Integrated ESIA Greece
Section 7 - Stakeholder Engagement
7 STAKEHOLDER ENGAGEMENT

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7 STAKEHOLDER ENGAGEMENT

7.1 Introduction

Stakeholder engagement is a key element of the ESIA process. The purpose of stakeholder engagement is to allow stakeholders to interact with the project’s decision-making process, express their views and influence mitigation and technical solutions to concerns voiced during the process.

Stakeholder engagement is an inclusive and culturally appropriate process which involves sharing information and knowledge, seeking to understand the concerns of others and building relationships based on collaboration. It allows stakeholders to understand the risks, impacts and opportunities of a project in order to achieve positive outcomes.

Box 7-1 EBRD Perspective of Stakeholder Engagement

“The EBRD considers stakeholder engagement as an essential part of good business practices and corporate citizenship, and a way of improving the quality of projects. In particular, effective community engagement is central to the successful management of risks and impacts on communities affected by projects, as well as central to achieving enhanced community benefits.”

Source: EBRD (2010)

The main objectives of stakeholder engagement are:

i) To ensure that adequate and timely information is provided to those affected by the project;

ii) To provide these groups with sufficient opportunity to voice their opinions and concerns (see Section 7.7); and

iii) To ensure that comments are received in a timely manner so that they can be taken into account in project decisions.

TAP AG has been engaging with stakeholders in Greece since 2008 for the West section of the pipeline. All levels of authorities, non-governmental organisations, local communities and other

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1 The SEP defines stakeholders as individuals or groups that are affected or likely to be affected (both directly and indirectly) by the project (affected parties) or that may have an interest in the project (other interested parties).

2 While the Greek regulatory framework refers to Environmental Impact Assessment (EIA) only, TAP AG is also looking at the social implications of the Project as per international best practice. Through the Environmental and Social Impact Assessment (ESIA) process TAP AG is able to identify, address, and manage all social, environmental and cultural heritage impacts, risks and opportunities in a systematic and comprehensive manner.

interested parties have been engaged and introduced to the Project, information pertinent to the route selection process has been gathered, specific requirements, expectations and preferences of key stakeholders have been identified, including suggestions relating to any additional or enhancement measures. Engagement has continued across the East section of the pipeline using the same approach and consultation in all areas has been consistent with the following national and international requirements:

- Performance Requirements (PR) of the European Bank for Reconstruction and Development (EBRD);
- UN Convention on Environmental Impact Assessment (EIA) in a Transboundary Context – the Espoo Convention; and
- TAP's corporate standards, including their Code of Conduct.

The full Stakeholder Engagement Plan (SEP), along with a detailed description of each of these requirements can be found in a standalone document- (TAP-FEED-GR-EIA-REP-7018 for TAP Greece West and GPL00-ASP-642-Y-TAE-0007 for Greece East section of the Project route). The SEP is a “living document” which is updated and adjusted as the ESIA progresses and project planning evolves.

This section of the ESIA report summarises stakeholder engagement in support of the ESIA phase. It is divided into the following sections:

- Engagement approach and outcomes of previous phases;
- Main ESIA phase engagement activities;
- Outcomes of main ESIA phase;
- Evaluation of previous engagement effectiveness;
- Grievance mechanism;
- Monitoring and Reporting; and
Next steps.

Since TAP AG initially started engaging with stakeholders in Greece for TAP Greece West, this section will follow a time sequential approach, where Stakeholder Engagement for TAP Greece West will be analysed first followed by Stakeholder Engagement for TAP Greece East.

7.2 Phases of Engagement

7.2.1 TAP Greece West

7.2.1.1 Overview

The process of stakeholder engagement to support the TAP ESIA is being undertaken through 6 phases to ensure a consistent, comprehensive, coordinated and culturally appropriate approach is taken for consultation and project disclosure - refer to Figure 7-1. As shown in the figure, Phases 1 - 4 have been completed and Phases 5 - 6 are planned. The outcomes of Phases 1 - 3 are summarised in Sections 7.2.1.2 to 7.2.1.4. Further detail on the activities undertaken and outcomes of each phase can be found in the SEP (TAP-FEED-GR-EIA-REP-7018).
Figure 7-1  Phases of Engagement

Phase 1- Pre-Scoping:
Strategic engagement with government and key informant groups to provide overall information about the Project, gauge its viability and to identify any key issues early.

Phase 2 – Route Refinement:
Introduce the Project to key stakeholders including national, regional and local authorities and potentially affected communities, to identify any key issues and sensitivities such as sites of interest to be considered in route selection as well as identify any vulnerable groups and gather baseline information.

Phase 3 – Scoping:
Revisit the stakeholders contacted during the Route Refinement phase at a national and regional level, together with those along the chosen route, in order to provide further detail on the Project and generate feedback on the scope, approach, key issues and other stakeholders to be consulted.

Phase 4 – Main ESIA Preparation Phase:
Maintain the relationships developed during the previous phases and ensure all stakeholder issues have been identified. Revisit national and regional authorities and affected communities along the chosen pipeline route to provide a Project update and an opportunity to comment, express any concerns and discuss issues. Also familiarise stakeholders with the grievance mechanism and provide information on the next stages of the Project.

Phase 5 – ESIA Finalisation and Disclosure:
Present stakeholders with the final ESIA report at the end of the ESIA process. Includes providing information on the Project impacts and mitigation measures designed to minimise or, where positive, to enhance them.

Phase 6 – Ongoing Engagement:
Continue to engage with stakeholders throughout the Project lifecycle in order to manage the relationship between TAP AG and stakeholders.

Source: ERM (2012)
It should be noted that in accordance with the law in force at the time of implementing the ESIA studies for TAP Greece West, the process of Environmental Impact Assessment (EIA) in Greece required the following two phases:

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

A Special Environmental Authority within the Ministry of Environment, Energy and Climate Change (EYPE/YPEKA) was in charge of both phases of the EIA process. Consultation during the PEIA phase was limited to national public authorities and the PEIA Study had to be submitted to the Special Environmental Authority (EYPE/YPEKA) for consideration. During the EIA phase, upon completion of the EIA report but prior to approval, the study had to be submitted to the regions involved and was subject to public disclosure. One public disclosure meeting was organised in each region.

The PEIA for TAP Greece West was compiled following the ESIA Scoping Report, filling a similar role in the ESIA process but meeting the specific requirements of Greek environmental legislation at the time. An additional dedicated PEIA consultation phase was thus not considered meaningful as it would have provided no additional value to stakeholders or to the Project and could have contributed to ‘stakeholder fatigue’.

7.2.1.2 Phase 1: Pre-Scoping

Phase 1 was the initial step in launching the Project involving high level strategic engagement with the director and deputy director of the General Directorate for the Environment (Ministry of Environment and Climate Change) in order to provide information about the Project, gauge its viability and identify any key issues early. These meetings were important in order to ensure a common understanding and future support for the Project.

The initial meeting focused around the process of undertaking an Environmental Impact Assessment, ministry review requirements and project standards. The second meeting allowed for further in depth discussions regarding the Project. The key areas of discussion during this meeting are summarised in Box 7-2.
Box 7-2  Phase 1: Outcomes

- Presentation on Project progress in Greece, Italy & Albania
- Suggestion to contact archaeological service of Ministry of Defence & Ministry of Foreign Affairs
- Procedure for EIA study & environmental requirements
- Cross boundary environmental issues
- Compressor stations [NB compressor stations are no longer considered in the Project design for Greece - West]

Source: ERM (2012)

7.2.1.3  Phase 2: Route Refinement

The process of pipeline route selection was undertaken in several iterative stages in a route refinement process. Initially, two main routing corridors, referred to as the Northern Corridor and Southern Corridor were identified within a 50 km wide search area between Nea Mesimvria and the border with Albania. These were determined by consideration of general topography and main constraints such as protected sites, the possibility to bundle with existing infrastructure and technical and logistical considerations.

For each main corridor a number of routes and sub-alternatives were developed aiming at avoiding or minimising interactions with the main environmental, socioeconomic and cultural heritage constraints namely: protected areas, settlements including land use planning and known cultural heritage sites. As a result, a set of routing alternatives was identified.

In a comparative evaluation of these routing options, two routes were identified as the main alternatives:

- The Northern Route $N_1$ (base case); and
- The Southern Route $S_0$.

Phase 2 engagement originally comprised of two stages:

- **Stage 1: Notification to Authorities and Engagement with Key Stakeholders (November 2010 – February 2011)** which involved introducing the Project to national, regional and prefecture level authorities, prior to extending engagement to the municipality and settlement level within both route corridors.

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4 The alternatives assessment study was conducted through a combination of desk top studies and field inspections between Autumn 2010 and Spring 2011.

5 After an administrative reform that entered into force in January 2011 and is referred to as Kallikratis, Greek public administration was reorganised under two main levels: regions and municipalities. The intermediate administrative level between regions and municipalities, that was called prefectures, was repealed by the reform.
- **Stage 2: Verification Activities (June-July 2011)** which involved informing stakeholders of the preferred route and discussing any concerns they may have. This stage was performed jointly with the scoping phase and therefore the outcomes are reported in phase 3 of engagement (Section 7.2.1.4).

During this phase, 12 national level authorities, 8 regional, 14 municipalities, 20 settlement authorities and 3 NGOs were consulted. The main outcomes are summarised in Box 7-3. A detailed analysis of route alternatives is described in the Greece Route Alternatives Appraisal (GPL00-ILF-100-F-TRP-0001).

**Box 7-3 Phase 2: Outcomes of Route Refinement Stakeholder Engagement**

Generally municipalities engaged indicated that they would welcome the pipeline through their municipality in order to realise potential benefits associated with the Project. In particular expectations were expressed about compensation for land and easement acquisition, and the future potential to access gas.

However, representatives of the town of Ptolemaida (mayor and urban planning department) demonstrated some scepticism towards the Project which was driven by previous experience associated with other large developments in the area, particularly with regards to land compensation and employment issues.

During this stage of the Project it was confirmed, through the alternatives appraisal process, that the northern base case route potentially faced fewer challenges in terms of cultural heritage impacts but greater challenges with regards to official planning zones, namely the interactions with Public Power Corporation (PPC) lignite mining concession areas. The PPC were therefore consulted regarding the routing of the pipeline such that the mining area would not be impacted.

Subsequently TAP AG selected the more direct northern pipeline route alternative as the best route to take forward for further planning.

*Source: ERM (2012) Meeting with stakeholders in Molocha settlement*

7.2.1.4 Phase 3: ESIA Scoping

Scoping disclosure and consultation was carried out in June and July 2011. It involved revisiting the government and NGO stakeholders engaged previously during the route selection process at a national, regional and municipal level as well as with representatives of local communities of 11 municipalities crossed by the 2 km corridor of the proposed pipeline route (The Northern Route).

The aim of this phase of engagement was to provide further detail regarding the Project to stakeholders and generate feedback on the scope, approach, key issues and other key stakeholders to be consulted during the ESIA process.
In total, 79 individuals attended meetings held during the scoping phase. Meetings were held with 10 representatives from national level authorities based in Athens, including ministries, governmental agencies and regulators. In addition, a meeting was held in Athens with 3 representatives from national-level NGOs, universities and research organisations. Meetings were also held with 66 representatives from the 11 municipalities and 39 local communities with territory crossed by the 2 km pipeline corridor as well as regional and local NGOs. The five regional and local scoping meetings were organised by TAP AG in Thessaloniki, Koufalia, Ptolemaida, Kastoria and Kozani.

In this phase of engagement, a new route alternative in Western Macedonia was presented passing the LARCO Nickel mine in the south. This route alternative has since been adopted to link with a rerouting to avoid mountainous areas in Albania. The details of this re-routing are described in Section 2.

At the meetings, presentation of the Project and the scoping report was made prior to opening the meeting to questions and comments. Participants were also able to submit follow-up questions and comments through written forms or subsequently send them by post or via the Project web site. Additionally, heads of local communities were provided with materials to inform their communities of the scoping process and inform about the channels of communication back with the Project. Advertisements were also placed in newspapers and on radio stations to help inform community members and other interested parties locally about the Project and the ESIA scoping process and to provide information on the mechanism for submitting their comments.

During this phase of engagement the Project was generally accepted by stakeholders. Its potential for bringing economic growth and development to Greece and in particular the prospect of employment opportunities for communities along the route were mostly appreciated. A number of representatives from government departments offered their support and expertise in providing baseline data on the status of the area and environment to facilitate any impact assessments or better inform the detailed route planning at a later stage.

The main comments raised during the Scoping disclosure meetings are summarised in Table 7-1.
Concerns regarding land acquisition: Detailed questions on procedures for land acquisition, negotiations with landowners and “what if” scenarios were key issues raised in all municipal meetings. The main concern was how TAP AG is going to acquire land if good faith negotiations fail and what will be the legal framework for such acquisitions, as it is a private project (i.e. not owned by the Government of Greece).

Concerns regarding water abstraction for hydro testing: At the regional meeting in Thessaloniki, the representative of the Directorate of Water expressed her concern around water abstraction for hydro testing. She emphasised that quantities, sources, procedure and management of water to be used in the hydro testing of the pipeline should be defined. Additionally, the representatives of Axios-Loudias-Aliakmonas National Park Management Authority expressed their opinion that water abstraction should be from and to equal ecosystems - e.g. no water can be abstracted from the Axios River and later released in Kastoria Lake. Timing of water abstraction is critical. There was a suggestion from the Management Authority of Axios Loudias National Park that best timing is in winter, because the Axios River can provide the quantities needed for hydrotesting.

Concerns regarding natural resources and forests: At the regional meeting in Thessaloniki, the representative of Management Authority of Axios – Loudias - Aliakmonas National Park expressed his concern over the Axios River crossing. Technical details and river crossings should be carefully designed to minimize any damage to riparian vegetation. Representatives from the Forest Directorate of Central Macedonia Decentralized Administration suggested that construction camp sites or pipe yards should be avoided in forested areas.

Compatibility with other infrastructure: One participant asked if the presence of a pipeline in a field is compatible with solar panels. Many farmers in the region have applied for installations of solar panels in their fields. In the Koufalia (Western Macedonia Region) meeting, a representative of the technical departments expressed his concern about potentially higher costs of developing underground pipe networks (e.g water pipes) in the future as they will have to be installed deeper underground due to the presence of the Project.

Options for compressor stations and pollution: One participant in the Kastoria municipality meeting advised that TAP AG should consider installing the meter station close to Kastoria to raise employment opportunities during the Project life time [NB this compressor station site is no longer being considered in the Project design for Greece - West]. Additionally, there was a concern expressed about potential air pollution from the compressor station located in Albania, and how TAP AG is assessing trans-boundary impacts.

Employment opportunities for local communities during the construction period: In all municipal meetings, the issue of employment opportunities for local people during construction and details on how TAP AG is going to ensure that the contractor hires from local communities were key concern. It was also suggested by one community head that not only municipalities but also local communities should be involved in any mechanisms used for workforce selection to help identify those in need of work.

Other benefits in local communities: It was expressed that money from transit fees will never reach municipalities and local communities. A representative of Ptolemaida municipality presented the case of PPC power plants. The local perception is that PPC has not supported local communities and municipalities, despite its long lasting presence in the area. The same representative expressed the idea that TAP AG could potentially sponsor some municipal activities. In his opinion the way of ensuring benefits to local communities should be clearly described and identified early in the project.

Regional frameworks for spatial planning and sustainable development: During the meetings with the regional authorities from both Central and Western Macedonia, it was highlighted that regional frameworks are currently under revision by the Ministry. The procedure might take as long as 3 years to be completed and finalized. If the procedure takes that long, the TAP pipeline will have already obtained an environmental permit and therefore will be included in the regional frameworks. Otherwise, a way to include the Project in the regional frameworks should be established. The authorities suggested following up with the planning directorate of the Ministry of Environment to define appropriate procedures and monitor any developments regarding regional planning.

Source: ERM (2012)
7.2.2 TAP Greece East

7.2.2.1 Overview

The Stakeholder Engagement approach for TAP Greece East is aligned with the process already developed for Greece West with some adjustments – refer to Figure 7-2. The Pre-scoping and Route Refinement phases have been merged to what is called Route Verification Phase, due to the bundling principle that dictates the existing pipeline of DESFA to be followed as much as possible.

Figure 7-2 Phases of Engagement

**Phase 1 & 2 - Route Verification:**
High level strategic engagement with government and key informant groups, to provide information about the Project, gauge its viability and identify any key issues early.

**Phase 3 - Scoping:**
Introduce the Project to key stakeholders including national, regional and municipal authorities, as well as NGOs and other interested parties, to inform them about the route selection and generate feedback on the scope, approach and key issues.

**Phase 4 - Main ESIA Phase:**
Maintain the relationships developed during the previous phases by continuing to engage national, regional and municipal stakeholders as well as local affected communities along the chosen pipeline route to provide a Project update and an opportunity to comment, express any concerns and discuss issues. Also familiarise stakeholders with the grievance mechanism and provide information on the next stages of the Project.

**Phase 5 - Integrated ESIA Finalisation and Disclosure:**
Present stakeholders with the final Integrated ESIA report at the end of the ESIA report preparation process. Includes providing information on the Project impacts and mitigation measures designed to minimise or, where positive, to enhance them.

**Phase 6 - Ongoing Engagement:**
Continue to engage with stakeholders throughout the Project lifecycle in order to manage the relationship between TAP AG and stakeholders.

As shown in Figure 7-1, phases 1 to 4 have been completed and phases 5 to 6 are planned. The outcomes of the first three (3) phases are summarised in Sections 7.2.2.2 to 7.2.2.3. Further detail on the activities undertaken and outcomes of each phase can be found in the SEP for TAP Greece East (GPL00-ASP-642-Y-TAE-0007).

According to the new Greek National Law 4014, a Preliminary Environmental Impact Assessment (PEIA) is no longer applicable and an Environmental Impact Assessment (EIA) should be submitted to the Special Environmental Authority within the Ministry of Environment, Energy and Climate Change (EYPE/YPEKA). The Special Environmental Authority is in charge of the EIA process.

The new National Law 4014 article 19 authorises the issuance of a new JMD (Joint Ministerial Decision) for detailing public consultations and disclosure processes for all projects. Before this decision is enforced, the previous legislation is applied. Based on the previous legislation, public consultation during the ESIA process in Greece is based on JMD 37111/200 authorised by Law 3010/2002 on harmonization of L.1650/1986 with Directives 97/11/EC and 96/61/EC.

It should be noted that the new Law 4014/2011 introduces a voluntary step of Preliminary Determination of Environmental Requirements (equivalent to Scoping Report). According to Article 2, the owner of a project may perform public consultation and disclosure presenting the basic technical characteristics of the project and its main environmental impacts. The aim of the PDER is to facilitate the Competent Authority to provide guidelines/ directions on various issues of the ESIA, after receiving feedback from relevant stakeholders. These guidelines refer to (i) any additional alternatives, (ii) any special study that the stakeholders deem necessary to be performed and the methodology for these studies, (iii) any issues that request special attention, (iv) a list of stakeholders that will be consulted, and (v) any other specific guidelines that need to be followed for the full ESIA.

For projects classified as A1 (according to MD 1958/2012), such as the TAP project, the process of PDER is defined in Article 3 of Law 4014/2011. In short, the stages of the PDER process are summarized below:

1. Completeness check by the Competent Authority (i.e. MEECC/SEA)
2. Review of the report by the statutory authorities, as determined by the Competent Authority
3. Assessment of responses from the authorities’ and

4. Issuance of Statement.

The law requires consultation during the Scoping phase to be carried out with national, regional and municipal public authorities. The Scoping Report should be submitted to the Special Environmental Authority of the Ministry of Environment, Energy and Climate Change (MEECC/SEA) for consideration. During the EIA phase, when the EIA is complete but prior to approval, the study is submitted to the regions involved and is subject to public disclosure. One public disclosure meeting is organised in each region.

7.2.2.2 Phase 1 & 2: Route Verification

As already mentioned in Section 7.1, TAP AG has been engaging with stakeholders in Greece since 2008 for the West section of the pipeline. The approach to engagement process for the East section of the Project is similar to the West section with some adjustments. The Pre-scoping and Route Refinement phases have been merged to what is now called the Route Verification phase in terms of stakeholder engagement, due to the bundling principle that dictates the existing pipeline of DESFA to be followed as much as possible.

The purpose of the Route Verification phase for TAP Greece East was to confirm whether it would be possible to bundle the base case corridor with the existing natural gas pipeline across the eastern part of Northern Greece, starting from the area of Kipoi (near the Turkish border) and extending to the area of Thessaloniki, near Nea Mesimvria. Additionally, five (5) local alternative routes\(^6\) were assessed, mainly to investigate improvement of the base case corridor, avoid local constraints and minimize impacts to the environment.

Implementation of the Bundling Infrastructure Principle meant that stakeholder engagement during the Route Verification phase comprised two stages:

i) **ESIA related technical issues stage** which involved introducing the East section of the Project to two key stakeholders, MEECC/YPEKA and DESFA, to clarify issues regarding structure of the integrated ESIA, alternative assessment and technical feasibility of the bundling principle. The key areas of discussion during these meetings are summarised in Box 7-4.

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\(^6\) The local alternative corridors study was conducted through a combination of desktop studies and field inspections between August and November 2012.
Box 7-4  Phase 1: Stage 1 – Outcomes

- Information about TAP shareholders’ decision to extend the Project towards the East
- Clarification on a single Scoping Report for TAP East instead of an Integrated Scoping Report West and East
- Integrated ESIA report (West and East) requirements and clarifications
- Clarification on local alternatives
- Legal obligations for safeguarding the ITGI (Interconnector Turkey Greece Italy) route – there are no obligation until the issuance of the approved environmental terms according to law 4014/11
- River crossings
- Safety distance restrictions between pipelines and/or facilities for construction and operation phase
- Compressor stations

Source: ASPROFOS (2012)

ii) **Constraint Data Collection stage** which involved presenting the overall TAP Project, consulting stakeholders of the base case route and identifying environmental, social and cultural heritage sensitivities. This stage comprised a series of correspondence and data collection meetings at national, regional and municipal level. Six (6) national, sixty seven (67) regional and three (3) municipal level authorities7 were consulted. Data collected were included in the database of the constraints maps which in turn assisted the base case route and local alternatives verification process. A detailed analysis of the route verification process is described in the Greece East Route Verification Report (GPL00-ENT-100-F-TRP-0004).

7.2.2.3 Phase 3: ESIA Scoping

Scoping disclosure and consultation in Greece East section was carried out in December 2012. It involved meeting with national, regional and municipal level authorities as well as with representatives of local communities of 23 municipalities crossed by the 1 km or 2 km corridor8 of the proposed pipeline route, as well as NGOs and other interested parties. The aim of this phase of engagement was to consult stakeholders about the route selection and project design and to understand any issues which may inform the ESIA Terms of Reference and the development of mitigation measures for the project.

7 After an administrative reform that entered into force in January 2011 and is referred to as Kallikratis, Greek public administration was reorganised under two main level: regions and municipalities. The intermediate administrative level between regions and municipalities, that was called prefectures, was repealed by the reform.

8 1 km corridor for the pipeline corridor running parallel to the existing pipeline network and 2 km for the pipeline corridor deviating from the existing Greek pipeline network.
In total, 111 individuals attended meetings organised during the scoping phase. Meetings were held with 13 representatives from national level authorities based in Athens, including ministries, governmental agencies and regulators. In addition, a meeting was held in Athens with representatives of national-level NGOs and research organisations. Finally, 95 representatives from the 23 municipalities and 65 local communities located within the 1 or 2 km pipeline corridor as well as regional and local NGOs and other interested parties attended the seven (7) scoping meetings organised by TAP AG in Thessaloniki, Serres, Kavala and Alexandroupoli.

At the meetings, a presentation of the Project and the scoping report was made prior to opening the meeting to stakeholder questions and comments. Participants were also able to submit follow-up questions and comments through written forms or subsequently by sending them via post or the Project web site. Additionally, heads of local communities were provided with printed materials to inform their communities of the scoping process and inform them about the channels of communication back with the Project. Media announcements were also placed in national and regional newspapers to help inform community members and other interested parties locally about the Project and the ESIA scoping process and to provide information on the mechanism for submitting public feedback. An evaluation of engagement was also carried out at the end of every meeting.

From the initial phases of the stakeholder engagement and in particular during the scoping disclosure phase, the Project was generally well accepted by all stakeholders. People mainly anticipate and look forward to the Project's potential for economic growth and development in Greece and especially for the prospect of local employment opportunities. However, a number of representatives from the regional and municipal authorities, including the local communities, expressed their scepticism towards the Project, which could result of less extensive stakeholder engagement in other similar infrastructure projects in the past.

The main comments raised during the meetings are summarised in Table 7-2.
**Table 7-2  Phase 2: Outcomes**

**Issue Raised**

**Acceptance of the proposed Project:** The Project has been in general accepted by the majority of stakeholders based on the expectation that it will bring economic growth and development to Greece and in particular due to the prospect of employment opportunities for communities along the route.

**Concerns regarding land acquisition and compensation:** At most of the meetings questions were asked about the procedure for expropriation especially if negotiations failed and compensation in particular associated with the loss of the intrinsic value of land due to restrictions on development (examples included buildings and solar panels). TAP stressed that all losses would be assessed and that compensation would be defined in a transparent manner and according to international best practice.

**Concerns regarding natural resources and protected areas:** Crossing of the Strymonas River should be carefully designed to avoid damaging riparian vegetation; in addition locating camps or pipe yards in forested areas should be avoided. Clarifications on the technique to be used by TAP AG to avoid impact on the riverbed environment and the landscape were also asked.

**Employment opportunities for local communities during the construction period:** TAP AG should develop mechanisms to ensure that local workforce is employed by contractors for the Project.

**Other benefits in local communities** The concern was expressed that money from transit fees will never reach municipalities and local communities. The community representatives asked for compensative benefits that will be part of the social investment plan of the Project.

**Safety distance between the two pipelines:** A number of representatives raised the issue about safety issues and appropriate measures to be taken in areas where the two pipelines are placed in parallel.

**Concerns regarding sites of archaeological interest:** The stakeholders referred to a number of archaeological sites in proximity to the pipeline route which need to be taken into account as places of cultural heritage and special interest.

**Concerns regarding water abstraction for hydro testing:** Concerns were raised regarding water abstraction for hydro testing. Sources, procedure and management of water to be used for hydro testing of the pipeline should be identified, so that abstracting and discharging water in sensitive water bodies is avoided.

**Landscape reinstatement:** Concerns were expressed regarding the ways and the necessary length of time for full reinstatement of the landscape, upon the completion of construction works.

*Source: APROFOS (2013)*
7.3 Main ESIA Engagement Activities

7.3.1 Objectives

The objective of this phase of stakeholder engagement was to complement the scoping engagement held in June - July 2011 for Greece West and in December 2012 for Greece East to ensure that stakeholders had an opportunity to learn about the Project, ask questions and raise concerns. The engagement was also used to gather information that was relevant for assessing impacts and the development of mitigation measures. The Project team also ensured that stakeholders were familiar with the Project’s Grievance Mechanism and have information on the next phases of the Project.

This phase of engagement focused at the local level only, consulting with representatives at municipalities, heads of communities and the public of potentially affected settlements.

7.3.2 Stakeholder Identification

The SEP (TAP-FEED-GR-EIA-REP-7018 for TAP Greece West and GPL00-ASP-642-Y-TAE-0007 for Greece East section of the Project route) defines stakeholders as ‘individuals or groups that are affected or likely to be affected (both directly and indirectly) by the project (the so-called “affected parties”) or that may have an interest in the project (“other interested parties”))⁹. The process also aims to identify which stakeholder may have a positive or negative impact or influence on the project.

Stakeholder identification has been an ongoing process, which has evolved as the route has been refined and settlements identified. Different issues are likely to concern different stakeholders. Therefore, stakeholders have been grouped based on their connections to the Project. Having an understanding of the connections of a stakeholder group to the Project helps identifying the key objectives of engagement.

*Table 7-3* presents the stakeholders who were identified as relevant for the main ESIA phase for both sections of the Project. A full list of stakeholders consulted and associated meetings held during this phase, is provided in *Annex 7.1*.

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⁹ Definition according to EBRD Performance Requirements (PR) 10 *Information Disclosure and Stakeholder Engagement* (point 8)
### Stakeholder Groups

<table>
<thead>
<tr>
<th>Stakeholder Group</th>
<th>Connection to the Project</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Affected Parties</strong></td>
<td></td>
</tr>
<tr>
<td><strong>TAP Greece West</strong></td>
<td>Will experience impacts (positive or negative) as a result of the Project realization.</td>
</tr>
<tr>
<td>Settlements, including community heads within the 2 km corridor – 37.</td>
<td>May have expectations regarding development and benefits in their local area.</td>
</tr>
<tr>
<td>Settlements that have land within the 2 km corridor but are based outside and those who may be affected by Project facilities (e.g. camps, yards etc.) – 15.</td>
<td>Provide information regarding the local community that will enable the identification of potential impacts and mitigation measures as well as identify community needs.</td>
</tr>
<tr>
<td>Focus groups (including vulnerable groups&lt;sup&gt;10&lt;/sup&gt;) within the 2 km corridor:</td>
<td></td>
</tr>
<tr>
<td>• Women*</td>
<td></td>
</tr>
<tr>
<td>• Elderly*</td>
<td></td>
</tr>
<tr>
<td>• Farmers*</td>
<td></td>
</tr>
<tr>
<td>• Economic immigrants – Albanian*</td>
<td></td>
</tr>
<tr>
<td>• Local Industry</td>
<td></td>
</tr>
<tr>
<td>• Roma</td>
<td></td>
</tr>
<tr>
<td><strong>TAP Greece East</strong></td>
<td></td>
</tr>
<tr>
<td>Settlements, including community heads within the 1 km corridor, where pipeline going parallel to the existing pipeline – 42</td>
<td></td>
</tr>
<tr>
<td>Settlements, including community heads within the 2 km corridor, where pipeline not going parallel to the existing pipeline - 21</td>
<td></td>
</tr>
<tr>
<td>Focus groups (including vulnerable groups) within the 1 or 2 km corridor:</td>
<td></td>
</tr>
<tr>
<td>• Women*</td>
<td></td>
</tr>
<tr>
<td>• Elderly*</td>
<td></td>
</tr>
<tr>
<td>• Farmers*</td>
<td></td>
</tr>
<tr>
<td>• Local Industry</td>
<td></td>
</tr>
<tr>
<td>• Pomaks</td>
<td></td>
</tr>
<tr>
<td>• Roma*</td>
<td></td>
</tr>
<tr>
<td>• Repatriated Greeks</td>
<td></td>
</tr>
<tr>
<td>Greek Muslims</td>
<td></td>
</tr>
<tr>
<td><strong>Other interested parties</strong></td>
<td></td>
</tr>
<tr>
<td>Authorities and institutions:</td>
<td>Representatives of the settlements/municipalities being consulted.</td>
</tr>
<tr>
<td>• Heads of municipalities</td>
<td>May have expectations regarding development and benefits for the country or in the local area.</td>
</tr>
<tr>
<td>• Heads of local communities</td>
<td></td>
</tr>
<tr>
<td>Key Informants:</td>
<td>May have expectations regarding development and benefits to the country or to the local area.</td>
</tr>
<tr>
<td>• Agencies responsible for service provision (health and education)</td>
<td>Solicit specific information regarding the local community that will support identification of potential impacts and mitigation measures as general community needs.</td>
</tr>
<tr>
<td>• Agencies responsible for economic sectors (urban planning/local development, hunting, fishing, labour, forestry)</td>
<td></td>
</tr>
</tbody>
</table>

*Source: ERM (2012) and APROFOS (2013)*

<sup>10</sup> The vulnerable groups are highlighted with an asterix.
7.3.3 Engagement Activities

Various types of engagement were conducted to ensure that information regarding the Project was disseminated to all stakeholders, including vulnerable groups. The various types of engagement for each section of the Project are analysed below. Additional information on the methodology used for data collection during the ESIA phase is presented in Annex 6.3.

7.3.3.1 TAP Greece West

Settlement meetings were performed within the 2 km corridor to provide information about the Project, to discuss impacts and mitigation measures and to answer questions and understand concerns of those who will be most affected by the Project. A few settlement meetings were also held outside the corridor due to their potential ownership or use of land inside the corridor.

Focus group discussions and key informant interviews were performed primarily to collect baseline data but also to act as a forum for these groups to communicate their opinions and concerns regarding the Project. This included potentially vulnerable groups such as women, minorities and the elderly.

The main ESIA engagement activities for Greece West were undertaken in September 2011. Meetings were organised with the support of national and regional authorities and heads of communities. Additionally, a media campaign was coordinated by TAP AG’s office in Greece as described in Box 7-5.

### Table 7-4 Meetings Summary

<table>
<thead>
<tr>
<th>Meeting Type</th>
<th>Number of Participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>42 Local level meetings across 9 municipalities and 41 settlements (4 outside the 2 km corridor)</td>
<td>830</td>
</tr>
<tr>
<td>29 Focus groups (1 outside the corridor)</td>
<td>198</td>
</tr>
<tr>
<td>24 Key informant interviews (2 outside the corridor)</td>
<td>24</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,052</strong></td>
</tr>
</tbody>
</table>

*Source: ERM (2012)*
Figure 7-3 Pictures of Meetings

Pics: Top left – Settlement meeting in Parthenion (Chalkidona municipality, Central Macedonia); top right – Settlement meeting in Ano Grammatiko (Edessa municipality, Central Macedonia); bottom left – Settlement meeting in Krepani (Kastoria municipality, Western Macedonia); bottom right – Settlement meeting in Droseron (Eordea municipality, Western Macedonia).

Source: ERM (2012)

Box 7-5 Main ESIA Engagement: Media Campaign

- 2 weeks prior to consultation, adverts were placed in 4 northern based newspapers (published twice – 1 per week): “Odos”, “Ptolemaicos”, “Paratiritis” and “Makedonia”.
- The same adverts were announced on the regional radio stations: Radio Almopia, Radio Agapitos, Pella FM, Radio Kastoria and Antennes FM.
- Consultation posters were sent to heads of the local communities prior to the consultation, who distributed them to community members. Posters were also placed in public places by TAP AG representatives 2-3 days in advance of the meetings. Meetings were only held in the evening following the request of the local communities, in order to maximise the possibility that people could attend.

Picture: Poster advertising settlement meeting at Kato Grammatiko (Edessa municipality, Central Macedonia)
Source: ERM (2012)
7.3.3.2 TAP Greece East

Settlement meetings were performed within the 1 km corridor of the base case route where the proposed pipeline corridor runs parallel to the existing pipeline network and within the 2 km corridor of the base case route where the corridor deviates from the existing Greek pipeline network. As with Greece West, the aim of the meetings was to provide information about the Project, discuss impacts and mitigation measures and answer questions and understand concerns of those who will be most affected by the TAP Project.

As in the East section, focus group discussions and key informant interviews were performed primarily to collect baseline data, but also to act as a forum for these groups to communicate their opinions and concerns regarding the TAP Project back to its developers. This included potentially vulnerable groups.

The main ESIA engagement activities for Greece East were undertaken in January 2013. Meetings were organised with the support of regional authorities and heads of communities. Additionally, a media campaign was coordinated by TAP AG’s office in Greece as described in Box 7-6.

**Box 7-6 Main ESIA Engagement: Media Campaign**

- Media announcements were placed in five regional and local newspapers approximately **three to seven days** before the meetings: “Macedonia”, “Elefthero Vima”, “Thraki Newspaper”, “Foni tou Nestou” and “o Chronos”. Indication of where the Non-Technical Summary of the ESIA Report could be downloaded from the Internet was also included in the announcement. The same adverts were announced on regional radio station “Foni tou Nestou”.

- Project Leaflets were distributed to heads of the local communities during the scoping disclosure meetings in December 2012 to further distribute them to community members prior to main ESIA consultations.

- Consultation Posters were placed in public places by TAP AG representatives 2-3 days in advance of each meeting. Most of the meetings were held in the evening following the request of the local communities, in order to maximise the possibility of people’s attendance.

*Pictures: Poster advertising settlement meeting at Assiro and Lachanas (Lagada municipality, Central Macedonia)*
*Source: ASPROFOS (2013)*
During the main ESIA phase of stakeholder engagement a total of 1936 participants were consulted during 199 consultation events. Table 7-5 provides a summary of the meetings held and the number of participants. A full listing is provided in Annex 7.1.

### Table 7-5: Meetings Summary

<table>
<thead>
<tr>
<th>Meeting Type</th>
<th>Number of Participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>65 Local level meetings across 18 municipalities and 64 settlements</td>
<td>1,333</td>
</tr>
<tr>
<td>88 Focus groups</td>
<td>551</td>
</tr>
<tr>
<td>46 Key informant interviews</td>
<td>52</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,936</strong></td>
</tr>
</tbody>
</table>

*Source: ASPROFOS (2013), EXERGIA (2013)*

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11 The meeting’s summary table includes meetings held in 5 communities in Paggaio municipality and 1 community in Kavala municipality that are no longer located within the pipeline corridor after a re-route in the turf area.
7.3.4 Format of Consultation Meetings During the Main ESIA Phase

Consultation meetings involved presentation of the Project followed by a question and answer session. Focus groups and key informant interviews were guided by a Question and Answer template to enable targeted discussions about specific topic areas for baseline data collection. However, as mentioned earlier, these types of meetings also offered an opportunity to provide information regarding the Project and use satellite and route maps as a trigger for participants to further engage in the ESIA process.

Meetings were held in a variety of locations such as community coffee shops, municipal offices and community social areas.

A description of all the communication materials used for the main ESIA consultation for both sections of the Project are summarised in Table 7-6.

<table>
<thead>
<tr>
<th>Material</th>
<th>Description</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Power Point Presentation</td>
<td>Presentation of the ESIA process, Project description, Project progress to date, future Project plans, timeframes, expected impacts and mitigation measures.</td>
<td>Consult on impacts and disclosure of mitigation measures.</td>
</tr>
<tr>
<td>A3 map books</td>
<td>Detailed aerial maps of the Project route sections to use as visual aids at stakeholder meetings.</td>
<td>To provide visual orientation and facilitate discussions with stakeholders attending the meetings.</td>
</tr>
<tr>
<td>Project Leaflet</td>
<td>Two page leaflet in Greek summarising the project, the ESIA process and future Project plans. Also provides contact details for TAP AG.</td>
<td>Allow stakeholders to take information home and have TAP AG contact details for later comments or questions.</td>
</tr>
<tr>
<td>Poster</td>
<td>Large-format posters with information on the Project to utilise during the community meetings and following discussion.</td>
<td>Present stakeholders with project information; promote questions and feedback.</td>
</tr>
<tr>
<td>LEA Leaflet</td>
<td>Five page leaflet in Greek summarising the land and easement acquisition process developed by TAP AG.</td>
<td>Allow stakeholders to take information home and have TAP AG contact details for any grievances or queries.</td>
</tr>
<tr>
<td>Q&amp;A</td>
<td>A double-sided sheet of frequently asked questions about the Project.</td>
<td>A guide for consistently providing stakeholders with additional Project information.</td>
</tr>
<tr>
<td>Newspaper and radio Advert</td>
<td>Newspaper and radio adverts informing communities of the date, time and location of consultation meetings.</td>
<td>To ensure that stakeholders are aware in advance of meetings.</td>
</tr>
</tbody>
</table>


The LEA Leaflet was only distributed during consultation for TAP Greece East, because by this time the Land and Easement Acquisition process has reached a level of agreement with the various stakeholders.
7.4 Outcomes of Main ESIA Engagement Phase

7.4.1 Key Issues Raised

In general, community members who attended meetings had an expectation that the Project would contribute to economic development, would provide local employment opportunities and would open the possibility for gas supply in the directly affected areas. However, a number of participants expressed a degree of distrust towards the Project and in general did not consider that their communities or households would benefit from it. There was common reference to the current political and economic climate as well as poor previous experiences from other infrastructure projects, and it was apparent that this context had a significant influence on their views and perceptions.

The issues raised by community members and other stakeholders can been broadly categorised into the following areas. These issues are described further in Annex 7.2 summarising the comments and questions raised and addressed in Section 8.

- **Loss of livelihoods and compensations:** Impacts to land-based livelihoods and the compensation that landowners might receive were a key area of concern. Issues such as depreciation of land and restrictions to building were raised. Many participants were also concerned about fair compensation in highly productive areas and expressed their previous experiences with land compensation from other major infrastructure projects.

- **Other impacts and their management:** There was scepticism regarding the management of potential impacts and a number of questions were raised in this regard. Examples include: irrigation, disruption to access routes, land reinstatement, soil quality, hydrotesting water discharge, potential contamination of water resources, noise and disturbance, interaction with local development areas, cultural heritage and impacts to forestry.

- **Project benefits:** Many stakeholders asked questions regarding benefits that they might receive from the Project, in particular they expressed a wish that a percentage of the taxes received by the Greek state from the Project to be transferred from state budget directly to the local community; as well as enquired about the potential community investments by TAP AG

- **Purchase of gas:** A stakeholder wish for the Project to provide access to gas was stated at almost every meeting.

- **TAP Project:** A diverse range of questions was raised to gain further clarity on aspects of the Project, particularly around the technical aspects of the pipeline, including its depth and
similarities to the existing national gas pipeline and construction techniques. There were questions about pipeline routing and location of compressor stations. The standards that the Project would apply were also a common focus of interest.

- **Employment:** Given the current economic climate in Greece, many stakeholders were interested in opportunities available to the local community and industry.

- **Health and Safety:** There was some concern about health and safety implications of the gas pipeline, especially with regard to explosions and the depth of the pipeline.

- **Stakeholder engagement and information disclosure:** In general stakeholders were keen to remain informed about the Project and be able to provide further views as Project plans develop.

- **Government Role:** A small percentage of stakeholders expressed concern about the capacity of the government to regulate the Project effectively to ensure that standards are upheld and that the employment process is transparent. Stakeholders were also interested in how revenues levied from the Project would be shared at the local level.

7.4.2 Variability of Issues of Concern along the Pipeline Route

The issues of concern raised along the pipeline route are analysed below, separately for West and East sections of the Project.

7.4.2.1 TAP Greece West

As shown in *Figure 7-5*, livelihoods and compensation was raised most often (25%) followed by details of the Project (22%). The frequency of these issues raised is further broken down in the table below which presents the types of issues raised per district. The following paragraphs elaborate on these issues and specific topics of concern.
Figure 7-5  Issues raised

- Loss of Livelihoods & Land Compensation: 8%
- TAP Project: 5%
- Impacts & their Management: 1%
- Purchase of Gas: 11%
- Health & Safety: 10%
- Potential Benefits: 11%
- Stakeholder Engagement & Information Disclosure: 22%
- Employment: 1%
- Government Role: 25%

Source: ERM (2012)
The types of issues raised are reflective of the socioeconomic conditions of the settlements along the proposed route as described in Section 6 of the ESIA (Socioeconomic Environment). The
main issues raised per district and within each municipality are summarised and Figure 7-6

**Figure 7-7**

In summary:

- Loss of livelihoods and land compensation was of particular concern in the Municipalities of Pella (37%), Skydra (33%), Naousa (43%) and Eordea (31%). This is related to the high level of profitable agricultural productivity in these municipalities, especially cultivation of peach trees in the central part of the route. Annual crops are also particularly prominent in Eordea towards the western part of the route. Communities are consequently concerned about how TAP AG will compensate for the time and financial investments they have made in their lands as well as restrictions to land use, including building restrictions, and depreciation of land. For example, during community meetings in Pella and Skydra the locals mentioned that they may want to sell their land for industrial purposes and that TAP AG is taking these types of opportunities away from them, especially due to the current climate. Additionally, in Eordea there was particular concern for depreciation of land due to planting restrictions right about the pipeline.

- In other areas technical details regarding the Project were more, or equally as important as land loss and compensation such as in Amyntaio (38%), Orestida (33%), Kastoria (26%), Chalkidona (19%) and Edessa (17%). Consultees were concerned with such details of the Project as the depth of the pipeline, construction methods and the exact route.

- Many consultees raised concerns about a variety of Project impacts, particularly in Pella (20%) where most questions were regarding impacts on irrigation and boreholes as well as reinstatement of land and impacts on fertile soil. In Edessa (17%) and Kastoria (15%) there was concern for forest degradation and its impact the natural environment, such as oxygen levels and scenery.

- There were a number of questions raised about the potential for benefits and local investments made by the Project. Although categorised separately in the analysis of results as presented in **Figure 7-5**, the possibility of access to gas and employment were seen as benefits and consultees felt that if these opportunities were not available, there would consequently be no benefits. This is reflective of the last bullet point below relating to scepticism and negativity based on the current climate and past experience with other infrastructure projects. It was suggested that access to gas would improve the quality of life by providing a cheaper source of energy for heating, especially for greenhouses in Pella and Skydra, as well as reduce pressure on forests. Employment is currently a prominent issue in Greece with 32.9% of the 15-24 year olds unemployed (see Table 6-70 in the socioeconomic baseline (Employment Data for Greece)), and therefore questions were raised regarding the number of employment opportunities and types of jobs available.

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13 A full list of the issues has been recorded in the stakeholder engagement log for the purpose uploading to the TAP Stakeholder and Consultation Database.
Health and safety was also commonly raised as a concern, particularly in Edessa (24%) and Naousa (21%). Key issues raised regarding this category were related to the pressure of gas and how the block valve stations would prevent gas explosions and leaks. Additionally communities were concerned about how the emergency cases would be managed.

Other points of discussion included the stakeholder engagement process and the government’s role, in particular how TAP AG would manage opposition to the Project. In many cases there were strong feelings of resentment and scepticism towards the government and its ability to effectively manage such large projects. The current economic situation is also contributing to the general feeling of anxiety and negativity. Additionally, consultees were concerned about the government’s involvement in the Project, especially in the compensation process as well as the use of funds raised from the Project.
**Key Issues: Pella & Skydra Municipality**

**Loss of livelihoods, land compensation & depreciation:** Mountainous forested area with people mainly involved in logging and agricultural activities. Concerns raised regarding compensation for forest degradation and loss of land. Additionally, questions were raised regarding the loss of vegetation in the construction strip.

**Project impacts:** Concerns raised regarding the management of forest degradation. There was also concern that fences during construction would restrict the movement of domestic animals.

**Health and safety:** Concerns that the gas may be radioactive. Other concerns were raised such as gas leakages, explosions, and response in a case of an emergency such as an earthquake.

**Potential benefits & access to gas:** Queries regarding potential opportunities from the Project such as new roads in Kato Grammatikon and other road improvements aiding emergency response to wild fires. Questions relating to access to gas were also raised.

**Employment:** Questions regarding the employment numbers and opportunities available. Suggestion that professional local loggers could be employed to clear the working strip.

---

**Key Issues: Edessa Municipality**

**Loss of livelihoods, land compensation & depreciation:** Due to extensive peach cultivation being the main economic activity and time and financial investments made, there were concerns raised regarding the compensation process and depreciation of land.

**Project impacts:** Concerns raised regarding the management of forest degradation. There was also concern that fences during construction would restrict the movement of domestic animals.

**Health and safety:** Concerns that the gas may be radioactive. Other concerns were raised such as gas leakages, explosions, and response in a case of an emergency such as an earthquake.

**Potential benefits & access to gas:** Queries regarding potential opportunities from the Project such as new roads in Kato Grammatikon and other road improvements aiding emergency response to wild fires. Questions relating to access to gas were also raised.

**Employment:** Questions regarding the employment numbers and opportunities available. Suggestion that professional local loggers could be employed to clear the working strip.

---

**Key Issues: Naousa Municipality**

**Loss of livelihoods, land compensation & depreciation:** Due to extensive peach cultivation being the main economic activity and time and financial investments made, there were concerns raised regarding the compensation process and depreciation of land.

**Project impacts:** Underground irrigation systems should be avoided during the summer to avoid damage to crops.

**Health and safety:** Concerns regarding explosions and what would happen to the pipeline in the case of an earthquake.

**Potential benefits & access to gas:** Queries regarding potential opportunities from the Project such as new roads in Kato Grammatikon and other road improvements aiding emergency response to wild fires. Questions relating to access to gas were also raised.

**Employment:** Questions regarding the employment numbers and opportunities available. Suggestion that professional local loggers could be employed to clear the working strip.

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**Key Issues: Chalkidona Municipality**

**Loss of livelihoods, land compensation & depreciation:** Concerns regarding the impact on high value agricultural productivity, especially on vineyards in Nea Mesimvria. Questions were raised about the compensation process and the involvement of the government. There is fear that land will not be restored to its original condition and that fair compensation will not be provided. Depletion of land and building restrictions were also an issue in the municipality.

**Project impacts & development plans:** Due to the fact that pipeline crosses irrigation channels which irrigate areas outside the construction zone, concerns were raised about how this would be managed. There are approved plans to expand Gefira community.

**Health and safety:** Concerns that the pipeline will not be deep enough to cater for 80cm ploughs. Additionally, there was mention of health impacts related to water quality due to high levels of groundwater in the municipality. Gefira expansion plans head towards pipeline corridor and there were questions regarding the safety distance and if the plans should be frozen until the TAP Project is completed. Was also mentioned that Parthenion floods in the winter.

**Legacy issues & project opposition:** Negativity towards the Project due to the DESFA metering and regulation station, which has caused noise and air emissions, and plans for TAP to construct a compressor station. A general feeling of mistrust due to the current economic situation and legacy issues.

**Employment opportunities & potential benefits:** Due to high unemployment, questions were raised about potential benefits and job opportunities. There were suggestions for ways in which benefits could be implemented including use of materials left from trenching and use the waste heat from the compressor station to heat neighbouring communities.
Stakeholder Voices

- There is difference between different areas regarding land productivity. How are you going to compensate for 40 years? You have to take into account the fertility and productivity of the land. – Settlement meeting in Loutrochorion (Skydra municipality)
- The area south of Nea Mesimvria is a rich agricultural area with vineyards and other valuable products. The existence of the pipeline will reduce its value. – Settlement meeting in Nea Mesimvria (Chalkidona municipality)
- The boreholes and the pumps may be destroyed and they are very expensive to build. Furthermore, according to the law we will not be permitted to build anymore. A lot of trees will be destroyed that will take much time to be replanted and give fruit. Expensive varieties of cherries may be destroyed too. – Settlement meeting in Liparon (Pella municipality)
- The depth of 1m for the pipeline is not enough. Rice cultivations require deep ploughing. – Settlement meeting in Koufalia (Chalkidona municipality)
- What will be the procedure for reinstating the topsoil when the trench is filled in following construction? How can TAP guarantee that topsoil (the highest quality soil) would be reinstated at the surface so that we can continue to use the land for farming. – Settlement meeting in Agios Loukas (Pella municipality)
- If roads are destroyed during construction, will the company promise to restore them? Previous construction projects in the area have degraded roads during construction and never repaired them. – Settlement meeting in Liparon (Pella municipality)
- There is pollution by the hellenic gas transport system operator (DESFA’s facilities (noise and odours). We don't want anything similar built here. – Settlement meeting in Aghialos (Chalkidona municipality)
- People will not consider to relocate to this area, because of the many pipeline projects, and this will have a negative impact to the community. The area will be seen as dirty and be unpopular for holidays. – Settlement meeting in Nea Mesimvria (Chalkidona municipality)
- The farmers are positive towards the Project on the condition that they get gas. We would find it very useful because there are many green-houses need heat and oil is very expensive. - Farmer focus group in Aspron (Skydra municipality)
- What happens if there is an earthquake? – Settlement meeting in Polla Nera (Naousa municipality)
- If there is a gas leak, will this cause a problem for the community? – Settlement meeting in Liparon (Pella municipality)
- It would be good to improve the roads in this area - we have problems with road infrastructure. – Settlement meeting in Kato Grammatiko (Edessa municipality)
- Has the company thought of using the waste heat from the compressor station to heat neighbouring communities (district heating)? – Settlement meeting in Gefira (Chalkidona municipality) [NB compressor stations no longer being considered in the Project design for Greece - West].
- Will there be any material left from trenching? Where will it be disposed of? We can show you areas where it is needed. – Settlement meeting in Gefira (Chalkidona municipality)
- If the village provides space for storage of equipment or land for a block valve station, will the village receive benefits for this? – Settlement meeting in Kalivia (Skydra municipality)
- We suggest that when you cross forest areas in the area, you hire local residents - we are professional loggers. – Settlement meeting in Ano Grammatikon (Edessa municipality)
- Unemployment is a major concern here and we would like jobs if the project passes through our area. – Settlement meeting in Aghialos (Chalkidona municipality)
- What is the status of governmental negotiations regarding the Project in Greece? – Settlement meeting in Polla Nera (Naousa municipality)
**Figure 7-5 Stakeholder Issues Map - Western Macedonia**

**Key Issues: Kastoria Municipality**

**Loss of livelihoods, land compensation & depreciation:** Request that the project consider time to regain productivity in the compensation process. Some scepticism that the compensation will be unfair due to past time and experience related to the Egnatia highway project where people have allegedly been waiting 5 years. Concerns regarding building restrictions in the 60 metre zone, such as solar panels or hotels, and depreciation of land especially where people own small land plots.

**Project impacts:** Irrigation is through boreholes and concerns were raised regarding impacts and restoration of these. In Kastoria it was stressed that the forest should be avoided as this was planted themselves to create natural beauty and increase oxygen levels. The community proposed a re-routing going around the forest. Were also concerned for the construction of new roads, especially in Mesopotamia where there are too many roads. Additionally, there were concerns regarding pollution, contamination of the water supply as well as noise which may affect the animals. Also a suggestion that alternative access such as bridge will need to be built if the pipeline crosses the village.

**TAP & Project definition:** Many questions were raised regarding TAP credentials and the details of the project such as materials used for the pipeline, details regarding the routes, timing for construction and links with other pipeline projects.

**Health & safety:** Concerns relating to potential impacts on irrigation, especially with regard to private boreholes which are expensive to build and timing for reinstatement.

**Potential benefits, employment & access to gas:** Questions regarding general benefits, employment opportunities and if there is anything that the settlements can do to access the gas supply.

**Key Issues: Orestida Municipality**

**Loss of livelihoods, land compensation & depreciation:** Consideration for market prices during the provision of compensation, and questions regarding the compensation process. Also mention of a fur manufacturer constructing close to the pipeline in Ampelokipoi.

**Health & safety:** People are seeking cheaper forms of energy as electricity is expensive. It was also mentioned that they plough up to 80cm and this could be a hazard to the pipeline.

**Project definition & impacts:** Questions regarding construction, depth of the pipeline and the safety zone. Consideration for the local water supply located close to the pipeline.

**Potential benefits, employment & access to gas:** Skepticism regarding potential benefits, and questions relating to access to gas and employment opportunities.

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**Key Issues: Amyntaio Municipality**

**Loss of livelihoods, land compensation & depreciation:** Cultivation of annual crops in the area, and questions raised regarding the compensation process. Additionally, leaseholders were unsure if TAP would hold negotiations with them or with landholders.

**Project impacts:** Queries relating to potential impacts on irrigation, especially with regard to private boreholes which are expensive to build, and timing for reinstatement.

**Health & safety:** People were concerned about health hazards and to geo-strategic danger (potential terror attacks).

**TAP & Project definition:** Questions relating to the depth of the pipeline, timing of construction and routing. Suggestion that TAP should consider the planned Kleisoura road tunnel.

**Potential benefits, employment & access to gas:** Questions regarding general benefits, employment opportunities and if there is anything that the settlements can do to access the gas supply.

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**Key Issues: Eordea Municipality**

**Loss of livelihoods, land compensation & depreciation:** The area comprises of mainly annual crops irrigated through private underground irrigation. Questions regarding restrictions to land use, especially in relation to small plots of land, and the compensation process were raised. Concern regarding the compensation and management of farmers who get subsidies from the government. Building restrictions and depreciation of land was also an issue. Additionally, leaseholders were unsure if TAP would hold negotiations with them or with landholders. Farmers are also interested in installing solar panels in agricultural areas and asked about changes in land use and how this would affect compensation.

**Legacy issues, project opposition & health & safety:** Issues stem from experience related to the PPC mines and power plants in the area which have caused cancer and respiratory health problems. This led to concerns if the gas can cause cancer, gas leaks and explosions. Also concern that the pipeline will not be deep enough due to the use of 80cm ploughs. Some people viewed the pipeline as too dangerous and made objections towards the Project saying that it will just cause damage and they do not want the pipeline to cross their fields.

**Project impacts:** Concerns regarding reinstatement of land and impacts on the quality of soil, damage to irrigation systems and the forest. Additionally, concerns regarding archaeological sites were an issue of importance to Perdikkas and Pentavrussos. Questions regarding waste management, contamination of rivers caused by chemicals and noise were also raised.

**Potential benefits, employment & access to gas:** Some scepticism with regard to benefits due to past experience with PPC and suggestion that only the government will benefit from taxes. See that there are no benefits if they are not going to be able to access gas or if there are no employment opportunities. There is high unemployment in the area and questions were raised regarding the origin of employees and types of opportunities available.
Stakeholder Voices

- There are farmers that get subsidies for specific area of trees. They are obliged to cultivate this area if they want to remain in the programme. What are you going to do about them? If you cross their fields then they cannot remain in the programme and get the subsidy. – Settlement meeting in Maniaki (Eordea municipality)

- The fields close to the roads may have a low value - if they build shops/structures close to the road the value may increase. However the pipeline may decrease the value of land as a whole. – Settlement meeting in Droseron (Eordea municipality)

- What if a person has one plot of land? You are taking away all their land. How are you going to compensate them? – Settlement meeting in Droseron (Eordea municipality)

- Are you going to reinstate all damages done to the field? Contaminated land from oil spills from the construction, the soil is going to be spoiled. How are you going to compensate? Farmers will not be able to cultivate their land any longer. – Settlement meeting in Pentavrussos (Eordea municipality)

- A new fur manufacture is projected to be constructed at a close distance from the pipeline. You should consider that it falls within the 200 m corridor. – Settlement meeting in Ampelokipoi (Orestida municipality)

- What happens if you cross irrigation? When will you finish reinstatement? People in the area irrigate their fields through private drills/boreholes, which were also expensive to build and are worried about the reinstatement of the irrigation systems and what will happen to the crops in the meantime. – Settlement meeting in Antigonos (Amyntaio municipality)

- There are land plots approximately 60 metres long. If the zone of building restrictions apply, there will be no room to build. – Settlement meeting in Verga and Agia Paraskevi (Kastoria municipality, Western Macedonia)

- When will we get compensation? People have been waiting 5 years for compensation from the Egnatia highway project. – Settlement meeting in Korissos (Kastoria municipality)

- No issues - See it as a positive development through the community. – Economic immigrant focus group in Ampelokipoi (Orestida municipality)

- Does the TAP project have information on the planned Kleisoura tunnel? – Settlement meeting in Varikon (Amyntaio municipality)

- 1 metre depth seems too little. It would be best if the pipeline is 2 metres underground because the plough used for cultivation is 60-70cm. There is a chance that it will hit the pipeline. – Settlement meeting in Korissos (Kastoria municipality)

- We have had experiences of companies which have left sites without restoring land or clearing up after themselves. Companies promise things and do not carry them out. People are suspicious and do not trust the government. We want the company to stick to their word - you may promise a new irrigation system, but if you do not provide one there will be problems. – Settlement meeting in Poreia (Kastoria municipality)

- Explosions from the quarry (10 km away from the village) could be heard at the village. To build the pipeline you are going to use explosives. This will be a nuisance to the village. – Settlement meeting in Maniaki (Eordea municipality)

- The pipeline passes through the pine forest which provides oxygen in the area. The local community planted the pine trees themselves and we are very protective of the area. The other objective was to have an area of natural beauty. We would like the route to go around the forest. – Settlement meeting in Kleisoura (Kastoria municipality)

- What will the future restrictions be? Today a farmer may be cultivating wheat but he may want to install solar panels, plant trees or build a hotel since our area is under development (agrotourism). – Settlement meeting in Agia Kuriaki (Kastoria municipality)

- If there is an earthquake what will happen? In 1995 in Kozani the earthquake opened up the ground to 45 metres deep. – Settlement meeting in Tsakoni (Kastoria municipality)

- We are not experienced regarding this type of projects and we cannot perceive what the changes will be for us. Based on the LARCO experience, no one could have realised that we would have our road destroyed etc. from the mining activities. Only when the pipeline is being constructed will we know what it will be like and the impacts. – Settlement meeting in Agia Kuriaki (Kastoria municipality)

- Will people be employed by the project? Another project promised that they would employ locally but this did not happen. – Settlement meeting in Tsakoni (Kastoria municipality)

- If there is a contract, will the government be involved in the project? – Settlement meeting in Korissos (Kastoria municipality)
7.4.2.2 TAP Greece East

As shown in Figure 7-8, livelihood and compensation issues were raised most often (27%) in all the meetings, followed by potential benefits and local investments of the Project (14%). However, impacts and their management (13%) and purchase of gas (13%) were also raised frequently in the meetings in all the municipalities. The frequency of raised points is further broken down in Table 7-8 which presents information by municipality. The following paragraphs elaborate on these points and specific topics of concern.

The types of comments raised are reflective of the socioeconomic conditions of the settlements along the proposed route as described in Section 6 of the ESIA (Socioeconomic Environment). The main points raised per district and within each municipality are summarised in Figure 7-9 to Figure 7-15.

### Table 7-8: Issues Raised Per Issue and Municipality (Actual Number and (%)) in TAP Greece East

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<thead>
<tr>
<th>Region: Eastern Macedonia-Thrace</th>
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<tbody>
<tr>
<td><strong>Soufli</strong></td>
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<td>7</td>
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<td>2 (29%)</td>
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<tr>
<td>1 (14%)</td>
<td>0%</td>
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<tr>
<td>0 (0%)</td>
<td>0%</td>
</tr>
</tbody>
</table>

| **Alexandroupoli**               | **Total** |
| 13                               | 204       |
| 63 (31%)                         | 10%       |
| 20 (10%)                         | 13%       |
| 26 (13%)                         | 7%        |
| 7 (3%)                           | 14%       |
| 14 (7%)                          | 12%       |
| 25 (7%)                          | 10%       |
| 20 (10%)                         | 12%       |
| 24 (12%)                         | 2%        |
| 5 (2%)                           | 0%        |

| **Maronia - Sapes**              | **Total** |
| 4                                | 104       |
| 26 (25%)                         | 11%       |
| 8 (8%)                           | 17%       |
| 18 (17%)                         | 11%       |
| 11 (11%)                         | 7%        |
| 20 (7%)                          | 13%       |
| 14 (7%)                          | 12%       |
| 5 (5%)                           | 14%       |
| 15 (5%)                          | 0%        |
| 0 (0%)                           | 0%        |

| **Komotini**                     | **Total** |
| 4                                | 65        |
| 16 (25%)                         | 25%       |
| 10 (15%)                         | 17%       |
| 29 (45%)                         | 17%       |
| 1 (2%)                           | 0%        |
| 3 (5%)                           | 0%        |
| 1 (2%)                           | 0%        |
| 0 (0%)                           | 0%        |
| 5 (8%)                           | 0%        |
| 0 (0%)                           | 0%        |

| **Iasmos**                       | **Total** |
| 6                                | 86        |
| 27 (31%)                         | 18%       |
| 1 (1%)                           | 0%        |
| 14 (16%)                         | 13%       |
| 10 (12%)                         | 7%        |
| 6 (7%)                           | 0%        |
| 6 (7%)                           | 0%        |
| 0 (0%)                           | 0%        |
| 22 (26%)                         | 0%        |

| **Avdira**                       | **Total** |
| 15                               | 148       |
| 32 (22%)                         | 13%       |
| 19 (13%)                         | 13%       |
| 23 (16%)                         | 9%        |
| 14 (9%)                          | 7%        |
| 4 (3%)                           | 3%        |
| 40 (27%)                         | 27%       |
| 8 (5%)                           | 3%        |
| 5 (3%)                           | 2%        |

| **Topiros**                      | **Total** |
| 7                                | 91        |
| 25 (27%)                         | 21%       |
| 9 (10%)                          | 9%        |
| 12 (13%)                         | 12%       |
| 12 (13%)                         | 12%       |
| 6 (5%)                           | 0%        |
| 1 (1%)                           | 0%        |
| 5 (1%)                           | 0%        |

| **Nestos**                       | **Total** |
| 7                                | 145       |
| 64 (44%)                         | 17%       |
| 15 (16%)                         | 10%       |
| 8 (9%)                           | 12%       |
| 11 (12%)                         | 26%       |
| 24 (26%)                         | 25%       |
| 23 (25%)                         | 0%        |
| 0 (0%)                           | 0%        |
| 0 (0%)                           | 0%        |

| **Kavala**                       | **Total** |
| 17                               | 39        |
| 1 (3%)                           | 0%        |
| 2 (56%)                          | 0%        |
| 1 (3%)                           | 0%        |
| 5 (13%)                          | 3%        |
| 1 (13%)                          | 3%        |
| 1 (13%)                          | 3%        |
| 1 (13%)                          | 3%        |
| 3 (6%)                           | 0%        |

| **Doxato**                       | **Total** |
| 7                                | 115       |
| 36 (31%)                         | 13%       |
| 6 (5%)                           | 17%       |
| 15 (13%)                         | 11%       |
| 19 (17%)                         | 11%       |
| 13 (17%)                         | 11%       |
| 13 (17%)                         | 11%       |
| 5 (4%)                           | 6%        |
| 1 (1%)                           | 0%        |

| **Paggaio**                      | **Total** |
| 12                               | 123       |
| 24 (20%)                         | 19%       |
| 6 (5%)                           | 13%       |
| 19 (15%)                         | 15%       |
| 6 (5%)                           | 15%       |
| 19 (15%)                         | 21%       |
| 3 (2%)                           | 0%        |
| 26 (21%)                         | 4%        |

<table>
<thead>
<tr>
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<tr>
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</tr>
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</tr>
<tr>
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<td>0%</td>
</tr>
<tr>
<td>0 (0%)</td>
<td>0%</td>
</tr>
</tbody>
</table>

| **Nea Zichni**                   | **Total** |
| 8                                | 106       |
| 29 (27%)                         | 19%       |
| 4 (4%)                           | 19%       |
| 20 (19%)                         | 29%       |
| 31 (1%)                          | 15%       |
| 1 (1%)                           | 15%       |
| 16 (1%)                          | 15%       |
| 4 (4%)                           | 1%        |
| 1 (1%)                           | 0%        |

| **Emmanouil Papa**               | **Total** |
| 8                                | 123       |
| 24 (20%)                         | 16%       |
| 6 (5%)                           | 13%       |
| 19 (15%)                         | 15%       |
| 6 (5%)                           | 15%       |
| 19 (15%)                         | 21%       |
| 3 (2%)                           | 0%        |
| 26 (21%)                         | 4%        |

<table>
<thead>
<tr>
<th><strong>Project Title:</strong> Trans Adriatic Pipeline – TAP</th>
<th><strong>Document Title:</strong> Integrated ESIA Greece Section 7 - Stakeholder Engagement</th>
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</thead>
<tbody>
<tr>
<td><strong>GPL00-ASP-642-Y-TAE-0055</strong></td>
<td><strong>Rev.: 00</strong></td>
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</tbody>
</table>
In summary:

- Loss of livelihood and land compensation was an issue raised in all municipalities, particularly due to poor experience with past major infrastructure projects. Municipalities of Kavala (44%), Topiros (44%), Iraklia (37%), Oreokastro (37%) and Chalkidona (37%) illustrated the highest level of concern on the given issue. This is related to a high level of agricultural productivity in these municipalities, particularly cultivation of wheat and maize, as well as to poor experience with other major infrastructure projects. Communities are consequently concerned about how TAP AG will compensate for the time and financial investments they have made in their lands as well as restrictions to land use, including restrictions on building and depreciation of land. In addition to the above mentioned municipalities, the loss of livelihood, land compensation and depreciation issue were also raised in the municipality of Maronia – Sapes (25%). There was a great concern about the loss of agricultural subsidies by the Greek competent body (OPEKEPE - Greek Payment Authority of Common Agricultural Policy) in the case of non-cultivation because of project impacts.
In the municipalities of Kilkis (42%), Amfipoli (33%), Topiros (33%) and Avdira (27%) there were as many questions about potential benefits and local investments of the Project as those concerning land loss and compensation. Although categorised separately in the analysis of results presented above, the possibility of access to gas and employment were seen as benefits in most municipalities and participants felt that if these opportunities were not available, there would consequently be no benefits at all. This is reflective of the last bullet point below relating to scepticism and negativity based on the current economic climate and past experience with similar development projects. It was suggested that local employment opportunities and access to gas would improve the quality of life by supporting the communities with the major unemployment issue and by providing a cheaper source of energy for heating. Areas where employment was a major issue include Kilkis (26%), Iasmos (26%) and Emmanouil Papa (21%). The issue of access to gas was mainly raised in Oreokastro (31%), Nea Zichni (29%), Iraklia (23%) and Serres (20%).

Many stakeholders raised concerns about a variety of Project impacts, particularly in Komotini (45%) and Lagada (23%) where most questions were regarding landscape restoration, impacts on irrigation system, water-wells or boreholes and impacts on fertile soil. These concerns were mainly raised due to poor experience from other infrastructure projects. The above mentioned project impacts were also a major concern in Nea Zichni (19%), Maronia – Sapes (17%) and Avdira (16%). In Maronia – Sapes the issue of hydrotest water disposal was also raised.

Details regarding the TAP Project were more or equally as important as the above mentioned issues in Chalkidona (60%), Serres (26%), Amfipoli (17%) and Oreokastro (16%). Stakeholders were concerned with the detail of the Project including depth of the pipeline, construction techniques, exact route and relation to existing national gas pipeline.

Health and safety was also commonly raised as a concern. The municipality of Amfipoli illustrated the greatest level of concern (42%) with regards to the disposal of potential wastes to nearby rivers followed by Kavala (26%). Other areas raising the same issue include Pageo (11%) and Serres (9%). Key issues raised in these municipalities were related to potential explosions and leaks as well as impacts to the environment and people. Additionally settlements were concerned about how the emergency cases would be managed.
Other points of discussion included the stakeholder engagement process and the government's role in the Project. Stakeholders were concerned about the government's involvement in the Project with regards to recruitment process, compensation process and use of funds raised from the Project. The question about how TAP AG would manage political intervention in the Project was also posed.
Key issues: Soufli, Alexandroupoli Municipality

Loss of livelihood, land compensation and depreciation: Skepticism regarding loss of livelihood, land compensation and depreciation due to poor experience from past infrastructure projects. People wanted to know when compensations will be paid. Suggestion for a rerouting in Amfitriti, towards the south, so that pipeline crosses public land instead of private properties and cultivations.

Project Impacts: Skepticism regarding land reinstatement and repair of roads since past infrastructure projects failed to comply with these obligations. Concerns that the Project will destroy the land, in terms of fertility, and reduce its value. Suggestions to TAP on land acquisition or minimization of safety corridor width.

Health and Safety: Queries regarding safety standards. Concerns regarding the 1-1.5m pipeline depth since farmers use ploughs long enough to cause damage.

Potential benefits and access to gas: Queries as to whether gas will be given to the state and to local the community. Questions regarding social countervailing benefits for the area where also raised.

Employment: Unemployment is a very serious problem in the area and the local communities requested the Project to engage local workforce. People also wanted to know about permanent working positions after construction. Concerns about political intervention were also raised.

Key issues: Maronia - Sapes Municipality

Loss of livelihood, land compensation and depreciation: Great skepticism on land compensation. A number of questions were posed such as price of compensation, type of payment, how much of the land is compensated, who will establish the price of compensation and whether a written confirmation on compensation will be given by TAP. People expressed their concern on the loss of agricultural subsidies by the Greek competent organization in the case of non cultivation due to project impacts.

Project Impacts: Skepticism on land reinstatement due to poor experience from past infrastructure projects. Queries regarding the hydrotest water and the potential impacts to underground water network since irrigation pipes in the area are placed 1m deep and also above ground reels.

Health and Safety: Questions regarding training of personnel in the case of leak incidents and potential pollution from the construction of the pipeline. Stakeholders raised the issue due to the presence of gold causing pollution in the area. They were concerned whether the pipeline would cause more pollution and impact their way of life.

Potential benefits and access to gas: Questions on the potential benefits to the area and possibility of access to gas for local community. Suggestion of a road infrastructure between Chamilo and Sikorachi villages on countervailing benefits was given by the residents of Chamilo. Additionally questions regarding benefits to the state were also raised.

Employment: Queries on the required number of employees for the Project. People requested employment positions for the younger people since unemployment is a major issue in the area.

Project Opposition: Question as to whether people of the local community have the right to oppose the pipeline to pass through their property.
Stakeholder Voices

- We are forgotten by God and people, why should we accept? – Settlement meeting in Peplos (Alexandroupoli municipality)

- I have a 20 acre plot of land and the previous pipeline passes through for a length of 250m. Now they say that in a distance of 16m, which can reduce even to 8m, TAP pipeline will pass through. What will happen with my property? – Settlement meeting in Kavissos (Alexandroupoli municipality)

- Won’t we have to go to court like in previous natural gas pipeline in order to get our money? – Settlement meeting in Aetochori (Alexandroupoli municipality)

- Unemployment is a very serious problem in the area. If we find out Italian or Norwegian are employed in the project we will mistreat them. – Settlement meeting in Anthia (Alexandroupoli municipality)

- In previous projects, the contractors brought their own machinery and workers and they didn’t use the local material and people from the area. What will you do? – Settlement meeting in Agnantia (Alexandroupoli municipality)

- Why should the pipeline go through my property if there is no monetary or energy benefit for the village to have natural gas? – Settlement meeting in Agnantia (Alexandroupoli municipality)

- I have a 7 acre plot of land. The previous pipeline went through it and I can’t build 20m from it. They have a distance of 16m between them and the other pipeline will go through it as well. This means that I will not be able to build for another 20m. My property is completely destroyed. What will happen? – Settlement meeting in Agnantia (Alexandroupoli municipality)

- I have a piece of land where I grow olive trees. Olive trees are long living, and it will take long time for me to reinstate my land. I request that the pipeline is placed out of my property if this is possible. – Settlement meeting in Amfitriti (Alexandroupoli municipality)

- Fine, you came by, we discussed and then you’ll disappear and everything will be ok as long you pass the pipeline through. Then you will forget us. – Settlement meeting in Chamilo (Maronia-Sapes municipality)

- I wont say either yes or no to the passing of the natural gas pipeline, but in Perama the company that has undertaken the gold mining project has made up roads exclusively for their own use. – Settlement meeting in Amaranta (Maronia-Sapes municipality)
Key issues: Iasmos Municipality

Loss of livelihood, land compensation and depreciation: Concerns on land compensations and loss of livelihood due to bad experience from past infrastructure projects. There was opposition to the Project in Koptero due to the small size of land ownerships in the settlement and the impacts the project might cause in depreciation.

Project Impacts: Questions on potential impacts to the irrigation system as well as to the soil with regards of being productive after completion of works.

Health and Safety: Questions regarding explosions were raised.

Potential benefits and access to gas: Queries on countervailing benefits and distribution of gas to local households.

Key issues: Komotini Municipality

Loss of livelihood, land compensation, depreciation and development plans: Concerns on loss of livelihood and land compensation due to bad experience from past infrastructure projects. Concerns also on title deeds and their non-existence due to vast amount of money for heritage acceptance were raised in the municipality. Additionally, requests on re-routings in an area where future expansion of the town planning is considered were also raised. Also there was a request on a rerouting in Mesochori, between the Egnatia junction, Mesochori and Itea due to an industrial development. Suggestion to place the pipeline south of Mesochori and Itea was given by the local community of Kosmio, where the land is uncultivated.

Project Impacts: Questions on reinstatement of access roads, re-use of the top soil and soil deposition were raised.

Employment: Questions regarding employment using workforce from the local community were raised.

Key issues: Avdira Municipality

Loss of livelihood, land compensation and depreciation: Concerns on loss of livelihood, land compensation and restriction zones were raised due to experience with past infrastructure projects. Compensation price was also an issue.

Project Impacts: Requests on land reinstatement and good infrastructure measures so that leakages are avoided. Queries on the environmental potential impacts during construction were also raised.

Health and Safety: Questions regarding explosions were raised.

Potential benefits and access to gas: Queries on potential benefits to the state and the local communities were raised. Queries on distribution of gas to local communities were also raised.

Project opposition: Questions regarding the consequences of someone opposing the pipeline to pass through their property.
Stakeholder Voices

- We don't have land titles because it requires a lot of money for heritage acceptance from our grand fathers. Furthermore, if we legally rent the land, we will have to pay 11% of the nominal value in 20 years and we don't have this money. – Settlement meeting in Fylakas (Komotini municipality)

- Close to our village a bridge was constructed in order to have access to the village and then another one was constructed. The water flows over the fields and the soil moves apart. So in my field the pipeline is placed in 0.5m depth. Competent employees came from Xanthi and they pour concrete but nothing has changed. So I cannot cultivate my piece of land. Take this in mind so that it wont happen again with the new pipeline. – Settlement meeting in Meleti (Komotini municipality)

- Tells us something negative about the whole Project because it all seems too good to be true. – Settlement meeting in Amaxades (Iasmos municipality)

- Who can guarantee that after 5 years the field will be as productive as it was before the construction? – Settlement meeting in Amaxades (Iasmos municipality)

- If they do not give us what we are entitled to, we will not allow the project to be implemented – Pomac focus group in Amaxades (Iasmos municipality)

- At my old age, you will force me to take a gun and come after you if I see you here – Settlement meeting in Koptero (Iasmos municipality)

- From the previous project our fields were destroyed and now we want good compensation – Farmer focus group in Galini (Iasmos municipality)

- Will this zone of 38m (working width during construction) last forever? – Settlement meeting in Magiko (Avdira municipality)

- When a field is crossed in the middle by the pipeline, then it is useless, you cannot build on it. – Settlement meeting in Feloni (Avdira municipality)

- In the previous pipeline construction, many damages were caused, and this is why we all react to the project. – Settlement meeting in Feloni (Avdira municipality)

- I have olive trees, will they compensate me? – Settlement meeting in Polysitos (Avdira municipality)

- I request that if this project is finally constructed a part of the transit fees paid to be forwarded to the local communities. – Settlement meeting in Vafeika (Avdira municipality)
Key issues: Nestos Municipality

Loss of livelihood, land compensation and depreciation: Agricultural production is the main economic activity. The main crops are wheat, corn, rice. People raised their concerns due to the former infrastructure projects and do not want the Project to be constructed during the peak production period in which they will lose their produce. People requested good land compensation. They are very biased regarding the compensations and believe they will not receive any money.

Project Impacts: Concerns regarding reinstatement of land and impacts on the quality of soil, since people have had bad experience with past infrastructure projects in the area. People suggested the topsoil to be put to the side and then replaced again after the pipeline has been placed. They also requested access roads to be repaired upon completion of the works. Questions regarding discharge of the hydrotest water were also raised.

Health and Safety: Some concerns regarding explosions were raised.

Potential benefits and access to gas: Queries on countervailing benefits and access to gas.

Employment: Queries on using local workforce for the project were raised.

Project opposition: Questions regarding the consequences of someone opposing the pipeline to pass through their land were also raised.

TAP & Project definition: Queries on local routing, construction, depth of pipeline and relation to existing national pipeline were raised.

Key issues: Kavala Municipality

Loss of livelihood, land compensation and depreciation: People skeptical about the project with regards to loss of livelihood and land compensation, due to not receiving any compensation from past infrastructure projects.

Project Impacts: Questions were raised where the pipeline goes through municipal boreholes. Queries on the construction depth of the pipeline were also raised due to land subsidence in the turf area.

Health and Safety: Queries regarding explosions were raised, particularly in Krinides where negativity towards the Project was expressed.

Potential benefits and access to gas: Questions and requests regarding the countervailing benefits to the local communities and not the municipality since unemployment is a major issue in the area.

Project opposition: Negativity towards the Project in Nea Kavali where the people stated that according to law 3422/2005 they can stop the construction of the pipeline if no common agreement on compensations is reached.

Key issues: Topiros Municipality

Loss of livelihood, land compensation and depreciation: Concerns on land compensation due to poor experience from past infrastructure projects. Questions on the amount of compensation were also raised.

Health and Safety: Queries regarding blastings during construction due to house foundation strength issues arising during construction on past infrastructure projects.

Project opposition, potential benefits & access to gas: Questions relating to access to gas. Questions regarding the consequences of opposing the Project were also raised.

Employment: Unemployment is a major problem for the area. Concerns whether recruitment process for the Project will be intervened by the government cause this could result in a non-transparent process.
Stakeholder Voices

- Will the recruitment of employees be transparent? Sometimes a mayor or a member of the Parliament intervenes to the recruitment process. – Settlement meeting in Thalassia (Topiros municipality)
- They went through my field and I didn’t get anything. – Settlement meeting in Pontolivado (Nestos municipality)
- "The fields are lost; we can’t build and plant trees". Farmer focus group in Pontolivado (Nestos municipality)
- We desire full restoration of the fields that we cultivate for living. We would like to request a well organised project management and supervision and implementation of all commitments made by TAP. – Settlement meeting in Gravouna (Nestos municipality)
- I have an 11 acres piece of land which is crossed by the DESFA pipeline and if TAP passes from it I will not be able to build on it. – Settlement meeting in Gravouna (Nestos municipality)
- Can I create a photovoltaic module in my field? – Settlement meeting in Neos Xerias (Nestos municipality)
- We are currently building a church. If TAP helps us, people will not have any problem with your project. – Settlement meeting in Neos Xerias (Nestos municipality)
- Our fields and crops become useless. We cannot build, but also cannot use the land to plant tree crops – Farmer focus group in Nea Karvali (Kavala municipality)
- Why does this pipeline have to go through my field? The other pipeline has already gone through. They have destroyed us. We won’t allow another pipeline to go through. – Settlement meeting in Chalkero (Kavala municipality)
- No matter our opinion, the Project will go forward. We had also protested for the construction of the fertilizer factory but nothing changed. The same will happen in this case. – Elderly focus group in Chalkero (Kavala municipality)
- This pipeline is a "bomb" next to our houses. – Settlement meeting in Amygdaleonas (Kavala municipality)
- There are companies that buy land 100,000 euro/ ha but upon construction of the pipeline the value of our land will drop. – Settlement meeting in Krinides (Kavala municipality)
- What will happen with the crop production? – Settlement meeting in Polistilo (Kavala municipality)
- Construction of the pipeline in 1 m depth is not deep enough due to land subsidence in the area from the turf in Tenagi. – Settlement meeting in Krinides (Kavala municipality)
- Are we going to get gas? Is this foreseen? – Settlement meeting in Polistilo (Kavala municipality)
Key issues: Paggaio Municipality

Loss of livelihood, land compensation and depreciation: Concerns on loss of livelihood, loss of income, and loss of property value due to the existing pipeline and the low productivity due to the turf geological formations, particularly in Chartokopi. Farmers in the area do not want the pipeline to go through their land.

Project Impacts: Questions regarding the cultivations due to potential impacts to top soil, and potential impacts to irrigation system and land reinstatement. People asked if it is technically possible to place the pipeline deeper than 1m depth. Also queries about possible explosions that could affect the water level in the reservoir in Antifilippoi were raised.

Health and Safety: Queries relating to potential gas leakages were raised.

Potential benefits and access to gas: Queries on countervailing benefits and distribution of gas to local households.

Employment: Requests on employing local workforce for the Project.

TAP & Project definition: Questions on whether TAP and Burgas is the same project, local routing, construction and operation phase clarifications.

Key issues: Amfipoli Municipality

Loss of livelihood, land compensation and depreciation: Some concerns on loss of livelihood and land compensation.

Project Impacts: Some concerns regarding the cultivations due to potential impacts to top soil and land reinstatement.

Health and Safety: Queries on health and safety issues and in particular explosions were raised.

Potential benefits and access to gas: Queries on countervailing benefits and distribution of gas to local households.

TAP & Project definition: Queries on Project information such as pipeline route, materials to be used, Project progress and consultation process.

Key issues: Doxato Municipality

Loss of livelihood, land compensation and depreciation: Some concerns on loss of livelihood and land compensation.

Project Impacts: Some concerns regarding the cultivations due to potential impacts to top soil and land reinstatement.

Health and Safety: Queries on health and safety issues and in particular explosions were raised.

Potential benefits and access to gas: Queries on countervailing benefits and distribution of gas to local households.

TAP & Project definition: Queries on Project information such as pipeline route, materials to be used, Project progress and consultation process.
Stakeholder Voices

- On the previous pipeline construction, we had been told that they would give a 75% compensation of the crops value. However, they didn’t keep their promises. The same will happen now. – Settlement meeting in Symboli (Amfipoli municipality)

- How long will the disturbance from the construction last in each area? – Settlement meeting in Symboli (Amfipoli municipality)

- It is positive if unemployed people in the area work on the Project. – Women focus group in Eleftheroupoli (Paggaio municipality)

- What will be the benefit for the residents? Can it distribute gas to our households? – Settlement meeting in Antifilippoi (Paggaio municipality)

- We want improvement of the lighting of the settlement, especially towards the Aggis Canyon for a 200m distance. – Settlement meeting in Symboli (Amfipoli municipality)

- The pipeline will pass very close to our village. Why should the European countries be the only ones to have a benefit from it? We are going to claim a share of the benefit. – Settlement meeting in Palaiochori (Paggaio municipality)

- What will be the gas mixture be? – Settlement meeting in Agia Paraskevi (Doxato municipality)

- How long will construction last? – Settlement meeting in Kalamonas (Doxato municipality)

- Has Greece requested gas from TAP? – Settlement meeting in Kalamonas (Doxato municipality)

- Will our village take gas from the pipeline? – Settlement meeting in Symboli (Amfipoli municipality)

- When will the project begin? – Settlement meeting in Symboli (Amfipoli municipality)

- What will happen with the trees? What about the solar parks? – Settlement meeting in Palaiochori (Paggaio municipality)

- Will there be any impacts? – Settlement meeting in Agia Paraskevi (Doxato municipality)

- We attended this meeting cause we thought we are going to get gas – Settlement meeting in Agia Paraskevi (Doxato municipality)

- What will happen in the case the pipeline crosses a structure? – Settlement meeting in Kalamonas (Doxato municipality)
Key issues: Nea Zichni Municipality

Loss of livelihood, land compensation and depreciation: Queries on land compensation and loss of livelihood as well as clarification on the amount of compensation between landowners and cultivators.

Project Impacts and development plans: Concerns regarding reinstatement of the soil surface were raised due to the fact that local people had to excavate and backfill themselves in previous infrastructure projects. Suggestions on locations for temporary construction facilities were provided by the local communities in the area of Livadi and Neochori. Concerns on impact to the irrigation system were also raised.

Health and Safety: Queries regarding potential impacts to human health were raised.

Potential benefits and access to gas: Queries on countervailing benefits and distribution of gas to local households. Requests that a percentage of the transit fees is given to the local communities were stated.

Employment: Questions were raised regarding employment opportunities to local communities.

TAP & Project definition: Questions regarding local routing, depth of the pipeline and construction clarifications.

Key issues: Kilkis, Serres Municipality

Loss of livelihood, land compensation, depreciation and development plans: Queries on land compensation as to how and when will it be given, loss of livelihood and restriction zones. Farmers of the area are concerned about loss of useful land upon construction. Residents of Provatas raised the issue of future development plans of merging with settlement of Monoklisia thus pipeline being too close to spatial zone. They suggested re-routing around the villages.

Project Impacts: Queries regarding the restoration of the construction zone upon completion of works as well as the potential impacts on the irrigation channels used for watering cultivations. The local community of Krinos raised questions regarding the noise impacts from the compressor stations. There was opposition on the location of the compressor station alternative C. Suggestions for using CS alternative D were made. Concerns regarding potential impact to irrigation boreholes, storage areas, network of water wells and electric power supply were also raised.

Health and Safety: Concerns relating to potential safety issues that might affect the local communities such as pollution or explosions due to high rates of diseases in the area. Questions as to whether setting fire to the crops on the land above the pipeline will cause a problem were also raised in the settlement of Ano Kamila.

Project opposition, potential benefits & access to gas: Queries on potential benefits to the local communities and as to whether the area is going to have access to gas. Questions regarding the consequences of someone opposing the pipeline to pass through their property were also raised.

Employment: Queries on using local workforce for the project were raised.

TAP & Project definition: Questions regarding timing of construction, depth of the pipeline and distance to existing gas network were raised.

Key issues: Emmanouil Pappa Municipality

Loss of livelihood, land compensation and depreciation: Queries on land compensation and loss of livelihood as well as clarification on the amount of compensation between landowners and cultivators.

Project Impacts and development plans: Concerns regarding reinstatement of the soil surface were raised due to the fact that local people had to excavate and backfill themselves in previous infrastructure projects. Suggestions on locations for temporary construction facilities were provided by the local communities in the area of Livadi and Neochori. Concerns on impact to the irrigation system were also raised.

Health and Safety: Queries relating to potential safety issues were raised.

Potential benefits and access to gas: Queries related to potential gas leakages and effect to the environment and people were raised.

Employment: Questions were raised regarding employment opportunities to local communities.

TAP & Project definition: Questions regarding local routing, depth of the pipeline and whether it is 1m deep throughout the length and construction clarifications.

Stakeholder Issues Map – Central Macedonia (Nea Zichni – Serres)
Stakeholder Voices

- We are worried about the compensations although foreigners usually pay. – Farmer focus group in Gazoros (Nea Zichni municipality)

- All our irrigation and road networks are going to be stopped. – Settlement meeting in Nea Zichni (Nea Zichni municipality)

- The problem is that we are obliged to cultivate a specific kind of crop in our lands, the ones with a short term root. – Settlement meeting in Nea Zichni (Nea Zichni municipality)

- What is the impact by the pipeline to the human health? – Settlement meeting in Neochori (Emmanouil Pappa municipality)

- How much land does a compressor station take? – Settlement meeting in Neochori (Emmanouil Pappa municipality)

- Can you tell us more about the construction and landscape restoration? – Settlement meeting in Tholos (Nea Zichni municipality, Central Macedonia)

- Can we refuse the pipeline construction in our area? – Settlement meeting in Neochori (Emmanouil Pappa municipality)

- Will TAP give anything to our village? – Settlement meeting in Ano Kamila (Serres municipality)

- Our concern is if we will obtain gas and if our field will become inappropriate for cultivation. – Settlement meeting in Mitrousi (Serres municipality)

- It has been years since the previous pipeline and we still have problems because of it. Can we just say no? – Settlement meeting in Neochori (Emmanouil Papa municipality, Central Macedonia)

- If the station is constructed in this area this will mean our destruction – Farmer focus group in Krinos (Serres municipality)

- What will happen if I do not give my property? – Settlement meeting in Provatas (Serres municipality)
Key issues: Lagadas Municipality

**Loss of livelihood, land compensation and depreciation:** People skeptical about land compensation as to how and when will it be given, since they have bad experience from past infrastructure projects. Compensation price was also an issue. Questions on restriction zones were also raised.

**Project Impacts:** Questions about landscape restoration and potential impacts to the water, water-wells and the cattle raising units.

**Health and Safety:** Queries as to whether the pipeline passing close to the settlements is generally dangerous to the residents. Residents needed more clarifications on health issues, as to whether contact of the pipeline with the soil might pose danger to the people by causing cancer. Blasting was also another concern that was raised.

**Potential benefits and access to gas:** Questions on potential benefits to the community and access to gas were raised.

**Employment:** Questions on local employment opportunities including use of local equipment operators were raised.

**Project opposition:** Questions regarding the consequences of someone opposing to sell their land.

**TAP & Project definition:** Many questions were raised regarding the Project such as routing, importance of the pipeline, local routing, depth of the pipeline and whether there is 1m deep throughout and construction clarifications.

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Key issues: Iraklia Municipality

**Loss of livelihood, land compensation and depreciation:** Concerns regarding loss of livelihood and land compensations, particularly regarding the amount of appropriate compensations due to the multiannual cultivations in the area as well as the duration of compensation process. Farmers of the Kalokastro area were worried about the tobacco plantations as well as the construction season not to be during the sowing period. Additionally, people had queries as to whether agricultural producers would get compensated too for loss of income since a lot of the land in the area is rented.

**Project Impacts:** Queries on landscape restoration were raised. Concerns on demolition of cow barns within their properties due to routing in Kefalochori were also raised.

**Health and Safety:** Queries as to whether the pipeline passing close to the settlements is generally dangerous to the residents. Residents needed more clarifications on health issues, as to whether contact of the pipeline with the soil might pose danger to the people by causing cancer. Blasting was also another concern that was raised.

**Potential benefits and access to gas:** Questions on potential benefits to the community and access to gas were raised.

**Employment:** Queries about local workforce to the project were raised.

**Project opposition:** Questions regarding the consequences of someone opposing to sell their land.

**TAP & Project definition:** Many questions were raised regarding the Project such as routing, importance of the pipeline, local routing, depth of the pipeline and whether there is 1m deep throughout and construction clarifications.
Stakeholder Voices

- What about our trees? – Settlement meeting in Kefalochori (Iraklia municipality)
- Are we going to be employed in this project or will you bring people from Athens? – Settlement meeting in Kalokastro (Iraklia municipality)
- In this village we have multiannual cultivations, so what is the appropriate compensation? – Settlement meeting in Livadochori (Iraklia municipality)
- What will be the benefit for the village? Can it take gas? – Settlement meeting in Kefalochori (Iraklia municipality)
- What will happen if I find a buyer for my land, but one cannot build on that land due to the limitations? – Settlement meeting in Lachanas (Lagada municipality)
- Will there be impacts to the water? – Settlement meeting in Evaggelistria (Lagada municipality)
- Projects are made one right after the other but there are no countervailing benefits. Settlement meeting in Assiros (Lagada municipality)
- What will the compensation price be? The market value or the one which is defined by the government? – Settlement meeting in Lachanas (Lagada municipality)
- How about the land restoration? – Settlement meeting in Lachanas (Lagada municipality)
- How close does the pipeline pass from the village? Is it dangerous for the residents? – Settlement meeting in Kefalochori (Iraklia municipality)
- Are there impacts from the contact of the metal with soil? Could it cause cancer? – Settlement meeting in Lachanas (Lagada municipality)
Key issues: Oreokastro Municipality

Loss of livelihood, land compensation and depreciation: People skeptical about land compensations particularly regarding the price of the compensation and loss of livelihood due to past experience with other infrastructure projects. Questions on future construction limitations were also raised.

Project Impacts: The major concern in the municipality was regarding land reinstatement due to bad past experience with other infrastructure projects.

Potential benefits and access to gas: Queries on potential benefits to the local community and whether gas will be given to the state as well as to local communities.

Employment: Questions regarding employment opportunities and the use of local workforce for the Project were raised.

Project opposition: Questions regarding the consequences of someone opposing the pipeline to pass through their land were also raised. Farmers in the area, particularly around Pentalofos, were negative about the Project because they believe that such a project downgrades the quality of life of the people. However they stated that social countervailing benefits could balance that.

TAP & Project definition: Questions on the exact routing and the depth of the pipeline were raised, as well as whether TAP will transfer or distribute gas.

Key issues: Chalkidona Municipality

Loss of livelihood, land compensation and depreciation: Concerns on land compensation and loss of livelihood since the community relies on farming and agriculture. People felt that project imposes only negative impacts because they fear that cultivation and land will be destroyed. Due to biological cultivation since 1996/1997 in Nea Mesimvria the people fear that the pipeline will spoil (affect) the quality of their products making them less competitive.

Project Impacts: Concerns that boreholes will be affected by the Project.

Project opposition: General opposition about the Project. They want a re-routing.

TAP & Project definition: Questions on the exact routing and the depth of the pipeline were raised, as well as whether TAP will transfer or distribute gas.
Stakeholder Voices

- How and when will we be given the compensations? We have previous experience with the pipeline that crosses our village and till now none of us has received what they have promised us. – Settlement meeting in Pentalofos (Oreokastro municipality)

- Europe will be saved, but Greece as well as the village will not gain anything. – Farmer focus group in Pentalofos (Oreokastro municipality)

- My field costs 300,000 euros, will the company be able to reimburse me? – Settlement meeting in Melissochori (Oreokastro municipality)

- You can still find in our fields stones (from past infrastructure) which damaged our cultivation (land reinstatement was not conducted properly). Our fields lost value and we were never compensated as we should. They gave us "peanuts". We are worried that the same will happen with this Project. – Farmer focus group in Melissochori (Oreokastro municipality)

- As you said, the new pipeline route will run parallel to the existing one, so what is the difference? The routing will cross the same properties. Why do you need our opinion? – Settlement meeting in Drymos (Oreokastro municipality)

- We don’t care about the money. We just don’t want the pipeline. – Settlement meeting in Nea Mesimvria (Chalkidona municipality)

- Will our area be able to access gas from this pipeline in the future and how? – Settlement meeting in Drymos (Oreokastro municipality)

- This pipeline will transfer gas or will it distribute as well? – Settlement meeting in Melissochori (Oreokastro municipality)

- How far is it from the existing pipeline? – Settlement meeting in Nea Mesimvria (Chalkidona municipality)
7.4.3 Project Response to Key Issues

As a result of the identification of environmental and socioeconomic sensitivities, some of which were informed by stakeholder feedback, minor re-routes were considered for TAP Greece. The re-routing process is reported more fully in Section 2 of the ESIA.

Stakeholder issues related to the Project impacts are provided in Section 8 within the analysis of impacts of each discipline. A summary of Project response to stakeholder issues is included at the end of Section 8 of the ESIA.

7.5 Evaluation of Consultation Effectiveness

7.5.1 TAP Greece West

This main ESIA phase of stakeholder engagement was broadly successful in meeting its objectives. Information was directly disseminated to 1,052 individuals participating in the ESIA engagement process in all the settlements within the 2 km pipeline corridor. Only one of the planned meetings was not held as described in Box 7-7.

Box 7-7 Meetings Not Held

Purgoi (Eordea municipality, Western Macedonia):

Purgoi is outside the 2 km corridor. However, a meeting was scheduled there due to the proximity with potential campsite locations. Despite the late afternoon time when the meeting was scheduled, a meeting was not held due to the fact that people were still busy with field work. Regardless of this, a meeting was held with the head of local community who provided settlement level information. The TAP AG representatives asked when it would be the best time to re-schedule the meeting and the head of the community suggested to hold it couple of months later. He said he would inform the community about the Project. The representatives left copies of the scoping report, leaflets and Q&As for distribution. They explained that it may be difficult to come back in December due to the time schedule of the Project, but they would return for the ESIA disclosure.

Source: ERM (2012)

Attendance at consultation meetings ranged from under 10 people in some villages to 40+ in others. Distribution of information about the meetings through the Heads of Communities was more effective in some villages than others, and the field team doubled the number of flyers being posted after low attendance at a few meetings. As noted in Section 7.5.2, attendance by
women at community meetings was poor. As a result, the field team scheduled additional focus group meetings with women, with an effort made to hold meetings across representative sections of the route. Focus group discussions were generally well attended and key informant interviews were well organised with much enthusiasm from participants.

TAP AG representatives also responded to a request made by the head of community in Foufas (located 2 km outside the study area) to hold a meeting not originally scheduled in order to engage with those community members who may own land within the corridor.

Many issues were raised, some of which have contributed to project design changes in terms of re-routing as mentioned earlier and which were brought into the assessment of impacts and considered in the development of the management plan.

7.5.1.1 Evaluation Method and Results

TAP used 2 ways for evaluation of consultations:

1. Orally in which consultees were asked their opinion about the quality of the meetings.
2. A participatory approach which required consultees to rate the quality of consultation by placing stickers on a poster containing 3 questions as shown in Box 7-8.

Box 7-8 Poster Evaluation Questions

1. Has the meeting been organised in a way to facilitate your attendance?
2. Were you able to ask the questions that you wanted?
3. Were you satisfied with the answers provided? Was the information provided clear and sufficient?

The options to respond to each question were yes, no and partially.

[Note: Consultees were informed that partially referred to a case when there was an aspect of the meeting that they were not 100% happy with. For example, the meeting was well organised and presentation well articulated, but responses to questions were not complete, such as value of compensation or exact plots of land affected.]
The evaluation method used was dependant on a number of elements such as practicalities regarding being able to place the poster on a wall as in Lithia where the meeting was held in the middle of the village square. In other meetings, conditions were unfavourable due to reasons such as hostility as in Nea Mesimvria relating to the compressor station [NB this compressor station site is no longer being considered in the Project design for Greece - West], or general lack of interest in the Project as in Ampelokipoi.

The results from the poster evaluation are presented in Table 7-9.

<table>
<thead>
<tr>
<th>No of Meetings where poster evaluations were held</th>
<th>Total no of participants in meetings where poster evaluations were held</th>
<th>Total no of responses</th>
<th>Has the meeting been organized in a way to facilitate your attendance?</th>
<th>Were you able to ask the questions that you wanted?</th>
<th>Were you satisfied with the answers provided? Was the information provided clear and sufficient?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Y</td>
<td>N</td>
<td>P</td>
</tr>
<tr>
<td>12</td>
<td>203</td>
<td>88 (43%)</td>
<td>57 (65%)</td>
<td>11 (13%)</td>
<td>14 (16%)</td>
</tr>
</tbody>
</table>

Key:
Y = Yes
N = No
P = Partially

Source: ERM (2012)

The results of the oral and poster evaluation suggest that overall people were satisfied with the way in which meetings were organised to accommodate attendance. However in some cases where attendance was low, it was mentioned that members of the community were busy with agricultural activities and that a different time should have been arranged to maximise attendance. For example, in Maniaki, only 6 consultees attended the meeting. In Mikron Monastirion the head of the community suggested that personal invitation letters should have been sent to individuals to facilitate more participation.

Generally consultees were satisfied with the answers that were provided and felt that they were able to ask all the questions they wanted and that sufficient time was allocated to actively participate in the Q&A session. However, there were some reservations regarding the quality of answers received, especially around compensation and land acquisition as in Rizon. Legacy issues as mentioned earlier also contributed to insecurities and cynical attitude regarding benefits of the Project. For example, in Pentavrussos consultees had reservations regarding employment opportunities.
Overall, there was much interest in the Project and participants were positive about the consultation process. They actively asked questions about the Project covering a range of issues as described above in Section 7.4.

7.5.1.2 Limitations

The main limitations identified during the main ESIA phase are as follows:

- **Working hours**: As mentioned above, although during the week meetings were conducted in the evening with most meetings being well represented, in some cases it was noted that individuals sometimes worked late into the evening preventing their attendance.

- **Representation of women**: In most cases the meetings were dominated by men in the settlement with women either being totally absent or poorly represented. This is the cultural norm in Greece. In response, the ESIA focused on holding women’s focus groups in order to hear the “female voice”. It was explained in a focus group in Variko (Kastoria municipality, Western Macedonia) that “only men discuss village issues. If a man stands and presents a problem, people will listen to him more”. Nevertheless, it is recognised that the focus groups do not adequately allow for broad information dissemination and engagement that occur through community meetings.

- **Representation of cultural groups, particularly Roma**: In the study area there are 2 locations with a Roma population. A permanent Roma camp is located close to Nea Mesimvria settlement in Central Macedonia; the population size is unknown. The second location is in Pella municipality, which is a temporary camp, where the Roma arrive in summer and leave in winter. Gaining access to the Roma community is exceptionally difficult and TAP AG representatives were informed that access is only through those who have close contact.

The team requested contact with Roma settlements through the heads of community, but they were very reluctant to assist. They were informed that there is some conflict and hostility between the local communities and Roma camps. Additionally, it was reported on the news that there had been violent incidents in the camp of Nea Mesimvria and it was therefore a health and safety risk to access the settlements without a trusted contact.

In the ESIA disclosure engagement phase particular emphasis will be placed on consulting directly with settlements which were not engaged during the main ESIA phase of the Project, including the Roma population. Further data about cultural minorities is presented in the Human...
Rights Impact Assessment - Summary and Main Findings (see Annex 8.12) that has been undertaken by TAP AG.

7.5.2 TAP Greece East

The main ESIA phase of stakeholder engagement was broadly successful in meeting its objectives. Information was directly disseminated to 1936 stakeholders participating in the ESIA engagement process in all the settlements within the 1 km or 2 km corridor. One of the planned meetings was not held because the settlement is no longer inhabited. Also, some of the planned meetings were conducted in adjacent settlements due to the lack of appropriate facilities to hold a meeting.

Two meetings were held with communities outside the study area, one due to the proximity of the compressor station to the settlement (located outside the 2 km corridor) and the other upon request of the local community (located outside the 1 km study area) to participate in the ESIA consultation and get informed about the Project. The modifications to the planned meetings' schedule are described in Box 7-9.

Attendance at consultation meetings varied between 10 people in some villages and 40+ in others. Distribution of information about the meetings through the Heads of Communities was effective. In other cases the field team doubled the number of flyers being posted and directly informed the residents about the meetings, were possible.

Key informant interviews were well organised and participation was achieved. Due to the low attendance of women at community meetings additional focus groups with women were organised.

Many issues were raised, some of which will contribute to project design changes in terms of local re-routings and will be taken into account during the further assessment of impacts as well as considered in the development of the relevant management plans.
Box 7-9 Modifications to Planned Meeting Schedule

Meetings Not Held

Scholi Astinomias (Komotini municipality, Eastern Macedonia-Thrace)
Scholi Astinomias is within the 1 km corridor. A telephone conversation with the Head of the community prior to the field trip indicated that not households are present. Regardless of that information an extra day was taken into account when scheduling the socioeconomic survey in case a meeting was required following field verification. However, Scholi Astinomias was indeed uninhabited and consequently, a meeting was not held.

Meetings Held in Nearby Settlements

Due to a small number of households in some settlements and therefore the lack of appropriate facilities to hold a meeting, such as communal building, tavern or coffee shop or the hesitation of hosting the meeting in a private house, the meetings mentioned below were held in nearby settlements merged with other planned meetings:

- Krinos (Serres municipality, Central Macedonia)
  Meeting was held in Neochori
- Pimni and Vaniano (Topiros municipality, Eastern Macedonia-Thrace)
  Meeting was held in Thalassia
- Tektonas (Avdira municipality, Eastern Macedonia-Thrace)
  Meeting was held in Diomidia
- Galini (Iasmos municipality, Eastern Macedonia-Thrace)
  Meeting was held in Iasmos
- Itea and Mesochori (Komotini municipality, Eastern Macedonia-Thrace)
  Meetings was held in Kosmio

Additional Meetings Held

Ano Kamila (Serres municipality, Central Macedonia)
Ano Kamila is located outside the 1 km corridor. However after receiving information from the head of the community that residents of Ano Kamila have properties affected by the pipeline route, a meeting was held to inform them about the Project details.

Source: ASPROFOS (2013)

7.5.2.1 Evaluation Method and Results

TAP used 2 ways for evaluating the consultations:

1. Orally, when the participants are asked for their opinion about the quality of the meetings.
2. In writing, when at the end of the meeting, the participants are encouraged to rate the quality of consultation by completing an Evaluation Form, containing 7 questions and an additional space for comments.
Box 7-10 Evaluation Form Questions

1. Overall, was the process used to seek your comments during this phase of the project (ie route selection) adequate?
2. Was the information provided to you in advance of and during this meeting sufficient for you to provide comments?
3. Was the information provided to you prior to and during the meeting presented in a manner that is clear and understandable?
4. Have you been able to provide your comments either prior to or during the meeting?
5. Was this meeting organised in a manner which made it easy for you to participate and provide comments?
6. Have you been in any way intimidated or coerced during this consultation process?
7. Have you been unduly incentivised to be supportive of the Project?

The options for responses to question 2 were fully, mostly and partly. The options to respond to all other questions were Yes or No.

Participants could provide additional comments at the bottom of the form.

The socioeconomic team provided assistance to participants by either explaining or reading the questions, where necessary. The evaluation forms can thus be used by TAP AG for future reference.

The results from the evaluation forms are presented in Table 7-10.

The results of the evaluation forms suggest that overall the people were satisfied with the way meetings were organised and that the process used to seek comments was adequate. However, according to Table 7-10, feedback was poor in relation to the number of participants that attended the meetings. This was mainly the result of

1. negative reaction towards the Project for example in Nea Mesimvria and Koptero;
2. a preference of participants to complete the forms in private and then to forward them to TAP AG; and
(3) a preference for evaluating meetings orally, in terms of being asked about the standard of organisation and quality of information with just a simple ‘yes’ or ‘no’.

Generally participants felt that they were able to ask all the questions they wanted and were satisfied with the answers provided by the Project representatives and that sufficient time was allocated to actively participate in the Q&A session. However, there were some reservations and scepticism regarding the answers received around compensation and land acquisition (eg. in Agnantia and Amaranta) mainly because of poor experiences from previous infrastructure projects. There are also some reservations regarding employment opportunities.

Overall, there was interest in the Project and participants were positive about the consultation process and showed appreciation for the Project’s efforts in this regard. They actively asked questions about the Project covering a range of issues as demonstrated above in Section 7.4.
## Table 7-10 Evaluation Form Results

| No of mtgs held | Total no of participants in meetings | Total no of responses | Overall, was the process used to seek your comments during this phase of the project (i.e. route selection) adequate? | Was the information provided to you in advance of and during this meeting sufficient for you to provide comments? | Was the information provided to you prior to and during the meeting presented in a manner that is clear and understandable? | Have you been able to provide your comments either prior to or during the meeting? | Was this meeting organised in a manner which made it easy for you to participate and provide comments? | Have you been in any way intimidated or coerced during this consultation process? | Have you been unduly incentivised to be supportive of the Project? |
|-----------------|-------------------------------------|-----------------------|-----------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
|                 | Y | N | F | M | P | Y | N | Y | N | Y | N | Y | N | Y | N | Y | N | Y | N | Y | N |
| 65              | 247 (91%) | 6 (2%) | 175 (65%) | 27 (10%) | 43 (16%) | 264 (97%) | 3 (1%) | 263 (97%) | 4 (1%) | 248 (92%) | 17 (6%) | 43 (16%) | 224 (83%) | 31 (11%) | 235 (87%) |

Key:
Y = Yes
N = No
F = Fully
M = Mostly
P = Partially

Source: ASPROFOS (2013)
7.5.2.2 Limitations

The main limitations identified during the main ESIA phase are as follows:

- **Representation of women**: In most cases the meetings were dominated by men of the settlement with women either being totally absent or poorly represented: this is the cultural norm in Greece. In response to this and in accordance with EBRD Gender Matrix\(^\text{14}\) requirements, the ESIA focused on holding women’s focus groups in order to hear the “female voice”. It was explained in a focus group in Drymos (Oreokastro municipality, Central Macedonia) that “women cannot attend a meeting if there are men there. If they participate they cannot express their opinion”. Nevertheless, it is recognised that the focus groups do not adequately allow for broad information dissemination and engagement that occur through community meetings.

- **Representation of cultural groups, particularly Roma**: In the study area two locations with a Roma population were identified, one in Mitrousi (Serres municipality, Central Macedonia) and one in Alexandroupoli (Eastern Macedonia – Thrace). Representation of Roma was not apparent in any community meetings mainly due to their nomadic way of life and the way they are viewed by the local people. It was explained in a focus group held in Mitrousi that “local people view Roma as a potential “nuisance” or source of problems” The socioeconomic team conducted focus group meetings in both locations to try to ensure that the Roma’s views about the Project were expressed.

In the ESIA disclosure engagement phase particular emphasis will be placed on consulting settlements where direct engagement did not take place with during the main ESIA phase of the Project. The Project will also consider alternative means through the media and other channels to provide information and gain feedback from individuals who are unable to attend meetings. Further data on cultural groups is provided in the Human Rights Impact Assessment – Summary and Main Findings (see Annex 8.12) undertaken by TAP AG.

\(^{14}\) The Gender Toolkit; Matrix 1 provides specific guidance and tools so that gender is mainstreamed into EBRD’s Investment and Technical Incorporation activities. The objective of this is to raise awareness of gender issues and increase positive impacts and opportunities for women and gender equality. The Gender Toolkit can be found on www.ebrd.com/downloads/sector/gender/Gender_Toolkit_Matrix1.pdf
7.6 Grievance Mechanism

TAP AG has established a Grievance Mechanism to be aware of and respond to stakeholders’ concerns and to facilitate resolution of stakeholders’ grievances in compliance with EBRD requirements and industry’s best practice. Third Party Grievance Mechanism is part of the broader process of stakeholder engagement and quality and compliance assurance. The purpose of this document is to describe the avenues that are made available to local communities, individuals and other third parties for lodging a grievance on the activity and/or consequence of the activities performed by the personnel of TAP or its contractors during the pre-construction phase of the TAP Project. This Third Party Grievance Mechanism (TAP-EXT-MA-0001) describes roles and responsibilities of the staff involved in grievance management and dispute resolution.

The grievance mechanism will address concerns promptly and effectively, using an understandable and transparent process that is culturally appropriate and readily accessible to all segments of the affected parties at no cost and without retribution.

The mechanism will not impede access to judicial or administrative remedies. Through its stakeholder engagement and the media, TAP AG has been informing stakeholders about the Project’s grievance process during each consultation phase.

The grievance management process requires the following steps by TAP AG:

- Identification;
- Registration and categorisation;
- Acknowledgement;
- Investigation/response;
- Communication of the response and request for stakeholder’s feedback; and
- Close-out.

To ensure that the grievance mechanism is inclusive and culturally appropriate stakeholders have been provided with several methods of communication to report a grievance. These are:

- **Verbally**: Stakeholders can contact the TAP AG country office based in Athens on the following number: +30 210 7454319. Verbal grievances are directed to a TAP AG
representative, who will complete a grievance form with all required details and forward it over to the relevant personnel at the TAP head office for their attention and action.

- **In writing:** Stakeholders can complete and submit a grievance form available at the country office, or more conveniently, completed forms can be submitted by email (grievance.greece@tap-ag.com) or in writing at the following address:

  Trans Adriatic Pipeline AG – Greece (Branch Office)  
  21st Floor, Athens Tower,  
  2-4 Messogion Ave.,  
  11527, Athens,  
  Greece  
  Fax: + 30 210 7454300

Any grievance is registered, reviewed and responded to. Our grievance coordinators will follow up and receipt will be acknowledged within 7 calendar days, and responded to within 30 calendar days.

A detailed description of the Grievance Mechanism is provided on TAP website in English as well as in Greek.
7.7 Monitoring and Reporting

TAP AG has created a Stakeholder and Consultation Database (SCD), which is used as a main technical tool for keeping records of all stakeholder engagement activities performed on behalf of the TAP project. All project stakeholders and consultations, as well as, the issues raised and commitments made during consultation, are registered into the database by relevant TAP and contractor staff. The SCD also includes the grievance log, which is used for registering and following up on the grievances and complaints received by TAP.

TAP is committed to incorporate stakeholder feedback into project or program design, and report back to stakeholders. This principle is adhered to during all engagements with stakeholders and is applicable for all project functions and its contractors.

TAP Stakeholder management also identifies follow-up activities, such as issues, actions, commitments, grievances, and coordinates these activities with the particular work-streams involved (TAP/ Contractors/ Sub-contractors), including the timeframes, and closure recommendations, according to the issues concerned.
7.8 Next Steps

The next phase of engagement will be ESIA disclosure. This involves dissemination and presentation of the final Integrated ESIA report in Greek to all stakeholders.

Prior to public disclosure, the ESIA will be submitted to the government. Once submitted, engagement activities will be organised to present the findings of the ESIA to a broad range of stakeholders and receive comments and suggestions. The disclosure and consultation meetings will be organised at the national, regional and local levels with the cooperation of the Ministry of Environment, Energy and Climate Change (MEECC), Forests and Water Administration and the Regional Environmental Agencies. All administrative levels from regional to village representatives will be engaged as well as the local communities, NGOs and other interested parties. Electronic and printed copies of the ESIA Report and the Non/Technical Summary will be made available to the public for review at relevant administrative offices. Electronic versions will be available on TAP’s web page. 30 days after the submission of the Integrated ESIA report to relevant authorities, TAP will hold public hearings (dates and locations will be identified and disclosed in advance). The notification of the public hearings will be announced through the media and other means of communication and the hearings will be open to the public.

An Integrated SEP will be developed prior to the ESIA disclosure process, which will combine the two existing SEP documents (TAP-FEED-GR-EIA-REP-7018 for Greece West and GPL00-ASP-642-Y-TAE-0007 for Greece East). The disclosure process will enable TAP AG to provide further information on re-routings designed as a result of stakeholder inputs during previous phases of consultation, and greater detail on Project impacts and mitigation measures. It will also provide an opportunity for further questions and answers regarding the Project, enabling continued participation of stakeholders in the Project’s decision-making process.

Comments raised by stakeholders will be documented as an addendum to the ESIA along with project clarifications on how these comments are taken into account.

Note: Communities which are based outside the study corridor, but may own land plots within the pipeline route, will be addressed with special consideration within the forthcoming stakeholder engagement activities during ESIA disclosure. Similar to the engagement activities held in the

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15 In certain areas land lots of local communities which are not located within the corridor of the socioeconomic study area might extend to the pipeline route. These will be identified during the development of the TAP LEA plan.
local communities within the study corridor, there will be settlement meetings held in all affected communities outside the study corridor to provide information about the Project, to discuss impacts and mitigation measures to answer questions and understand concerns of those that will be most affected by the Project.¹⁶

¹⁶ There may be a possibility of organising further meetings with the municipality councils along the route during this period of the ESIA disclosure tour. Depending on availability, this form of communication can accommodate all the areas of the municipality at one particular meeting, even the areas outside the study corridor.