ESIA Italy
Section 7 Stakeholder Engagement and Project Response
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7 OVERVIEW ON PRESENT AND PAST STAKEHOLDER ENGAGEMENT ACTIVITIES

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 decision-making process, express their views and influence mitigation and technical solutions to concerns voiced during the process. Stakeholders includes affected communities, enterprises and individuals, community organizations, local authorities, non-governmental organizations (NGOs), media, think-tanks, national and regional governments and general public.

Stakeholder engagement is an inclusive and culturally appropriate process which involves the two-way sharing of information and knowledge, seeking to understand the concerns of others and building relationships based on collaboration. It allows stakeholders to understand the potential risks, impacts and opportunities of the project in order to achieve positive outcomes. The European Bank for Reconstruction and Development (EBRD)'s perspective on stakeholder engagement is described below.

Box 7-1 EBRD Perspective on 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.” (1)

Source: EBRD (2010)

The main objectives of stakeholder engagement are: i) to ensure that adequate and timely information is provided to those affected by a project; ii) to provide these groups with sufficient opportunity to voice their opinions and concerns; 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 since 2006, when the TAP Project was announced at the national and regional level. Engagement has continued in alignment with the following national and international requirements/guidelines:

- Legislative Decree 152/06, as modified by Legislative Decree 4/08 and Legislative Decree 128/10;(2)
- Performance Requirements (PR) of the European Bank for Reconstruction and Development (EBRD);

(2) The Italian legislation refers to Environmental Impact Assessment (EIA) rather than to Environmental and Social impact Assessment (ESIA). However, the EIA to be produced by TAP AG will include social aspects as required by the EBRD performance standards. Moreover, TAP AG decided to undertake the Scoping procedure and to carry out public consultation and information disclosure activities in all countries crossed by the project, including Italy where the Scoping procedure and the information disclosure activities are not mandatory according to the National legislation.
• Article 6 of the UN Economic Commission for Europe (UNECE) Aarhus Convention: Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters;

• UN Convention on Environmental Impact Assessment (EIA) in a Transboundary Context – the Espoo Convention;

• TAP AG’s corporate standards, including their Code of Conduct;

• TAP AG’s CSR Policy and Stakeholder Engagement Strategy.

Each of these requirements is described in detail in the Stakeholder Engagement Plan (SEP) for the Italian section of the Project route, which will be updated after the delivery of the ESIA to the relevant authorities. Since the commencement of the Project screening and alternatives assessment processes in 2006, TAP AG has been engaging with stakeholders in Italy with the aim of understanding the views of interested parties so that these can be taken into account in the project design and implementation. The SEP presents the activities undertaken in the engagement process for the Project.

The SEP is a “live document” that is updated and adjusted as the ESIA progresses and project planning evolves. Reports on the completion of each ESIA phase form integral parts of the SEP.

Discussions with stakeholders included consultations with affected communities, enterprises and individuals, community organizations, local authorities, non-governmental organizations (NGOs), media, universities, research centres, national and regional governments and general public. This ESIA report was prepared taking into account the results of the consultations.

Stakeholder identification has been an on-going process which has evolved as the Project has been refined and affected parties/communities identified. Various types of engagement were conducted to ensure that information regarding the Project was disseminated to all stakeholders, including vulnerable groups. These were as follows:

• Meetings (bilateral or group meetings) to provide information about the Project, to discuss impacts and mitigation measures and answer questions and understand concerns of affected and interested stakeholders.

• Focus group discussions and key informant interviews primarily to collect baseline data but also to act as a forum for these groups to communicate their opinions and concerns regarding the Project.

• Information pages in main local newspapers in order to disseminate information about the Project and let people know about TAP information desks at the main open air markets.

• Information desks at the main open markets in different settlements of the affected area.

• Letters to the households of Melendugno to provide information about the Project and ESIA activities and surveys.
This Section focuses on stakeholder engagement that has been undertaken in support of the ESIA phase. It is divided into the following sections:

- Engagement approach and outcomes of previous phases;
- Engagement approach and outcomes of ESIA phase;
- ESIA disclosure and consultation;
- Evaluation of engagement effectiveness;
- Grievance mechanism; and
- Next steps.

7.2 Engagement Approach and Outcomes of Previous Engagement

7.2.1 Engagement Approach

As described in Section 2 Project Justification, the analysis of Project alternatives has been an ongoing process since 2006. The process of stakeholder engagement to support the TAP ESIA has been carried out over the intervening period and is being undertaken through six phases which are shown in Figure 7-1. As shown in the figure, Phases 1-5 have been completed; Phase 6 is planned, and will be performed after submission of the ESIA to the relevant authorities. It should be noted that – as a result of the consultations process with the stakeholders - the Base Case has undergone a number of significant changes over the course of the assessment, hence reference to an “old route” (alternative 0) which was then entirely superseded by the “new route” (optimized alternative 0) and associated facilities, including landfall and Pipeline Receiving Terminal (PRT). For more details, see Annex 2.
7.2.2 Phase 1: Pre-Scoping

Phase 1 was the initial step in launching the TAP Project at a national and regional level which involved introductory meetings with authorities between 2006 and 2008. The consultation included meetings with the following stakeholders:

- The Ministry of Environment, Land and Sea Protection;
- Ministry of Economic Development; and
- Local government representatives of the Apulia Region.

Discussions were predominantly focused around Project authorisation and approval to proceed with the permitting process and the ESIA studies.
7.2.3 Phase 2: Route Refinement

Phase 2 included a period of intensive fieldwork and stakeholder engagement to introduce the proposed Project to potentially affected stakeholders and gather information pertinent to the route refinement process.


Box 7-2 Phase 2: Outcome of Route Refinement and Alternative

'Alternative 0' was considered to represent the optimal solution in terms of technical viability, safety and environmental, socioeconomic, land-use and cultural heritage impacts relative to Alternatives 1-4 which all presented greater challenges particularly with regard to potential environmental impacts and interference with official planning zones. TAP AG therefore decided to use Alternative 0 as the Base Case for its further planning and approval process in Italy.

Source: ERM (2011)

After selection of Alternative 0 as the "Base Case", a public disclosure program of meetings was carried out between March and May 2011 involving national and local level institutions (including municipality representatives), NGOs and business associations. The meetings informed these stakeholders about the results of the route selection process and the location of the proposed route corridor.

7.2.4 Phase 3: Scoping

Phase 3, Scoping, commenced in 2011 following the identification of the preferred route, with the aim of defining the required scope of the ESIA. Scoping disclosure engagement was carried out in July 2011 with the participation of government and NGO representatives and local authorities, including regional authorities and heads of municipalities. In addition to local and regional engagement activities, meetings also took place in Rome with national government representatives.

During this phase, the main channel of communication with local communities was through the local authorities. Heads of municipalities were provided with materials to support them to inform their communities of the scoping process and provide channels for communication back to the Project. The publication of the Scoping Document was announced in national and local newspapers to ensure all community members and other local interested parties were informed about the Project and the ESIA Scoping process as well as the mechanism to provide comments. Copies of the Scoping Document were made available on the internet and at each municipality’s seat, along with posters and leaflets about the Project.

Overall, the results of the engagement process indicated that the stakeholders (national, regional and local institutions, NGOs, research centres, media, agricultural associations, fishermen cooperatives, tourist associations, and trade unions) were open to engage with the Project. During the engagement, a number of issues were raised as summarised in Table 7-1.
### Issue Raised

**Concerns regarding natural resources:** At the meeting in Lecce, Province authorities emphasized the importance of Regional Law on the protection of the monumental olive trees regulating their replanting and treatment. The department in charge is the Regional Agriculture Inspectorate (Ispettorato Regionale dell’Agricoltura) to which TAP AG must submit its plan for replanting monumental olive trees. The same department will issue the authorization needed for non-monumental tree replanting. Additionally, the environmental assessment studies should include the existing regional and provincial special plans.

**Concerns regarding sea turtles:** It was highlighted during the meetings with WWF and Legambiente that the coastal area close to the landfall is particularly important as it relates to the protection of sea turtles (*Caretta caretta*). The coastal area close to Lido di San Basilio has been identified as crucial for turtle nest building. The nest-building period in this area is mid June – mid July.

**Emergency preparedness and response:** Emergency plans relating to fires, earthquakes, landslides etc. need to be established and capacity to cope needs to be increased. For example, at the meeting in Lecce the Provincial Office of the Fire Department authority, stressed that the risk analysis and protection measures shall be specified in the documentation to be submitted, and that the document shall also include details on the gas leakage detection systems.

**Upgrades and impacts relating to infrastructure:** Details on the reinstatement of the dry stone walls were requested. It was also suggested that TAP AG should avoid the construction of new roads and foresee the use of existing agricultural roads (known as ‘white roads’).

*Source: ERM (2011)*

Many of these themes continued into the main ESIA phase engagement as presented in Section 7.3.5 (Outcomes of ESIA Engagement) in which consultation was carried out with affected parties/communities along the pipeline route.
7.3 **Phase 4: ESIA Stakeholder Engagement Activities on Alternative 0**

7.3.1 **Objectives**

Phase 4 was carried out between October 2011 and September 2012 and complemented the scoping engagement held in July 2011 to ensure stakeholders had an opportunity to learn about the Project, to ask questions and raise concerns. The engagement was also used to gain information of importance in assessing potential impacts and the development of mitigation measures.

7.3.2 **Stakeholder Identification**

The SEP defines a stakeholder as ‘any individual or group who may be directly or indirectly affected by the Project, as well as those who may have an interest in or influence over the project’. The objective of stakeholder identification is therefore to establish which organisations and individuals may be directly or indirectly affected (positively and negatively) by the Project, namely (“affected parties”) and those that may have an interest in the project (“other interested parties”). 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 impacted 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 identify the key objectives of engagement.

*Table 7-2* presents the stakeholders who were identified as relevant for the main ESIA phase.
### Stakeholder Groups on Route ‘Alternative 0’

<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>Local communities, including village and Municipality heads within the 2 km corridor – 2 in total</td>
<td>Will receive impacts (positive or negative) as a result of the Project.</td>
</tr>
<tr>
<td>Groups within the 2 km corridor:</td>
<td></td>
</tr>
<tr>
<td>• Women</td>
<td>May have expectations regarding development and benefits in their local area.</td>
</tr>
<tr>
<td>• Senior citizens</td>
<td></td>
</tr>
<tr>
<td>• Tourism businesses</td>
<td></td>
</tr>
<tr>
<td>• Farmers / land owners / olive growers</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>• Fishermen</td>
<td></td>
</tr>
<tr>
<td><strong>Other interested parties</strong></td>
<td></td>
</tr>
<tr>
<td>Authorities and institutions:</td>
<td></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></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>Key Informants:</td>
<td></td>
</tr>
<tr>
<td>• Agencies responsible for economic sectors (urban planning / local development, fishing, labour, agriculture)</td>
<td>May have expectations regarding development and benefits for the country or in the local area.</td>
</tr>
<tr>
<td></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>Local NGOs</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Raise concerns about the project and/or facilitate contacts with local communities.</td>
</tr>
<tr>
<td></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>
</tbody>
</table>

**Source:** ERM (2011)

#### 7.3.3 Engagement Activities

Engagement activities were conducted to ensure that information regarding the Project was disseminated to all stakeholders, including vulnerable groups. These were as follows:

- Meetings within the 2 km corridor to provide information about the Project, to discuss impacts and mitigation measures and answer questions and understand concerns of affected stakeholders.
- Focus group discussions and key informant interviews primarily to collect baseline data, but also to act as a forum for these groups to communicate their opinions and concerns regarding the Project.
7.3.4 Format for Consultation Meetings

Consultation meetings involved a presentation of the Project followed by a question and answer session. Focus groups and key informant interviews were guided by a protocol 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.

A description of all the communication materials used for ESIA consultation and their purpose are summarised in Table 7-3. These tools are presented in the SEP.

Table 7-3 Communication Materials

<table>
<thead>
<tr>
<th>Material</th>
<th>Description</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Presentation</td>
<td>Presentation of the ESIA process, Project description, Project progress to date, future plans, timeframes, expected impacts and mitigation measures</td>
<td>Disclosure of impacts and consultations on mitigation measures.</td>
</tr>
<tr>
<td>Leaflet</td>
<td>Two-page leaflet summarising the Project, the ESIA process and future plans. Also provides contact details for TAP.</td>
<td>Allow stakeholders to take information home and have TAP contact details for later comments or questions.</td>
</tr>
<tr>
<td>Poster</td>
<td>One-page poster notifying the date, time and location of consultation meeting.</td>
<td>To ensure that stakeholders are aware in advance of the meeting.</td>
</tr>
<tr>
<td>Q&amp;A</td>
<td>A double-sided sheet of frequently asked questions about the project.</td>
<td>To ensure stakeholders are provided with basic project information.</td>
</tr>
<tr>
<td>Media</td>
<td>A short advertisement notifying the date, time and location of consultation meeting.</td>
<td>To ensure that stakeholders are aware in advance of the meeting.</td>
</tr>
</tbody>
</table>

Source: ERM (2011)

7.3.5 Main Outcomes

In addition to the outcomes of Phase 3, the new round of engagement activities provided additional feedback for the Project, in the framework of ESIA field surveys. These outcomes are summarized in the table below and have been taken into account in the ESIA report.

Table 7-4 Phase 4: Outcomes

<table>
<thead>
<tr>
<th>Issue Raised</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concerns regarding business activities: Stakeholders in the tourism business expressed concerns about the impact of the Project on their business activities.</td>
</tr>
<tr>
<td>Concerns regarding natural resources: Worries about sea pollution and rock erosion with subsequent visibility of the pipe and danger to ground stability. A few fishermen raised concerns about potential leaks which could cause long term damage to the marine environment.</td>
</tr>
<tr>
<td>Alternatives to PRT location: Concerns regarding the location of the PRT in the municipality of Vernole; preferences were expressed for the area of Melendugno.</td>
</tr>
<tr>
<td>Communication regarding project: A local authority pointed out that there should be some informational material, maps and documents with information about the pipeline safety in emergency situations. Other stakeholders would like to know what the economic gains would be for the citizens and for the territory, in terms of jobs and investments.</td>
</tr>
</tbody>
</table>

Source: ERM (2011)
7.3.6 Project Related Impacts and Benefits

During the Main ESIA phase of engagement, issues were raised related to potential Project impacts and benefits. These comments have been broadly categorised into the following areas (a full list of issues will be included in the SEP):

- **TAP Project**: A diverse range of questions were raised to gain further clarity on aspects of the Project particularly around the routing and location of the PRT and block valve station.

- **Other impacts and their management**: Questions were raised with regard to how a range of impacts would be managed. Examples include: noise and disturbance, potential contamination of water resources; interaction with local development areas and tourism and agriculture activities; cultural heritage.

- **Project benefits**: Stakeholders asked questions with regard to benefits that they might receive from the Project. Sometimes, these questions were articulated as community needs. Key areas of benefit raised were: road improvements; improvement to community infrastructure.

- **Purchase of gas**: The potential that the Project would improve access to gas was raised by a few stakeholders. Some of those consulted were also interested in the source of the gas.

- **Health & safety**: There was some concern with regard to health or safety implications of the gas pipeline and associated facilities.

**Stakeholder information and information disclosure**: Stakeholders were pleased to see TAP engagement activities and very keen to remain informed about the Project and be able to provide further views as the Project plans develop.

- **Vegetation**: the crossing of *macchia Mediterranea* (a regionally endemic shrubland) was indicated as a significant issue

- **Geological stability**: it was observed that the karst geology of the area might not ensure the necessary terrain stability for the project construction.

- **Impact on landscape**: it was observed that the PRT would have a significant impact on the landscape, which is a valuable feature of the tourism appeal of the area.

- **Tourism**: there was some concern with regard to the Project impact on the development of tourism activities in the area. The major concern was that the Project could indirectly stimulate investment in the industrial sector, while stakeholders would like to develop the tourism sector.
7.4 ESIA Submission and Follow up

From early 2012, consultations increased, in order to prepare the first ESIA submission and disclosure (March 2012). During this phase, relevant developments took place, such as:

a. A community meeting was held in the Municipality of Melendugno in February 2012. The meeting was intended to present the Project to the community and to collect suggestions and feedback from stakeholders, however, the negative attitude of some participants did not allow for effective and cooperative discussions.

b. The municipal councils of Vernole and Melendugno expressed negative opinions on the Project:
   - Municipality of Melendugno, (resolution n° 5 of 29/02/2012)\(^1\)
   - Municipalities of Vernole (resolution n° 5 of 18/05/2012)

Also the municipal councils of Castrì di Lecce (n° 2 of 21/04/2012) and Caprarica di Lecce (resolution n°13 of 19/06/2012) passed similar resolutions.

c. From January 2012, the appearance and the spreading of a local grouping opposed to the Project known as “NO TAP”;

d. In March 2012, the ESIA was submitted to the relevant authorities. However, concerns on the Project expressed by key stakeholders suggested re-considering some aspects of the route design.

e. The Ministry of Cultural Heritage (MCH) expressed concerns in relation to the proposed PRT location, because this was found to fall within the landscape protection area (Coastal and Territorial area of Melendugno, acknowledged by the Decree 42/2004, Art.136, Paragraph 1, letter c and Law 1497/39). Given this constraint, the MCH highly recommended that TAP AG relocate the PRT outside this constrained area.

f. TAP asked for the suspension of the ESIA procedure in order to bring about improvements to the technical Project and keep a positive dialogue with local and regional authorities, as well as with the local community. The Ministry of Environment granted three consecutive suspensions of the EIA procedure for 3 months (19 June 2012), 3 months (24 September 2012) and 9 months (14 December 2012).

g. On September 18\(^{th}\), 2012, the board of the Apulia region expressed a negative opinion on the first draft of the ESIA (Resolution 1805 of 18/09/2012).\(^2\)

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\(^1\) TAP appealed against the resolution of the Municipality of Melendugno. The judge annulled the resolution.

\(^2\) TAP appealed against the resolution of the Apulia region because, among other reasons, expressed a technical negative opinion on the Project in a phase of suspension of the EIA procedure.
h. Concerns were received from the Basin Authority, which expressed a technical negative opinion on the identified landfall option.

### 7.5 Phase 5: ESIA Stakeholder Engagement Activities on Optimized Alternative 0

#### 7.5.1 Preliminary Steps

Keeping in mind the recommendations of the different stakeholders, TAP AG proceeded to optimize the design of “Alternative 0”. With the new Project, the landfall was moved a few hundred metres southwards to avoid potential problems with coastal erosion and potential cliff fragility. Additionally, the Pipeline Receiving Terminal (PRT) was located 8 km inland, within the Municipality of Melendugno. This decision was taken in order to avoid direct impacts on two different municipalities and to avoid direct interferences of the PRT with the landscape constrained area. More details on the process of route refinement can be found in Section 2 Project Justification and the associated Annex 2 Alternative Assessment.

Engagement activities were conducted to inform the stakeholders about the optimization of Alternative 0, comprising the change of landfall, onshore pipeline route and PRT footprint. The Project disclosed to national, regional and local stakeholders, including the citizens of Melendugno, the geographical details of the new footprint before the ESIA consultations (see Phase 6).

Between October 2012 and July 2013, TAP AG conducted 167 meetings with national, regional and local stakeholders.
Figure 7-2  TAP Meetings between October 2012 and July 2013

The highest number of meetings was held with local institutions, both political and technical. The first group includes representatives of the Municipality of Melendugno, Vernole, Brindisi and Lecce. The second group comprises a number of diversified technical bodies, such as the Superintendence for Cultural Heritage, the Basin Authority, the local police, the fire brigades, the Lecce prefecture, etc.

At the institutional level, TAP AG consulted regularly with regional and national authorities (e.g. Ministry of Environment). Other important targets of the stakeholder engagement strategy include economic operators (tourism, agriculture, and fishing), workers and business representatives (Confindustria, ANCE, Coldiretti, Assobalneari, labour unions and cooperatives, etc.).

To follow up on community concerns, mostly of an environmental nature, the Project also consulted with NGOs and research centres and organized information points at local markets to facilitate a direct contact with members of the local communities.

Out of the 167 stakeholder engagement meetings, 24 refer to interviews, focus groups and information sessions that were conducted in the framework of ESIA field surveys. The outcome of ESIA consultations are collected in the Table 7-5.
7.5.2 Stakeholder Identification Process

Considering the relative proximity of the “new route” to the “old route” the identification of new stakeholders entailed no significant changes at the institutional level, and minor changes in the local community level (see Table 7-5).

Table 7-5 Identification of Stakeholders on the new route

<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>Local communities, including village and heads within the 2 km corridor – 2 in total</td>
<td>Will receive impacts (positive or negative) as a result of the project. May have expectations regarding development and benefits in their local area.</td>
</tr>
<tr>
<td>Groups within the 2 km corridor:</td>
<td></td>
</tr>
<tr>
<td>• Women</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>• Senior Citizens</td>
<td></td>
</tr>
<tr>
<td>• Youth</td>
<td></td>
</tr>
<tr>
<td>• Tourism businesses</td>
<td></td>
</tr>
<tr>
<td>• Farmers / land owners / olive growers</td>
<td></td>
</tr>
<tr>
<td>• Fishermen</td>
<td></td>
</tr>
<tr>
<td>Other interested parties</td>
<td></td>
</tr>
<tr>
<td>Authorities and institutions:</td>
<td></td>
</tr>
<tr>
<td>• Heads of municipalities</td>
<td>Representatives of the municipalities being consulted. May have expectations regarding development and benefits for the country or in the local area.</td>
</tr>
<tr>
<td>• Key Informants:</td>
<td>May have expectations regarding development and benefits for the country or in the local area. 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>• Local CSOs and Associations</td>
<td>May have expectations regarding development and benefits for the country or in the local area. 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>
</tbody>
</table>

Source: ERM (2013)
7.5.3 Stakeholder Engagement Activities

Various types of engagement activities were conducted to ensure that information regarding the Project was disseminated to all stakeholders, including vulnerable groups. These activities were structured as follows:

- Face to face meetings within the 2 km corridor to provide information about the Project, impacts and mitigation measures, to answer questions and identify the concerns of stakeholders.
- Focus group discussions and key informant interviews to collect baseline data, as well as to allow these groups to communicate their opinions and concerns regarding the Project.
- Dissemination of communication materials: letters to the households of the municipality of Melendugno, media campaigns, information desks at the municipal markets of San Foca and Melendugno to inform the local population about new ESIA surveys, provide clarifications on the Project, discuss issues and concerns.

These activities were intended to replace community public meetings, which – based on previous experience - seemed less effective in encouraging an open and measured engagement process.

7.5.4 Format for Consultation Meetings

Consultation meetings involved a presentation of the Project followed by a question and answer session. Focus groups and key informant interviews were guided by a protocol 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. TAP AG maintained the leadership on the stakeholder engagement process. For this reason field survey teams established a good cooperation system with TAP community liaison officers in order to ensure the consistency of the overall engagement process.

A description of all the communication materials used for ESIA consultation and their purpose are summarised in Table 7-3.
Table 7-6 Communication and Information Materials

<table>
<thead>
<tr>
<th>Material</th>
<th>Description</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Presentation</td>
<td>Presentation of the ESIA process, project description, project progress to date, future plans, timeframes, expected impacts and mitigation measures</td>
<td>Disclosure of impacts and consultations on mitigation measures.</td>
</tr>
<tr>
<td>Prefectural Decree</td>
<td>Description of the activities conducted during the ESIA field surveys with the names of the experts entitled to enter private properties.</td>
<td>Inform people about authorized ESIA survey activities.</td>
</tr>
<tr>
<td>Maps</td>
<td>Large scale folded maps with cadastral data and the footprint of the pipeline and the PRT.</td>
<td>Give precise indications to landowners and users who are directly affected by the Project.</td>
</tr>
<tr>
<td>Brochure</td>
<td>Six-page brochure in Italian summarizing the project, the ESIA process and future plans, including contact details for TAP.</td>
<td>Allow stakeholders to take information home and have TAP contact details for later comments or questions.</td>
</tr>
<tr>
<td>Poster</td>
<td>One-page poster informing stakeholders of the dates, times and locations of consultation meetings.</td>
<td>To ensure that stakeholders are aware in advance of the meetings.</td>
</tr>
<tr>
<td>Q&amp;A</td>
<td>A double-sided sheet of frequently asked questions about the project (in Italian).</td>
<td>To ensure stakeholders are provided with basic Project information.</td>
</tr>
<tr>
<td>Media</td>
<td>A short advertisement informing stakeholders of the dates, times and location of consultation meetings.</td>
<td>To ensure that stakeholders are aware in advance of the meetings.</td>
</tr>
</tbody>
</table>

Source: ERM (2013)

7.5.5 Main Outcomes

During field surveys, the Project took the opportunity to collect information on local socio-economic conditions, as well as stakeholders’ feedback on the Project. The outcome of this process is reported in the Table 7-7.

The Table distinguishes between main and other issues, based on:

a. The number of times that the issue was discussed during interviews and meetings;

b. The importance attributed to the issue by the stakeholders in expressing their views about the Project.
## Table 7-7  Phase 5: Outcomes of meetings during ESIA field surveys

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Other Issues</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Industrialization</strong> - A considerable number of interviewees expressed concerns over the co-existence of the Project with agriculture and tourism-led economic development. Some people fear that the Project might give birth to an industrialization process, and ask TAP to consider already existing industrial areas.</td>
<td><strong>Cultural Heritage</strong> – A few community members have expressed concerns on the preservation of cultural heritage sites in the proximity of the route (i.e. Dolmen Placa, Basilica di San Niceta, Monumental Olive Groves).</td>
</tr>
<tr>
<td><strong>Decrease of Tourism Flow &amp; Investment</strong> - Stakeholders in the tourism business voiced concerns about the possible impact of the Project on their business activities. Some people reported that San Foca might lose appeal to tourists in favour of other areas in Salento, as a consequence of negative tensions that the opposition to the Project could enflame.</td>
<td><strong>Mistrust</strong> - Based on previous negative experience, some stakeholders expressed doubts over the long-term commitments of the private sector to live up to the sustainability standards originally set, and over the capacity of the public system to protect community health and environment in the long run.</td>
</tr>
<tr>
<td><strong>Pollution and Environment Preservation</strong> – Some stakeholders formulated worries about sea pollution, deterioration of air quality (mainly PRT emissions), ground and landscape degradation. A fewer number of people reported their adversity to whatever project might cause an environmental change to the status quo.</td>
<td><strong>Gas Price</strong> - The potential that the Project would improve access to gas was raised by a few stakeholders.</td>
</tr>
</tbody>
</table>

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*Source: ERM (2013)*

Views from the field are also covered in the blue boxes of Section 6 (Socio-Economic Baseline).
7.6 Phase 6: ESIA Disclosure and Consultation

7.6.1 Objectives

The objective of this phase of engagement is to present stakeholders with the ESIA report. This includes providing information on the project impacts and mitigation measures designed to avoid, minimize or, in case of positive impacts, to enhance them.

The ESIA Disclosure is aimed at reaching the highest possible number of stakeholders. This includes all stakeholders identified during the main ESIA phase (see Section 7.3.2) and additional ones, as necessary. Media will also be involved in the disclosure program to ensure the highest possible outreach of the information campaign.

7.6.2 Engagement Activities

ESIA Disclosure activities will be conducted after the delivery of the ESIA to the Italian Ministry of Environment (September 2013) at national, regional and local level. These activities will continue during and after preparation of the eventual ESIA integrations.

Engagement is mainly being performed through face-to-face meetings with institutions, and individual stakeholders. Other engagement activities (i.e. participation in municipal markets, letters to the citizens, socio economic surveys, people’s perception survey (SWG), supplemented interviews and focus groups.

In line with EBRD requirements and stakeholder engagement international best practices, once the ESIA has been finalized the disclosure program will be further extended including a presentation to public meetings and media. Feedback collected during the engagement activities of the disclosure phase will be taken into consideration in the implementation of the Project.

7.7 Evaluation of Consultation Effectiveness

Stakeholder feedback is an aspect that informs the evaluation of impacts and the development of mitigation measures. As underlined in the previous paragraphs, some local stakeholders reported a lack of information and communication on the project. A limited number of stakeholders - including some local authorities, civil society organizations, fishermen and tourist operators - refused to interact with the Project in the ESIA framework.

The outcome of the main stakeholder engagement phase reports issues that had generally emerged during earlier rounds of engagement activities. Therefore, TAP AG has already intercepted what are the main driving forces behind people’s concerns regarding the Project.

As a consequence TAP AG is continuously working with the community in order to inform how their concerns can be dealt within the framework of the social and environmental management plans, as some of the concerns keep returning during stakeholder engagement activities in different stages of the Project.
Only fishermen filed official grievances against the Project (see following paragraph for description of grievance mechanism).

7.8 Grievance Mechanism

7.8.1 Objectives
TAP AG’s Third Party Grievance Mechanism is part of TAP AG’s broader process of stakeholder engagement, accountability, quality and compliance assurance and its Corporate Social Responsibility. The purpose of the document is to describe the avenues that are made available to local communities, individuals and other third parties for logging a grievance on the activity and/or consequence of the activities performed by the personnel of TAP AG, its contractors and/or subcontractors during the pre-construction phase of the TAP Project. This document also describes roles and responsibilities of staff involved in grievance management. The objectives of this mechanism are to:

- Minimize the need for judicial or administrative proceedings; provide communities, individuals and other stakeholders with a straightforward, prompt, culturally appropriate and readily accessible way for voicing, logging and redressing grievances;

- Provide communities, individuals and other stakeholders with predictable, transparent and credible processes resulting in fair, effective and lasting outcomes at no cost and without retribution to themselves drawing upon customary systems of conflict and dispute resolution, such as mediation, conciliation and arbitration;

- Ensure that TAP AG grievance management is in full compliance with EBRD performance requirements and industry best practice and therefore delivers on TAP AG’s public commitments including but not limited to its CSR Policy;

- Ensure that feedback is provided to the complainant in a timely manner, that appropriate corrective actions are effectively implemented and that fair compensation for experienced hardship are provided in due time.

7.8.2 Defining a Grievance
A grievance can be described as a real or perceived wrong or hardship suffered that is the grounds of a complaint. A grievance differs from a concern, feedback, suggestion, question etc. while often confused with these and/or raised in combination. Best practice therefore suggests clarifying (in dialogue with the submitting party, if necessary) the nature of each submission to avoid the grievance mechanism becoming overloaded with other requests and/or communications.

A grievance can be submitted by an individual, a group of individuals and/or one or more organization(s), who claim that the activities associated with the TAP Project or its staff or contractors acting on behalf of TAP AG have caused wrong or hardship to the complainant’s health, property, livelihood natural environment, rights, culture, believe system etc.
This mechanism is also applicable to groups such as national and international NGOs and common interest groups as well as enterprises, companies, service providers and suppliers.

7.8.3 Grievance Administration

TAP AG’s grievance redress process has the following steps:

**Figure 7-3 TAP AG’s Grievance Redress Process**
a) Receiving grievances;

The Project can receive a grievance verbally or in written form, including website, e-mail accounts, mail addresses, SMS grievance boxes, FAX, telephone, walk-ins, personal meetings, regional and local offices.

b) Translation, completion, clarification, logging and acknowledgement;

Upon receiving a grievance, a Grievance Co-ordinator is in charge of translating the document into the Project language (i.e. English), reviewing and identifying any missing or unclear information and, if needed, clarifying information gaps through dialogue with the complainant.

The grievance is registered and referenced in a specific Database. The Grievance Co-ordinator is in charge of processing the case and providing an acknowledgement of receipt within 7 calendar days with preliminary observations on the viability of the process within 7 calendar days.

c) Sorting and processing (verify, investigate and act);

Based on investigations and verifications conducted by the Grievance Co-ordinator, the Grievance Manager decides – in close consultation with the relevant Work-stream Manager - whether to accept, partially accept or reject the grievance.

An acceptance or rejection letter will be sent to the complainant within 21 calendar days of the issuing of the acknowledgement letter. All correspondence as well as minutes of all meetings with the complainant, witnesses, work stream managers etc. must be logged in the Grievance Database.

d) Feedback and follow up;

If the complainant agrees, the grievance will be closed out in the Grievance Log with the complainant’s agreement and feedback recorded using a Final Closure Agreement Form.

If the decision is not acceptable to the complainant, the relevant Grievance Coordinator will assist the complainant to file a request for mediation in the second tier of the Grievance Mechanism and remind the complainant about the administrative or judicial proceedings available under the relevant country legislation.

If a grievance is rejected, the relevant Grievance Co-ordinator will contact each complainant within 7 days after the Rejection Letter has been sent to explain the decision, outline potential next steps and options and obtain feedback whether the decision is accepted by the complainant:

- If the complainant agrees, the grievance will be closed out in the Grievance Log with the complainant’s agreement and feedback recorded using the Final Closure Agreement Form.
- If the decision is not acceptable to the complainant, the relevant Grievance
Co-ordinator will assist the complainant to file a request for mediation in the second tier of the Grievance Mechanism and remind the complainant about the administrative or judicial proceedings available under the relevant country legislation.

e) Corrective actions;

After a grievance is accepted or partially accepted, the Grievance Manager will investigate the grievance in close collaboration with the relevant Work-stream Manager and Grievance Co-ordinator and decide what corrective actions are required in response to it.

f) 2nd tier grievances (mediation process);

If a complainant is dissatisfied with the decision of the Grievance Manager, the outcome of the corrective action plan and/or the way how the grievance has been handled, the complainant may file a request for mediation to arrive at a mutually acceptable solution.

To support this process, TAP has established in each host country an independent second tier Grievance Mechanism that consists basically of a Mediation Panel. The members of the panel are experts in areas that are expected to cause most of the grievances (environmentalist, land access specialist, social experts, procurement experts etc.) and/or highly regarded individuals of high moral integrity. People that have worked for TAP are not eligible to become Panel Members and active Panel Members cannot work and/or cooperate with TAP in any other function.

Mediation is a flexible process, designed to be as straightforward and comfortable as possible, but it often follows a set pattern:

- Step 1 – Individual meeting with the complainant(s);
- Step 2 – Meeting between TAP and the Mediator;
- Step 3 - Joint mediation;
- Step 4 - Concluding the mediation process;
- Step 5 - After mediation.

g) Monitoring and reporting.

Paper copies of each grievance and supporting documentation will be kept in DCC recording system. An electronic version of the grievance form will be filled out in the Grievance Log, which is the part of the larger Stakeholder and Consultation Database (SCD) and will be used for recording and tracking all grievances.

The Grievance Managers will complete regular reviews of grievances to provide assurance that complaints are being addressed appropriately and in a timely fashion.

The three Grievance Managers will establish Annual Grievance Reports to inform the public about the number and nature of the grievances received the outcomes etc.
7.9 Next Steps

The process of stakeholder engagement will continue after the delivery of the ESIA on a regular basis and its public disclosure. TAP AG will continue to hold meetings with national, regional and local stakeholders and renewed efforts will be made to reach out to those stakeholders who are currently unwilling or unavailable to engage in an open dialogue with the Project.

TAP AG has already committed to produce and make available further documentation, including a revision of the Stakeholder Engagement Plan. Other documents intended to facilitate a socially sustainable approach and a continued engagement process with affected communities include – but are not limited to - a Land Easement and Acquisition Plan (with a study on compensation values), a Livelihood Restoration Framework, a Social-Environmental Investment Plan based on the results of a Needs Assessment Study, an Emergency and Preparedness Plan and new Communication Activities. A description of TAP AG’s environmental and social management plans can be found in Section 9 of this report. TAP commits to continue the engagement process with the community in the elaboration and implementation of management plans (i.e. infrastructure, workers, social investments, livelihoods restoration, etc.).

In defining the documents mentioned above, TAP AG will be guided by the outcomes expressed by the stakeholder community during the ESIA consultation phase and by the ongoing stakeholder engagement process.