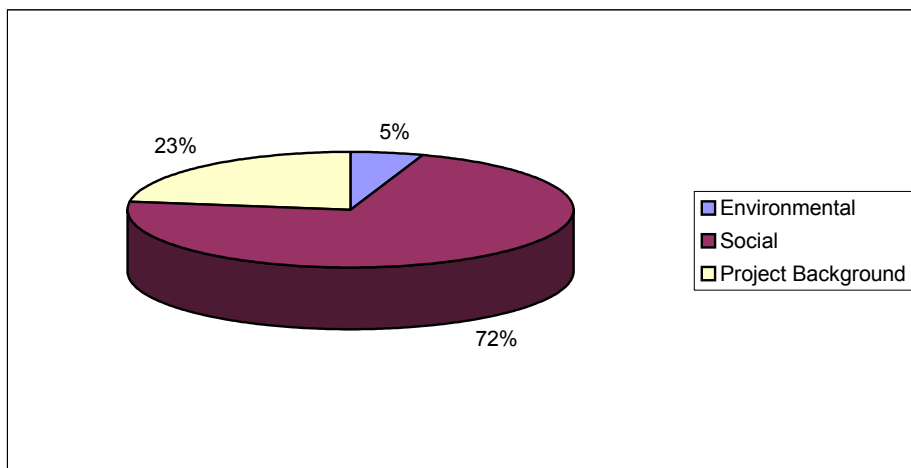


Figure A1.4 Responses by Topic Area

4.7.3 Key Issues

A large proportion of comments from all stakeholder groups comprised requests for clarification of proposed mitigation and management measures outlined in the draft EIA report. Of all comments received during disclosure, the largest proportion relate to the issue of land acquisition and compensation including but not limited to the following sub-issues, which were notably important to local communities:

- Timing and extent of land acquisition;
- Fair and transparent determination of prices for land and assets;
- Procedures for inherited land;
- Procedures for lands without registered title deeds;
- Concern about fragmentation of land from pipeline intersection;
- Procedures for landusers versus landowners;
- Ability to re-use the land following acquisition and construction;
- Negotiation and court process for gaining agreement on prices;
- Crops compensation and implications of acquisition on harvests;
- Payments for pasture lands (*meras*); and
- Process for land without cadastral surveys.

The second largest number of comments received, are associated with project background – including questions and comments on expected benefits of the project for Turkey as a whole but also at the micro level - and comments on the consultation process.

10% of all comments received relate to employment opportunities, potential impacts on livelihoods and recruitment of workers – an issue raised by all stakeholders but particularly by a number of national NGOs/interest groups and by communities; 9% of comments received relate to construction camps and community relations – an issue raised by communities in all provinces and NGO/ media groups in Ankara; and 8% related to land reinstatement. The latter issue was more commonly raised by communities in provinces with previous pipeline experience. Finally, environmental issues (for example emissions, river crossings, pollution prevention) were associated with less than 5% of all comments raised. Again, this should be viewed in the content of a greater number of responses being received from the local level, in particular through the comments and queries made at the community meetings and the feedback forms submitted.

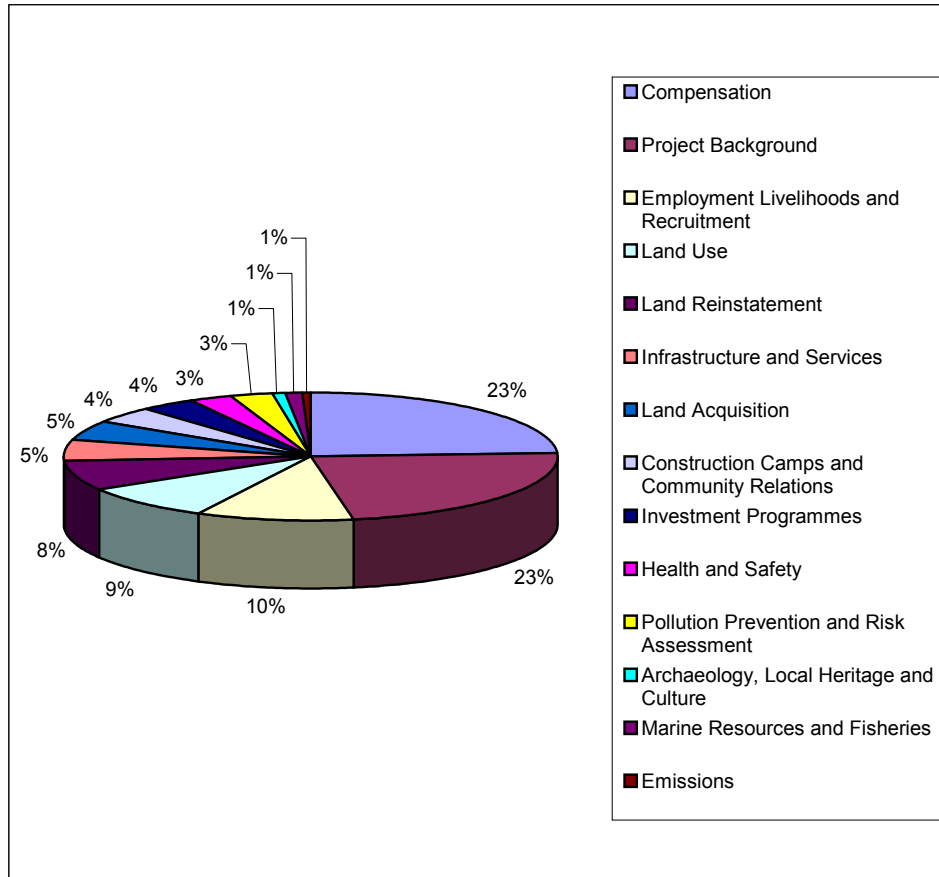


Figure A1.6: Percentage of Comments Raised per Issue

4.7.4 Ranking of environmental comments

4.7.4.1 Overall comments

Although the proportion of comments relating to the natural environment was substantially lower than socio-economic/land acquisition related comments, stakeholders raised a number of issues. Of these, the majority of environmental comments received relate to pollution prevention (such as waste management and air quality impacts) and risk assessment (see Figure A1.6). For example, a number of respondents are concerned about the proposed oil spill response. Others are concerned about geohazards, particularly local NGOs/interest groups and national NGOs/interest groups. In addition, a number of respondents raised issues relating to archaeology and local heritage – also commonly raised by local NGOs/interest groups and also by various State authorities such as the Ministry of Culture. Finally, a similar number of comments focused on marine resources and fisheries, an issue commonly raised by national NGOs in Istanbul.

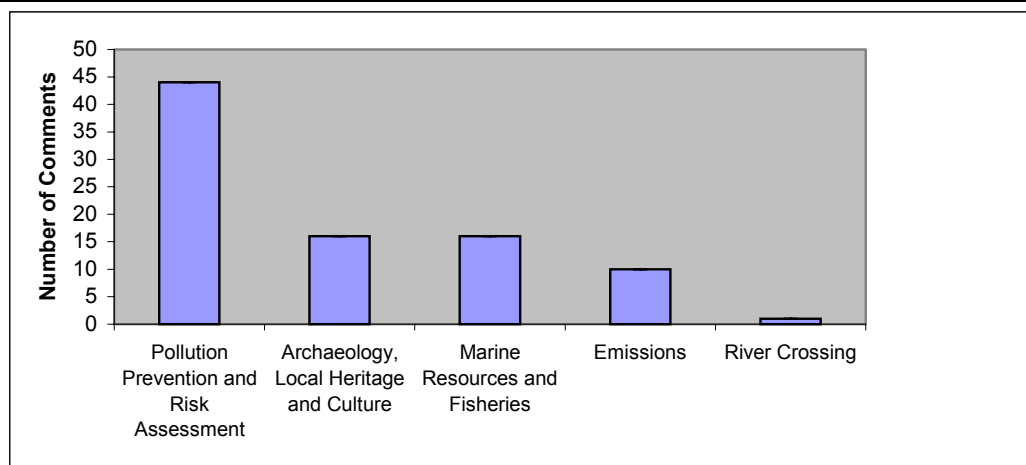


Figure A1.7 Analysis of Environmental Comments

4.7.5 Ranking of social concerns

4.7.5.1 Overall comments

The majority of issues raised during disclosure relate to socio-economic issues. The largest number of comments (752) relate to land – for example the procedures for acquisition and compensation, land use during construction and operation, and reinstatement. Similarly, a high proportion of comments/ questions (171) relating to employment (opportunities and recruitment procedures) were received throughout the disclosure period. These issues were most commonly raised by local communities, however were also a focal point of interest for other stakeholders.

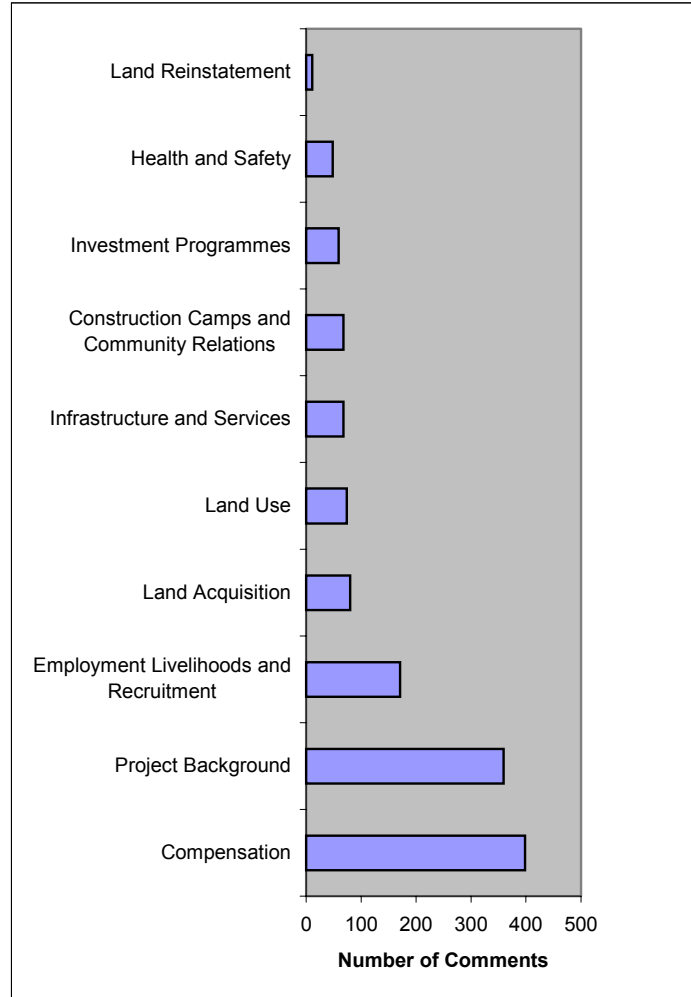


Figure A1.8 Analysis of Social Comments

4.7.6 Project background

General comments received on the project itself totalled 378 (23%). These comments included queries on the project design, pipeline routing, construction scheduling and project benefits. For example, over 30 of comments focused on project alternatives and whether there were more suitable routes or whether the route would change. Approximately 40 comments focused on the schedule of the project, when construction will start and how long it will last. At least 20 engineering specific comments were made (e.g., on trench depth) and approximately 30 focused on consultation including appreciative comments on the consultation process. Approximately 25 comments were made on the EIA report including nine indicating that it had been beneficial. Additional comments relate to the benefits of the project for Turkey, safety design, project management, general problems for Turkey, the use of contractors, and the issue of decommissioning.

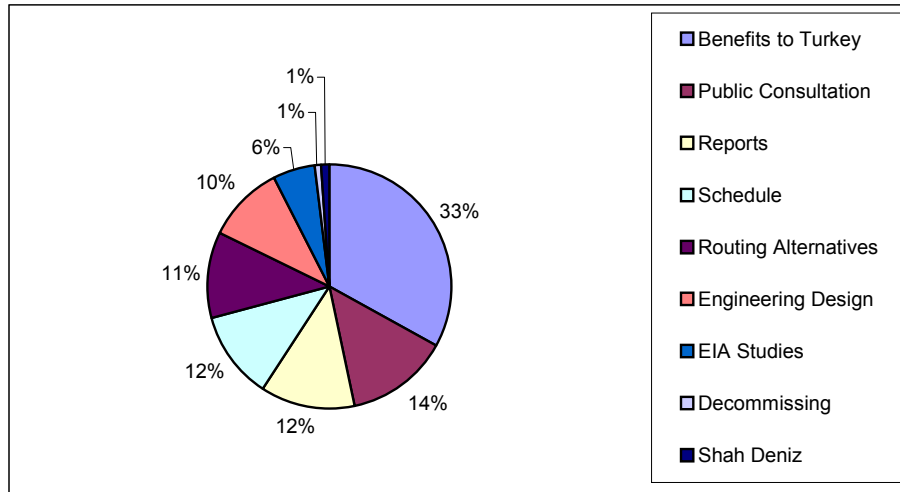


Figure A1.9: Project Background Issues

4.7.7 Comments By Stakeholder Group

A review of stakeholder comments made during disclosure indicates that although project background²⁵ related issues (see Section 4.7.6) were prioritised by all stakeholders, local community comments focused upon land use and compensation and to a lesser degree employment and recruitment, whereas national and local NGOs and the media focused upon a wider range of nonland issues including marine resources, emissions, construction camps, investment programmes, etc. The national stakeholders and local NGOs/ media are more concerned about the land acquisition process whereas local community comments tended to be focused on compensation.

4.7.7.1 State Authorities

Feedback from the various State authorities on the draft EIA was received during the formal meetings held with the authorities in Ankara and in the form of written responses received during the disclosure period. See Figure A1.9 for an overview of the issues raised by State authorities. The nature of their responses varied slightly from those received from other stakeholder groups, with the highest proportion of comments focussing on the issues of land use (28%), pollution prevention and risk assessment (20%), infrastructure and services (19%), archaeology (13%) and marine resources and fisheries (7%).

Specific comments or concerns raised by the Ministry of Environment (Department of Waste Management) included the following:

- Monitoring of incineration throughout construction;
- Reference to slop handling systems;
- Clarifications on terminology, references to regulatory requirements; and
- Permitting and licensing for waste management.

The Ministry of Culture raised various issues to be addressed including the following:

25. A large number of respondents commented that they were happy that Turkey was benefiting from the project, and that they were happy to be visited and consulted. These comments and statements of support for the project were included under the 'project description category'. This category also included questions on reports, schedule, engineering design and notably in Sivas (Akpınar village) routing alternatives.

- References to decrees and regulatory requirements of the provincial Protection Councils;
- Terminology used in relation to the designation of archaeological sites;
- Clarifications regarding the determination of sites;
- Allocation of responsibility to Ministry of Culture for various tasks; and
- Reference to decisions of regional preservation councils along the route.

The Ministry of Forestry (Directorate of Forestry) raised the following issues:

- References to mitigation measures encompassing biodiversity;
- Clarification on the right-of-way through forest areas;
- Location of the pipeline and AGIs in the context of their distance to forest areas;
- Clarification on the explanations of bio-restoration in the Reinstatement Plan;
- References to specific species in protected areas along the route;
- Clarification regarding terminology used or definitions provided in EIA;
- References to relevant legislation such as Forest Laws;
- Details regarding pine trees to be felled and associated compensation; and
- Measures to be outlined in a forest fire strategy.

The Ministry of Forestry (General Directorate Of Afforestation And Erosion Control) also raised the following issues:

- Requirements for the preparation of site specific plans;
- Role of the contractor in the implementation of mitigation measures for rejuvenation areas; and
- Ownership of pasture and meadow lands near forest areas.

The General Directorate of State Railways commented on the following issues:

- Clarification of terminology used in EIA;
- Use of signage at intersection points and exit/entry points of the pipeline; and
- Affect of telecommunication systems on railway telecommunications.

The General Directorate of Highways (TCK) commented that a sample protocol be included in the EIA.

The General Directorate of State Hydraulics Works (DSI) raised the following concerns or issues:

- Protocols regarding water crossings;
- Usage of water for hydrotesting;
- References to transboundary rivers; and
- Details of the protocol signed with DSI.

The Ministry of Agriculture raised the following specific concerns or issues:

- References to relevant laws and regulations; and
- Clarifications regarding terminology used in EIA.

The Undersecretariat of Maritime Affairs highlighted the following as issues identified during the disclosure process;

- Procedures for obtaining operational permits;
- Lighting systems for the proposed jetty; and
- Queries regarding oil spill response equipment.

The Ministry of Health raised the following concerns or issues:

- Clarifications regarding requirements for pipeline depth and width and health protection zones;
-

- Compliance with relevant regulations and laws such as those associated with protection against fire or use of liquefied oxygen tanks;
- Compliance with safety distances outlined in Ministry of Labour and Social Security charters of concern; and
- Permits and licenses required for the use of explosive materials.

The Ministry of Foreign Affairs highlighted the following issues during the disclosure period:

- Clarifications on data and information provided in EIA, (particularly Section 5); and
- Clarifications regarding terminology used in the EIA.

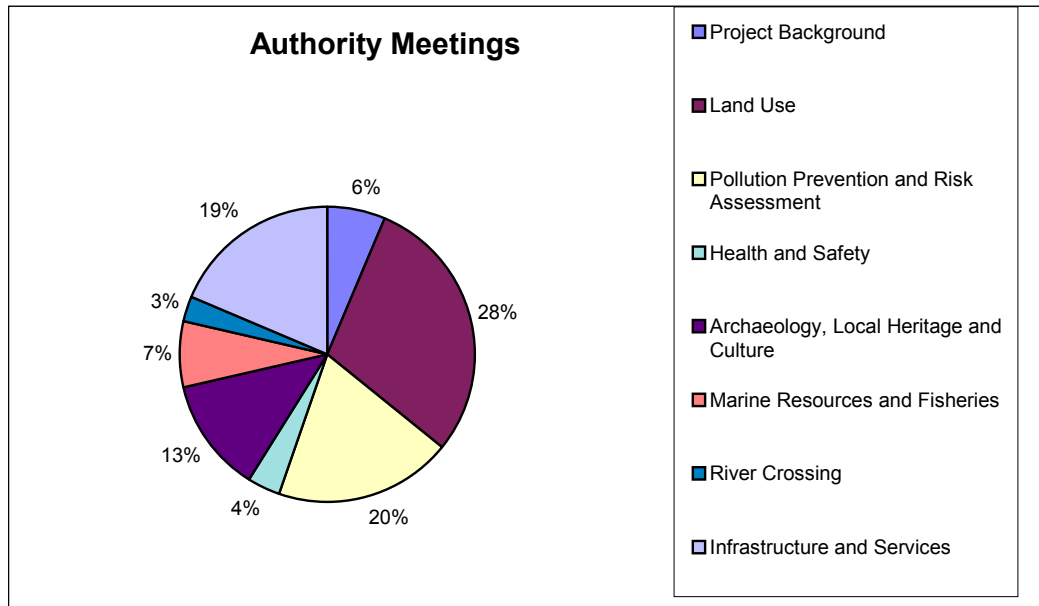


Figure A1.10. State Authority Meetings

4.7.7.2 National NGOs and National Media

During the disclosure meetings the primary focus for both the national media and key national NGO representatives was the project itself, for example some issues raised related to the rationale behind the routing of the pipeline, the cost of the project, the design life of the project and the influence of other planned or existing pipelines in the Caspian Region on BTC. Other examples of general project description related issues raised at the national NGO and media meetings included queries regarding the following:

- Composition of the companies involved in the BTC Consortium;
- Companies responsible for engineering design;
- The tendering process for construction contractors;
- The international or national standards being applied for the project;
- The project schedule and decommissioning phase;
- Other exploration or development activities being undertaken by companies involved in BTC;
- Responsibility for the security of the pipeline;
- Relationship between Turkey, Azerbaijan and Georgia; and
- The benefits of the project to Turkey and to BP.

Refer to Figures A1.10 and A1.11, which highlight the differences between the comments received by national media and NGO groups in Ankara and Istanbul respectively. In Istanbul 47% of comments focused on project description (compared to 28% in Ankara) and the two priority social issues were investment programmes (9% of comments) and construction camps/ community relations (11% of comments), although environmental issues were high on the agenda. For example, 19% of comments relate to marine resources and fisheries (potentially a reflection of their heightened awareness of marine issues). In Ankara, environmental issues were of significant concern and 21% of comments related to emissions (e.g. impacts on soil) and 8% to pollution prevention and risk assessment. In addition, a wide range of social issues were raised including construction camps and community relations (10% of comments); land acquisition (8% of comments); and investment programmes (5%).

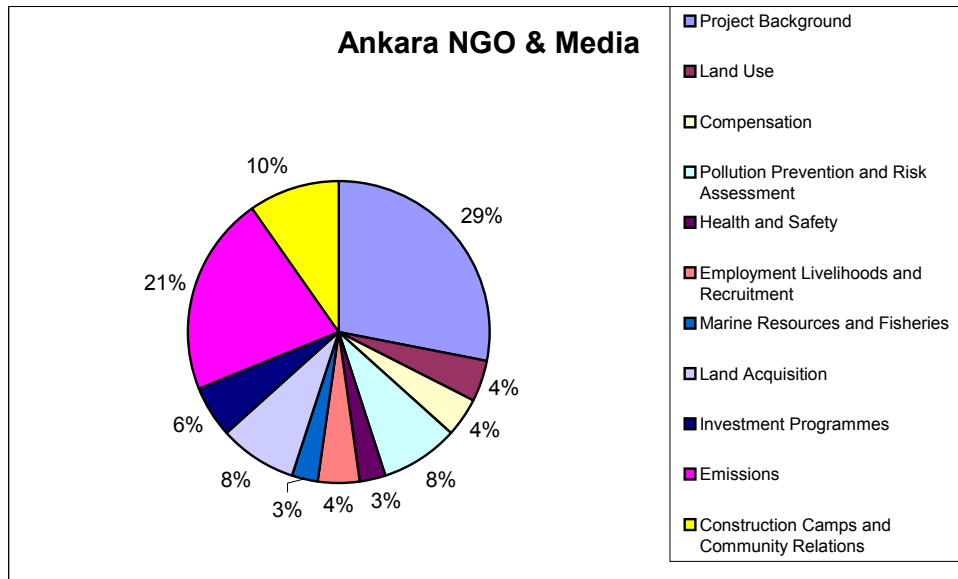


Figure A1.11 Ankara NGO and Media Responses

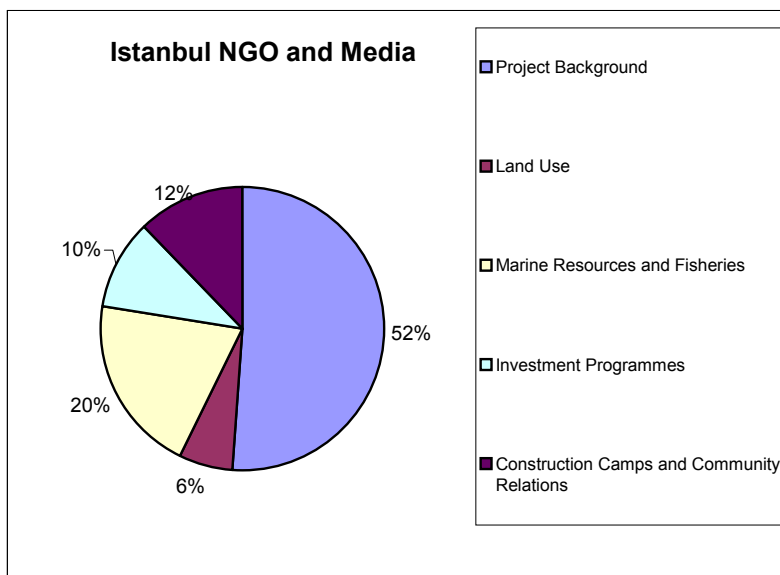


Figure A1.12 Istanbul NGO and Media Responses

4.7.7.3 Local Authorities

The outcome of the disclosure meetings with local authorities such as governors, subgovernors and mayors mirrored many of the issues raised by local communities and NGOs. The project background category comprised comments or concerns generally associated with issues such as the following:

- Aspects of the public consultation programme;
- Routing alternatives;
- Status of oil reserves in the Caspian region;
- Schedule for construction and operation;
- Aspects of the engineering design of the pipeline;
- Aspects of the EIA process and studies undertaken throughout EIA;
- Security of the pipeline;
- Other pipeline projects in Turkey, such as Shah Deniz; and
- Benefits of the project to Turkey.

Local authorities for all provinces along the pipeline route also raised land acquisition and compensation procedures, in addition to reinstatement of land and potential impacts on various land uses as comments or concerns (28% of 254 comments). Local authorities also made comments associated with the categories of pollution prevention and risk assessment (6%), infrastructure and services (6%) and construction camps and community relations (6%).

On a provincial level, variations are minimal with the exception of feedback on reinstatement issues, which was notably high from authorities in Erzincan province (32% of 54 comments), likely to be reflective of previous experience with the East Anatolian Natural Gas Pipeline construction. A further 14% of comments in Erzincan related to potential impacts on infrastructure and services. The highest proportion of comments was received from local authorities in Erzincan (54) followed by Kayseri, Sivas and Adana authorities (between 33 and 26).

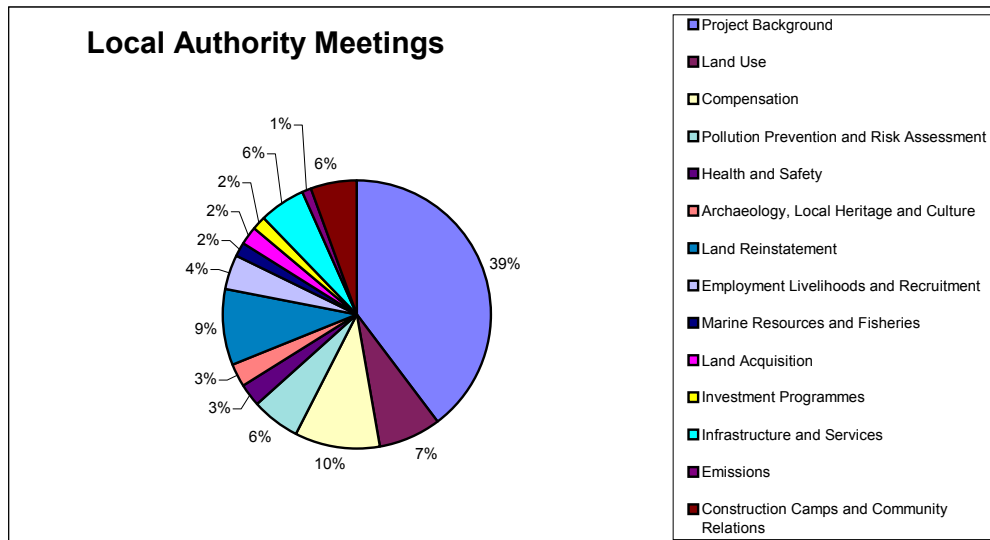


Figure A1.13 Local Authority Meetings

4.7.7.4 Local NGOs & Media

The primary focus of local NGOs and the media comment was on the project itself (approximately 50% of comments) - specifically the generic benefits of the project. The kinds of comments made and categorised as project background related to the following issues:

- Security and safety of the pipeline;
- Benefits of the project to each of the provinces and to Turkey;
- Routing alternatives of the pipeline;
- Availability of project materials;
- Timing of the project including construction, operation and decommissioning phases;
- Public consultation process; and
- Details regarding engineering design, such as location of project facilities.

Other priority issues included marine resources, land use and compensation, pollution and emissions. A key area of concern for NGOs was pollution prevention and risk assessment.

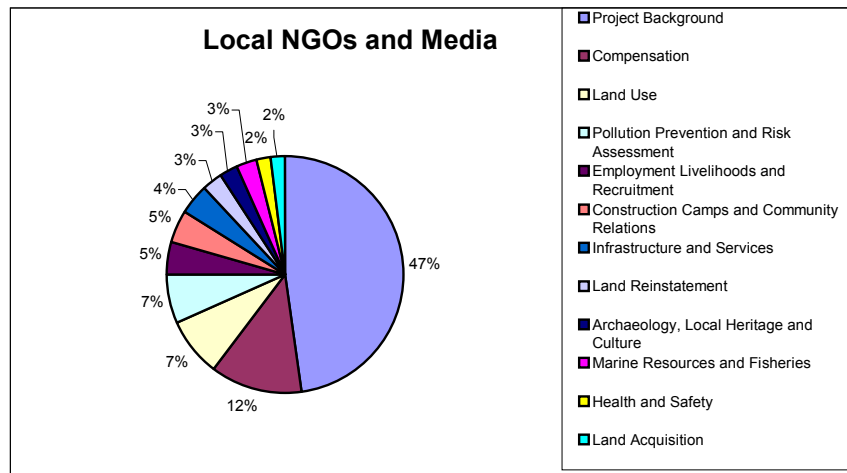


Figure A1.14 Local NGO and Media Responses

4.7.7.5 Communities

Overview of Environmental Comments

Only a small number of comments raised in the community meetings were directly concerned with impacts on the natural environment. Not one comment was repeated. However, the following generic issues were raised once or twice in separate settlements:

- The potential for the pipeline to create erosion;
- The impact of earthquakes on the pipeline;
- The potential for groundwater contamination;
- Potential damage to flora and fauna;
- Noise and dust disturbance during construction;
- Visual impacts (e.g., whether the pipeline would be covered in asphalt or vegetation); and
- Impacts from construction traffic.

Overview of Social Comments

In addition to the high proportion of comments from local communities received in relation to issues of land acquisition, compensation procedures and employment opportunities, many of the comments received during the community disclosure meetings relate to the impact of the proposed pipeline on the human and built environment, notably agricultural land, roads and irrigation channels. These comments were particularly prevalent in communities with previous pipeline experience associated with the East Anatolian Natural Gas Pipeline. In these settlements, comments focused not only on potential damage to the built/human environment but given past experiences of reinstatement, how the previous damage is to be rectified and how it will be avoided for the BTC Pipeline.

4.7.8 Provincial variations

The overview of environmental and social responses described above indicates that the vast majority of community comments/ questions related to social rather than environmental issues. This is reflected in the provincial breakdown - only one environmental issue, pollution prevention/ risk assessment, was the subject of 7% or more comments and in only two provinces - Adana and Osmaniye.

The top two issues (either social or environmental) receiving the majority of comments were project description and land compensation. Only in Kahramanmaras and Kayseri were employment, livelihoods and recruitment associated with more than 10% of all comments. Land reinstatement was an important issue for Erzincan, Erzurum and Sivas (receiving more than 15% of comments) – all three of which have had previous pipeline experience. Construction camps and community relations received in excess of 10% of comments only in Osmaniye – partly explained by the high level of interest of residents in this province of the potential benefits of construction camps. Generally, impacts on infrastructure and services regularly received between 5% and 7% of comments. Finally, the issue of archaeology/ cultural heritage were raised by more than 5% of disclosure respondents solely in Adana.

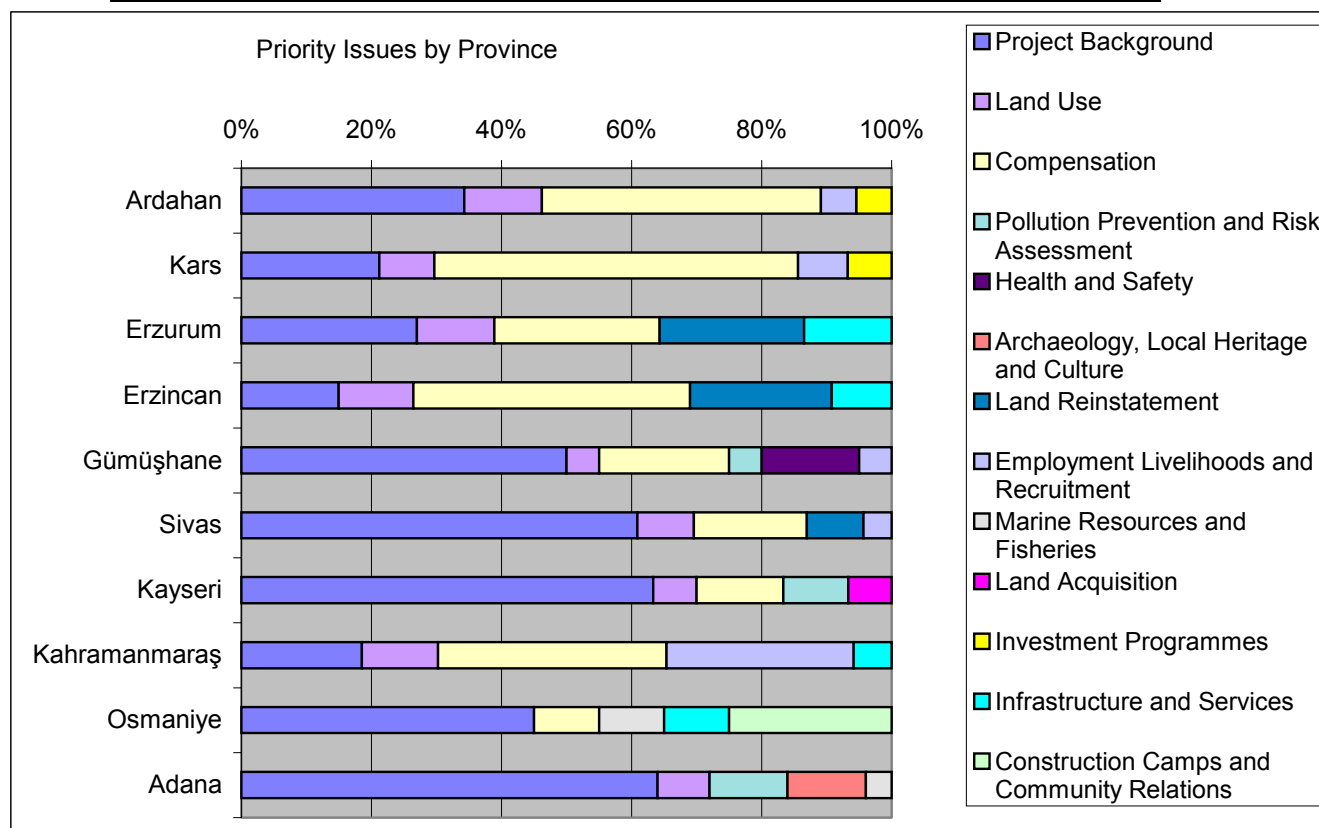


Figure A1.15 Priority Issues by Province

- Ardahan:** the priority issues for local residents consulted in this province during disclosure were compensation for land used for the project impacts on land use and general project description related issues. Given the lack of a land cadastral service (and resulting prevalence of land ownership without titles), in addition to the difficult climatic and topographic conditions in the province, it is natural that land issues are of high importance. The project description related issues raised by local residents included benefits of the project to Turkey and to Ardahan, details of the public consultation programme and queries related to the schedule for construction and operation of the pipeline. A small proportion of comments were related to employment opportunities.
- Kars:** in view of the similar climatic and conditions in Kars (and the shortage of land titles), it is natural that land use and land compensation are similarly priority issues in this province. Interestingly, Kars and Ardahan had the highest proportion of comments regarding the projects investment programmes. A small proportion of comments were related to employment opportunities.
- Erzurum:** the priority issue for residents consulted in Erzurum is to understand the project in greater detail. This concern can be attributed to previous project experience. Specific comments categorised as project background included those associated with benefits of the pipeline to Turkey and Erzurum, aspects of the public consultation programme and the routing of the pipeline. In addition, the reinstatement procedures were questioned, again, most likely related to previous experience. Inhabitants in Erzurum have the highest interest in the issue of impacts on infrastructure and services.

- **Erzincan:** the priority questions for residents in Erzincan relate to compensation procedures, the project (e.g., potential benefits, aspects of public consultation and aspects of the EIA) and land reinstatement. Many residents of this province experienced the construction of the East Anatolian Natural Gas Pipeline, and as a consequence are insistent that there is a proper reinstatement strategy for BTC.
- **Gumushane:** most of the concerns raised by the inhabitants of this province concerned general project background issues such as benefits to Turkey and Gumushane, routing alternatives of the pipeline and the security of the pipeline. Otherwise the, priority interests recorded were compensation, health and safety and employment opportunities and recruitment for the project.
- **Sivas:** following comments on project description (benefits to Turkey and Sivas, aspects of public consultation engineering related comments) and land reinstatement and compensation, a small proportion of comments relate to employment opportunities and recruitment.
- **Kayseri:** the disclosure findings suggest that in addition to comments on project description (primarily routing alternatives and engineering design), compensation and impacts on land use, important issues for inhabitants of Kayseri include the land acquisition process and pollution prevention and risk assessment.
- **Kahramanmaras:** because productive agricultural areas are characteristics of this province, notably in the south, the majority of comments relate to land, e.g., compensation and impacts on land use. However, there is concern the agricultural incomes may be reduced as a result of the project and thus a large proportion of the comments relate to employment, livelihoods and recruitment. Residents were also interested in the benefits of the project to Turkey and Kahramanmaras, aspects of the public consultation programme and routing alternatives of the pipeline.
- **Osmaniye:** similar issues (project background, land use and compensation) were raised in Osmaniye. In addition, in view of interest in potential benefits of the project construction camps and the desire to locate a camp nearby, a large proportion of comments were regarding construction camps and community relations. In addition comments regarding impacts on infrastructure and services featured in this province. General project background comments covered issues such as benefits of the project to Turkey and Osmaniye, details of the construction and operation schedule and aspects of the EIA report and studies undertaken as part of the EIA.
- **Adana:** once more, the concerns were similar to responses from the other provinces and comments focused primarily on project description type issues, archaeology, local heritage and culture issues; and pollution prevention and risk assessment related issues. Impacts on land use and employment opportunities featured however were less commonly raised.

5 PHASE 6: PUBLIC DISCLOSURE OF THE DRAFT RAP

In accordance with World Bank/IFC guidelines, BTC Co. must ensure that the draft Resettlement Action Plan (RAP) is made available through the World Bank's Info Shop and at selected locations in Turkey for a period of 60 days prior to the submission of the project for IFC Board consideration. In addition, BTC Co. will ensure that the draft RAP is available throughout the project area in the local language. During the disclosure period, interested and affected parties will submit their comments and concerns about the draft RAP²⁶.

The draft RAP will be made available at the following locations along the pipeline route:

- Offices of the relevant State authority;
- Offices of Provincial Governors (10);
- Offices of District Governors (32);
- National universities (10);
- Regional universities (7);
- National libraries; and
- Project website.

The availability of the draft RAP will also be publicised through advertisements in the print media, and in public places. During the disclosure period, methods for collecting public feedback will include provisions for written feedback.

As mentioned above, much of the disclosure for the key land related aspects of the RAP has already been carried out. A series of public meetings were held during the consultation and disclosure period for the draft EIA, including at the local level, during which land related issues were discussed. However, it is acknowledged that although residents had access to the draft EIA they were unlikely to have read or reviewed it in any detail, if at all. Therefore, their comments are based both on responses to reader friendly summaries of the EIA (NTS and community pamphlet) and of the RAP Guide to Land Acquisition and Compensation. Nevertheless, these public meetings provided people with the opportunity to comment on the NTS and community pamphlet of the EIA, which includes issues concerning land acquisition. The disclosure process included meetings with stakeholder groups at the community, district, provincial and national levels. A special effort was made to highlight land acquisition issues and to respond to stakeholder concerns received during the preparation of the EIA. Indeed, throughout the process of corridor and site identification, communities have been informed of land acquisition. It was evident that during the pre-testing and implementation of the socio-economic survey of the directly affected people, a majority of the affected plot owners were aware of the fact that a part of their plot would be expropriated,.

In addition to these measures, the draft RAP will be posted in the World Bank's Info-Shop and the feedback received will be reflected in its finalization.

26. IFC Handbook for Preparing a Resettlement Action Plan, 8/7/2001, p. 14

5.1.1.1 Guide to Land Acquisition and Compensation

The project has prepared a “Guide to Land Acquisition and Compensation” for distribution to all project affected people (approximately 30,000 landowners and 1,100 tenants/sharecroppers) along with a notification letter sent by DSA. This pamphlet provides more specific information on:

- The process for land acquisition;
- Who is eligible for compensation;
- How compensation values are calculated; and
- Answers to questions frequently asked by affected land owners and users.

The first set of pamphlets was distributed to 6000 landowners on 14th October 2002. The remainder will be distributed regularly and systematically in line with the schedule for land acquisition. The aim is to provide additional information on the RAP findings to project affected people (including absentee owners) prior to the negotiation meetings. Much of this information however has already been covered during the disclosure phase of the EIA.

5.1.1.2 Training of DSA personnel

Line managers and staff of the expropriating agency are well trained in RAP related issues and were well informed of the project RAP activities at the outset of the corridor identification process. In addition, special training on the RAP and its implementation was provided to the headquarters staff and field managers of DSA/BOTAŞ responsible for implementing the land acquisition process. Equally important, 12 field teams, each consisting of three people, will be trained in information/communication, negotiation and conflict resolution skills to be applied during the RAP implementation process. The training will be repeated at regular intervals in order to continuously improve the team’s collective skills in RAP implementation.

5.1.1.3 Meetings with the Project Affected People

The DSA negotiation committees - specifically trained on land issues - will visit all project-affected settlements and brief the project affected people about the project, with particular focus on the land/asset valuation methodologies, legal procedures for land acquisition and compensation process.

After a general presentation to the project affected people in each settlement, the land experts will hold individual meetings with each land owner/user in order to reach an agreement on the value of land and assets. Parcel-based land and asset evaluation will be explained and the proposed value will be agreed together with the landowner/user.

An independent NGO Rural and Urban Development Foundation (RUDF), specialists in land acquisition and resettlement issues, will also be involved in negotiation meetings, to ensure the fairness and transparency of the land acquisition process. RUDF was directly involved as an independent auditor in the establishment of the land/assets valuation methodology before to the implementation of the RAP.

The RAP specifies ongoing consultation with project affected people and identifies monitoring and grievance mechanisms for the implementation of the land acquisition process.

6 PHASE 7: CONSULTATION DURING CONSTRUCTION, OPERATION AND DECOMMISSIONING

6.1 COMMUNITY RELATIONS IN CONSTRUCTION PHASE

This section set outs the proposed objectives, mechanisms and responsibilities for liaison with settlements affected by the project during the construction phase. It identifies the approach to, and frequency of, consultation with affected settlements.

The primary responsibility for liaison will be borne by the construction contractor. BOTAŞ will therefore require the contractor to develop its own plan and more detailed proposals for community liaison. This will build on the approach outlined in this section. All potential contractors will be required to draw up this plan as part of the tender process.

6.2 OBJECTIVES AND DIVISION OF RESPONSIBILITY

The objectives of the Community Relations Programme will be to:

- Provide local residents affected by the project with regular information on the progress of work and implications for these settlements;
- Inform the project/contractor of any community related issues that may impact construction;
- Monitor implementation of mitigation measures and the impact of construction via direct monitoring and feedback from settlements;
- Identify any significant new issues that may arise during the construction period; and
- Manage any complaints against the project/contractors and local residents (i.e., provide a grievance mechanism).

The responsibility for the Community Liaison Programme, and employment of community liaison staff, will be divided between the BTC Co., BOTAŞ and the construction contractor. It is intended that, during the construction phase, the contractor will have day-to-day responsibility for community liaison and will be the primary point of contact with affected settlements. During construction the teams in each spread will be laying the pipeline in approximately 20km section. Each spread team will also be working at discrete locations to construct above ground facilities, operate pipe dumps and run a construction camp. Communication with affected settlements will be achieved by the construction contractor providing adequate resources to manage community liaison on each pipeline spread and for the marine terminal construction.

The contractor shall appoint full time dedicated Community Liaison Officer(s) (CLOs) as required in order to fulfil the Scope of Work as detailed in the Social Management and Monitoring Plan (see Appendix C8). CLOs will be appointed for each contract and will be responsible for the coordination of project public relations and external liaison needs. The CLOs will also manage the good reputation of both BOTAŞ and the construction contractor and liaise with third parties who are or may be affected by the execution of the Works as well as interface with landowners.

Both BOTAŞ and the BTC Co. will appoint staff with responsibilities for community relations. In accordance with the role of BOTAŞ as the Turnkey Contractor and the assurance role of the BTC Co., the team will consist of the following:

- BOTAŞ: one Community Relations Manager and seven Community Relations Supervisors responsible for overseeing all works carried out by the contractors, one of which will be based full time in the Ankara project office.
- BTC Co.: an LTO Assurance Co-ordinator who will oversee six LTO Assurance Advisors field staff (with environmental and social responsibilities)

The Community Relations Team of BOTAŞ and BTC Co. will be empowered to stop the works if they are of the opinion and can demonstrate that the requirements of the Social Management and Monitoring Plan (SMMP) have been deviated from.

The community relation roles will be duplicated for each contract. At the present time it is envisaged that there will be separate contracts for the following:

- For each Lot (thus a total of three contracts) – including pipeline construction, pipe dumps, construction camps, access roads and block valve stations;
- One Contract for Marine Terminal – onshore and offshore; and
- One Contract for the four pump stations and pressure reduction station.

The interactions and roles of the community relations teams are outlined in Figure A1.15.

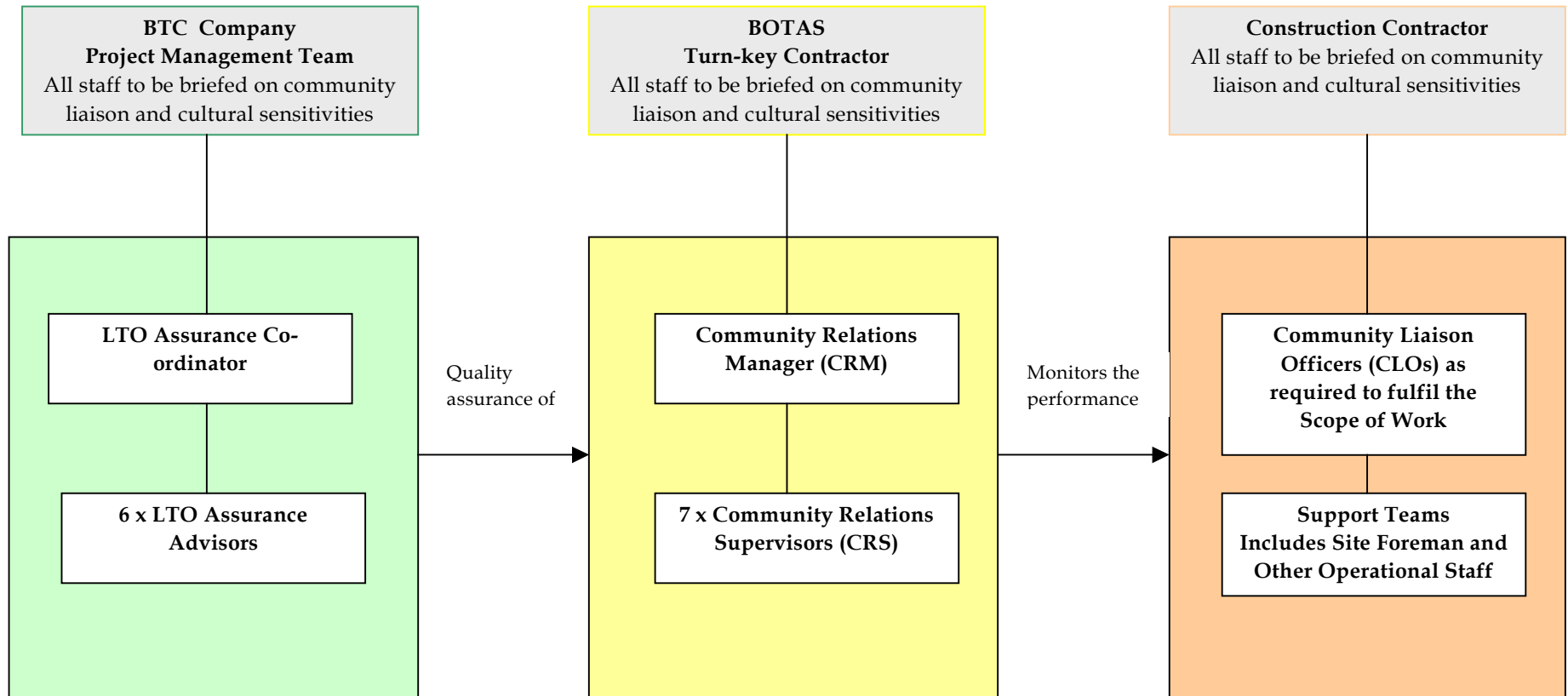


Figure A1.16 Roles and Responsibilities of Community Relations Teams

6.3 RECRUITMENT AND TRAINING

The Community Liaison team will be overwhelmingly made up of country nationals. The Community Relations Manager, employed by BOTAŞ, was appointed in April, when preparatory work began. The Community Relations Supervisors were appointed between April and September. The Community Liaison Officers of each contractor will be appointed no less than one month prior to construction.

All other members of the Community Liaison team will also be in post at least one month prior to commencement of construction (i.e., during the construction mobilisation phase of the project). This will be necessary in order to enable them to be fully briefed, integrated into the project team, given adequate training, and be in a position to provide training for other staff with community liaison responsibilities.

BTC Co., BOTAŞ and the construction contractor will brief all staff on community liaison and cultural sensitivities as part of the overall project induction training. The CLOs will be Turkish speaking, preferably with an understanding of English and the project area. They will preferably be graduates with a degree or diploma that has a social focus, with proven field skills in communications and a minimum of two years relevant experience, preferably in community relations. A minimum of one in every three CLOs will be female. All CLO appointments shall be subject to interview and approval by the BOTAŞ.

6.4 BOTAŞ ROLE IN COMMUNITY LIAISON

BOTAŞ will be accountable for overall community liaison. BOTAŞ will be primarily responsible for the following:

- Assist the contractors to develop community relations procedures prior to construction start-up, including required management plans, recruitment procedures, contracting procedures, CLO recruitment and training;
- Agree dispute resolution process with Project Participants, contractor and local settlements;
- Monitor implementation of/adherence to all relevant management plans through liaison with the contractor and meetings with settlements;
- Identify breaches of management plans, and recommend corrective action. Stop work in the event of serious breaches that may cause serious impacts on local settlements or on the reputation of the project;
- Track the social impact of the project against the BTC Objectives and Key Performance Indicators as stipulated in the Social Management and Monitoring Plan (SMMP) and work with the contractors where improvements are required;
- Monitor processing and resolution of complaints and ensure alignment with dispute resolution process and working practice of project security team;
- Provide regular information to the BTC Co. on performance; and
- Represent the project at community meetings.

The Community Relations Manager (CRM) will have overall responsibility for community liaison during the construction period. She will ensure that the contractor carries out their responsibilities in relation to the social impacts of the project, and that smooth relations with local residents are maintained. As part of this role, the CRM's responsibilities will include:

- Collecting and analysing the reports submitted by the CLOs and dealing with issues arising, alerting the BOTAS management team or BTC Co. management as appropriate;
- Keeping a close eye on the overall levels of complaints reported and ensuring that the processes for dealing with those complaints and other related disputes are prompt and effective;
- Organising pipeline attitude surveys (as required by the mitigation and monitoring plan) and ensuring that the results are analysed and appropriate management responses implemented; and
- Ensuring that there is an appropriate balance in community liaison between the pipeline spread itself and the construction camps and pipeyards, encouraging the reallocation of resources by the contractor as appropriate.

Seven Community Relations Supervisors (CRS) will be in charge of all community relations associated with the construction of the pipeline. They will be supported by the contractors' Community Liaison Officers (CLO).

The roles of the CRS will be as follows:

- Monitor implementation of the management plans for community relations, construction camps, and traffic, through liaison with the contractor and meetings with local residents;
- Identify breaches of management plans, and recommend corrective action;
- Monitor construction contractor recruitment strategy, through review of proposed processes and liaison with contractor staff at recruitment centres;
- Monitor the processing and resolution of complaints;
- Provide regular information to the project team for communication to external audiences on the social impact of the project and community liaison activities;
- Represent BOTAS at community meetings on occasion, as requested by the construction contractor;
- Provide support to the contractor in the development of their CL teams, in particular prior to construction;
- Agree a dispute resolution process between BOTAS, BTC Co., the construction contractor and local residents, based on the grievance procedure attached;
- Develop community relations procedures consistent with BOTAS and project social and security policies, and ensure that CLO training is consistent with this approach;
- Training of all contractor staff with community liaison responsibilities;
- Communication with local residents affected by the project;
- Provision of reports to BOTAS; and
- Management of contractor CLOs.

6.5 CONSTRUCTION CONTRACTOR ROLE IN COMMUNITY LIAISON

The Construction contractor will be required to adhere to the requirements of the Social Management and Monitoring Plan (SMMP) that sets out how the contractor will meet and monitor the mitigation measures recommended by the BTC Co. and BOTAS in relation to the areas of social impact. This will be reviewed and finalised by BTC Co. in agreement with BOTAS.

The role and responsibilities of the contractor include:

- Provide primary interface between project and affected settlements;
- Coordinate and implement required pre-construction activities, namely;
 - produce management plans for community relations, construction camps and transport;
 - train staff with community relations responsibilities; and
 - implement induction training workshops for all construction staff;
- Assist in local recruitment process; and
- Ensure on-going communication with affected settlements through the following activities;
 - Meet with community leaders and hold community meetings prior to arrival of construction teams in a given locality to inform local residents about construction activities, work schedule, construction staff Code of Conduct, grievance procedure, safety issues, dates of future meetings and contact details of CLO staff;
 - Hold fortnightly meetings with directly affected settlements during construction (monthly close to pump stations and pressure reduction stations) to provide information on progress and provide channel for issues and queries to be raised;
 - Liaise with contract representatives on major issues arising and ensure that the local residents are kept informed of any expected or unexpected disruption through leaders and by maintaining a community notice board;
 - Provide a focus for negotiation and resolution of specific disputes with residents if/when they arise, using the dispute resolution procedure;
 - Submit fortnightly and monthly social impacts reports to the project; and
 - Monitor processing and resolution of complaints and ensure alignment across the project with the dispute resolution process.

Successful community liaison will be achieved through sharing this responsibility throughout the Construction contractor's team. Each work team will allocate primary responsibility for community liaison to an individual. These individuals will liaise with the team of dedicated CLOs, and involve them as necessary.

6.5.1 Community Liaison Officers (CLOs)

The construction teams in each spread will be working approximately along a 20-kilometre length at any one time. It is anticipated that the contractors will provide CLOs to liaise with settlements along the pipeline route. Their roles are likely to include the following:

- Meet settlement leaders and speak at settlement meetings prior to arrival of construction teams in a given locality, to inform them of the nature and length of activities in their area;
- Hold regular meetings with settlements adjacent to the pipeline worksite, AGIs and construction camps;
- Support implementation of the Construction Camp Management Plan;
- Advise the camp management and BOTAŞ Community Relations Supervisor of changes required to the Camp Management Plan;
- Meet with local residents close to smaller camps and AGIs on a monthly basis and advise contractor management on issues arising from these meetings;

- Produce fortnightly reports on implementation of the camp management plan, specific incidents and actions taken to address community concerns;
- Provide a focus for negotiation and resolution of specific complaints from local residents if / when they arise, using the dispute resolution or grievance procedure;
- Liaise with contractor staff with primary responsibility for community liaison in each work team;
- Liaise with the management of the spread team on major issues arising, and provide feedback to local residents on responses to these issues;
- Monitoring implementation of the Traffic Management Plan, through liaison with other contractor staff given responsibility for this;
- Holding meetings, on a monthly basis, with settlements identified in the Traffic Management Plan as most affected; and
- Producing a monthly report on implementation of the traffic management plan.

6.6 COMMUNITY RELATIONS IN OPERATIONAL PHASE

The objective of the Community Relations Programme in this phase will be to:

- Maintain constructive relationships between local residents and the pipeline operators, to assist in the operation of the pipeline;
- Maintain awareness of safety issues among local residents along the pipeline route;
- Ensure compliance with land use constraints among land owners along the pipeline route; and
- Monitor community attitudes to the pipeline and operating company.

A freecall telephone 'hotline' was established in June 2002, thus enabling anyone with concerns about the project to call during the disclosure period. Its ongoing function will be to enable stakeholders to contact the projects community relations team during the construction and operation period. During that period there will also be an email address and a postal address to which written comments or complaints can be sent. Clearly, however, the telephone, email and postal contacts will be of limited use to residents outside the larger settlements. The Community Liaison Officer will therefore be an important link for individuals at the settlement level, both for registering opinions and comments and for keeping local residents informed of developments, up-coming meetings and consultations.

Although BOTAS, as the Turnkey Agreement, is required to resolve outstanding community relations matters or undertake any work necessary for a 12 month warranty period following construction, responsibility for community liaison during the operational phase will fall solely to the BTC Co. The precise nature of this team has not yet been finalised. It is currently envisaged that the team will be managed in Ankara and that field members of the team will be locally recruited to perform a dedicated Community Liaison role. Members of this team during the operational phase will be required to:

- Hold regular meetings with settlements along the pipeline route, in the vicinity of the marine terminal and AGIs as appropriate;
 - Maintain awareness of safety issues;
 - Monitor the pipeline route, to ensure compliance with land use constraints;
-

- Provide monthly reports to the pipeline operating company on issues arising from liaison with local residents; and
- Inform the operating company immediately of breaches of safety or land use constraints, or serious disputes from settlements along the pipeline route.

6.6.1 Decommissioning

In the event of decommissioning of the pipeline, liaison would continue to take place by the BTC Co. with settlements prior to de-commissioning. This role would complement work carried out by the operating company and social investment team to reduce the negative impact of pipeline decommissioning.

7 TIMING OF CONSULTATION ACTIVITIES

The timing of the various consultation activities described above is shown in Table 7.1 below.

Table 7.1: Timing of Consultation Activities

Stakeholder group	Schedule
PHASE 1	
<ul style="list-style-type: none"> • Stakeholder Identification • Preliminary Consultation • Consultation During Scoping 	<p>19th July – 6th August 2001 27th August – 31st October 2001</p>
PHASE 2	
<ul style="list-style-type: none"> • Information Distribution • Introductory Meetings with Governors • Introductory Meetings with Sub-governors, Muhtars and local authorities 	<p>6th August – 17th August 2001 12th August – 28th August 2001</p>
PHASE 3	
<ul style="list-style-type: none"> • Impact Identification • Meetings with Local NGOs and Other Interest Groups • Meetings with National NGOs, Interest groups, IFIs and Media • Meetings with Settlements along the Pipeline and in the Vicinity of the Marine Terminal • Consultations Through Various Preparatory Phases of the Land Acquisition Process 	<p>17th September – 28th September 2001 11-12th October (Istanbul), 15th October 2001 (Ankara) 3rd September – 20th October 2001 October 2000-September 2002 (Basic and Detailed Engineering)</p>
<ul style="list-style-type: none"> • Additional Consultation for the RAP <ol style="list-style-type: none"> 1. Socio-economic survey for RAP 2. Consultation with the absentee owners 3. Additional consultation with the fishermen, local authorities, fishing companies, fishing experts etc during the impact analysis undertaken by TUDAV. 	<p>May 2002 12 June 2002 15th-19th August 2002</p>
PHASE 4	
<ul style="list-style-type: none"> • Development of Mitigation Measures • Mitigation Testing Meetings 	<p>End January – early February 2002</p>
PHASE 5	
<ul style="list-style-type: none"> • Disclosure of Draft EIA • Consultation During Disclosure of the Draft EIA 	<p>End June – End August 2002 Early July – Early August 2002</p>
PHASE 6	

**BTC PROJECT EIA
TURKEY
FINAL EIA**

Stakeholder group	Schedule
<ul style="list-style-type: none"> • Start of Disclosure of Guide to Land Acquisition and Compensation • Disclosure of the RAP • First Notification Letters • Meetings with the PAPs 	<p>14th October 2002</p> <p>November 2002</p> <p>14th October 2002</p> <p>13th November 2002</p>

Consultation is an ongoing process. It has continued after the approval of the EIA by the Turkish government on 18th October 2002. It will continue to be an integral component of the design, construction, operation and closure of the BTC Project. Specifically, it will involve the following:

- Ongoing dialogue through the community liaison activities and recording via the BOTAS comments and feedback procedures;
- Ongoing opportunity to contact the project through community relations free hotline and BTC Co. and BOTAŞ contact details on project documentation;
- Ongoing dialogue with a range of interested stakeholders including NGOs, local authorities, media, academic institutions, etc.; and
- Indirect feedback through the environmental and community investment programmes.

8 RESOURCE ISSUES: STAFF TIME AND COSTS ASSOCIATED WITH CONSULTATION

This section sets out the estimated resource implications of the proposals set out in this PCDP, as required by World Bank standards. It includes both staffing levels and specific costs associated with consultation.

8.1 PRE-CONSTRUCTION

The focus of consultation prior to construction is the development of the EIA. Section 4 outlined the specific consultation activities carried out as part of this process.

8.1.1 Staff time

Dedicated teams during the pre-construction phase will oversee the EIA process and related project activity. These teams will devote a significant proportion of their time to involvement in and support for the public consultation process. The team is committed to participating directly in all consultation at national level, and to participate as team members in consultation activities at the local level.

8.1.2 Resource implications

The EIA (national and international) consultants are responsible for public consultation at the local and national level. Over a period of approximately 12 months during which consultation will take place, the size of the team will have grown to at least 70 people working full time at peak periods of consultation and data collection. The resources to finance this consultation are provided by BTC Co. and BOTAŞ.

8.2 CONSTRUCTION AND OPERATIONAL PHASES

8.2.1 Staff time

During the construction phase, a team of a minimum of seven (expatriate and national) BTC Co. personnel will address community relations and environmental and social assurance issues, ensuring that commitments made on the EIA are fulfilled, working directly with BOTAŞ and their construction contractors.

The precise staff implications for the operational phase have not yet been defined. BTC Co. is committed to maintaining a presence along the pipeline route through a reduced Community Relations team.

8.2.2 Resource implications

The resource implication of the above activity is the employment of the staff proposed above by BTC Co. The appropriate rates of remuneration for these staff have not yet been determined.

9 GRIEVANCE MECHANISM

9.1 LOCAL RESIDENTS COMPLAINTS PROCEDURE

9.1.1 Purpose and scope

To ensure all complaints from local residents are dealt with appropriately with corrective actions being implemented and the complainant being informed of the outcome. It will be applicable to all complaints received from any project-affected settlements.

9.1.2 Responsibilities

The Community Liaison Officers will be responsible for collating written complaints and co-coordinating responses to all complaints.

9.1.3 Procedure

9.1.3.1 General complaints

All complaints shall be handled in accordance with the flowchart below. Both verbal and written complaints are to be entered on the Complaints Log (see below) and a Complaints Action Form (to be developed prior to construction).

When receiving a complaint all employees shall refer the complainant to the Community Liaison Officer or the HSE department. Any members of the HSE department receiving a complaint shall ensure that the Complaint Action Form is completed. The form shall then be forwarded to the Community Liaison Officer who will assign it a number. The Community Liaison Officer shall ensure that all actions are made to close out the complaint.

9.1.3.2 Complaints log

Ensures that each complaint has an individual number and that tracking and recording actions are carried out. It also records who is responsible for an individual complaint and records dates for the following actions:

- Date the complaint was reported;
- Information on proposed corrective action sent to complainant (if appropriate);
- The date the complaint was closed out; and
- Date response sent to complainant.

9.1.3.3 Complaints action form

This specifies the information required to ensure the complaint is dealt with. The form is split into four parts:

Part A: Information about the complainant, the number of the complaint (taken from the Complaints Log).

Part B: The complaint section, where all the details relevant to the complaint are recorded.

Part C: For recording the immediate action required and identifies the long term corrective action (if required).

Part D: Details how the corrective action shall be verified and signed off.

9.2 RESPONDING TO A COMPLAINT

All complaints shall be responded to in writing, though a verbal response will be provided as well if this is more appropriate in the circumstances (e.g., where the complainant can not read).

All complaints must be responded to within two weeks of being received, even if the response is just a summary of what is planned and when it is likely to be implemented. Further correspondence should be given once the complaint is closed out.

9.3 MONITORING COMPLAINTS

The head CLO will be responsible for providing BOTAS with a weekly report detailing the level of complaints and any outstanding issues to be addressed. Monthly reports will include analysis of the type of complaints, levels of complaints and action taken to reduce complaints.

9.4 RECORDS

The Community Liaison Officer shall file all documentation related to complaints in a file in his office. All complaint documentation shall be kept on file for two years then archived.

Levels and types of complaints will be monitored through the Community Impacts Management and Monitoring Plan, as well as the speed with which complaints are dealt. The procedure for handling complaints is provided in Figure A1.1.

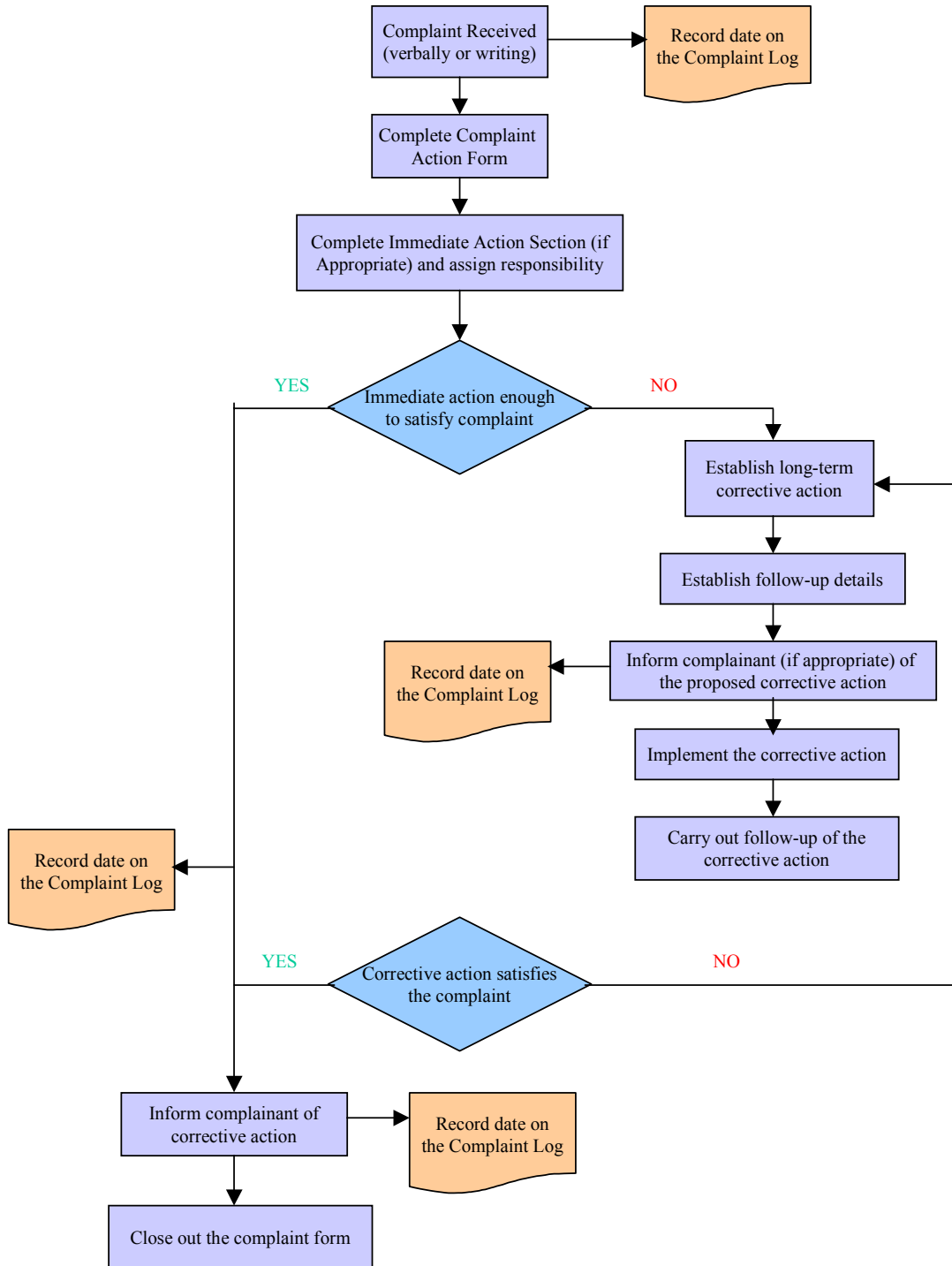


Figure A1.17 Complaints Procedure Flowchart