

## Appendix C Public Consultation and Disclosure



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# 1 INTRODUCTION

This document is the Public Consultation and Disclosure Plan (PCDP) for the Environmental and Social Impact Assessment (ESIA) of the Western Route Export Pipeline Sectional Replacement Project (WREP-SR) in Georgia. The Project is being managed by BP, who operates the WREP on behalf of the Georgian Pipeline Company (GPC).

It is BP's intention to be transparent about the Project; to share global knowledge and lessons of experience with the widest possible audience; and to enhance the quality of its operations by engaging with a broad range of stakeholders. The provision of this information will be balanced with the operational and commercial need for some aspects to remain confidential.

This PCDP presents and describes the stakeholder disclosure and consultation procedures that have been undertaken as part of the ESIA process. For ease of reading, the term 'consultation' is used in this document to cover both disclosure and consultation activities.

Good stakeholder consultation assists in building strong relationships with stakeholders, based on mutual respect and trust, and increases the likelihood that projects are well designed and responsibly implemented. It reduces the risk of delays in project approval and permitting processes, and the need for costly redesign of operations/facilities. Such consultations should be conducted on a "free, prior and informed" basis (International Finance Corporation, 2006), meaning that stakeholders enter into consultations without coercion, and that they have been given adequate information upon which they can comment before key project decisions are made.

This PCDP draws on the experience of stakeholder engagement, and understanding of stakeholder concerns that BP has gained over nearly two decades. BP has been operating in Georgia since the mid 1990s and has carried out extensive stakeholder consultation programmes associated with its major developments. Therefore, BP has well-established relationships with many stakeholders, upon which it will build for the WREP-SR Project.

This PCDP has been prepared to support the development of the ESIA for WREP-SR project. It will be revised from time to time to reflect changes in the project and to incorporate lessons learnt and experience gained through ESIA work and consultation with stakeholders.

The construction contractors implementing the WREP-SR Project will be required to continue consultation with stakeholders, in conjunction with BP. Along with BP, they will play a large part in implementing the mitigation measures identified in the ESIA.

The WREP-SR Project's stakeholders include the ministries and agencies of the Government of Georgia (especially regulatory authorities), non-governmental organisations (NGOs) and Project-affected communities (PACs) and are listed by category in Section 6.

This PCDP describes a plan for stakeholder consultation which aims to achieve the objectives described in Section 4.

## 2 PREVIOUS AND ONGOING STAKEHOLDER ENGAGEMENT

### 2.1 Other Projects

BP has been operating in Georgia since the mid 1990s and has undertaken extensive stakeholder consultation associated with its major developments. Specifically ESIA-related stakeholder consultations have been implemented for development of the WREP, BTC, SCP and SCPX pipelines (and associated facilities), the Supsa Terminal, and other developments such as the non-hazardous waste landfill near Rustavi. Therefore, BP already has well-established relationships with key stakeholders.

During ESIA implementation for the BTC, SCP and SCPX Projects, extensive stakeholder consultation programmes were undertaken, involving *inter alia* national and local government entities, NGOs and communities along the pipeline routes in Georgia.

Ongoing stakeholder consultation activity associated with the operation of the WREP, BTC, SCP and SCPX pipelines includes:

- Regular communication with local community members and local government representatives including update meetings on topics such as pipeline operation; community safety and land use restrictions
- Implementation of the grievance procedure to record and respond to community complaints
- Regular dialogue with National NGOs through capacity building initiatives
- Regular communication with media including round table meetings and field trips.

The WREP-SR stakeholder consultation programme has built upon the lessons learnt from the BTC/SCP/SCPX projects and the existing established relationships between BP and key stakeholders.

### 2.2 Consultation on WREP-SR

ESIA work for the WREP-SR Project began in 2009. Since then there has been continuous monitoring of the pipeline, landslides and rivers and some minor works have been undertaken as part of WREP. The technical scope of the WREP-SR Project has evolved over this period to take account of the information obtained from the monitoring programmes.

The SCPX ESIA stakeholder consultation programme during 2009 - 2012 included initial WREP-SR consultation and involved *inter alia* national and local government entities, NGOs and communities along the pipeline routes in Georgia.

Subsequently ESIA consultation for WREP-SR was undertaken during early 2016, to inform the scope of the WREP-SR ESIA. Further consultation was undertaken during June 2016 as part of draft ESIA Report disclosure process, to inform preparation of the final ESIA Report.

## 3 PROJECT DESCRIPTION

### 3.1 The WREP-SR Project

BP operates the Western Route Export Pipeline (WREP) in Georgia, on behalf of the Georgian Pipeline Company (GPC), and is planning to re-route and replace certain sections to continue the safe and efficient transport of oil from Azerbaijan to Supsa terminal on the Black Sea.

The proposed works in Georgia are to:

- Re-route three pipeline sections that are close to unstable slopes
- Replace two crossings of the river Supsa to reduce the risk of the pipeline being exposed due to erosion of the river bed.

The main work is currently scheduled to begin in late 2016, with scheduled completion by 2019. The current design capacity of the pipeline will not be changed by the works and will remain at its current value of 140,000 barrels/day.

The new sections range in length from 500 metres to 7.8km and have a total length of approximately 13.6km. They will be located as close as possible to the existing pipeline, apart from where they are re-routed around landslides. The locations of the existing WREP and proposed new sections are shown in Figure 1.



Figure 1: Location of Works Associated with WREP-SR Project

### 3.2 Environmental and Social Impact Assessment (ESIA)

The WREP-SR ESIA determines the potential project impacts on the natural environment and on nearby people and communities. The ESIA findings will inform project design and decision-making (by BP and the regulatory agencies of the Government of Georgia), by

identifying key environmental and socio-economic issues and sensitivities associated with the Project, and by enabling the establishment of effective processes for impact mitigation, management and ongoing monitoring.

The WREP ESIA process included the following:

**Project screening** (in line with BP requirements): The purpose of screening is to ensure early identification of key environmental and social sensitivities and potential project impacts on those sensitivities. It results in a list of prioritised potential impacts for management through the lifecycle of the Project.

**Project scoping** to identify key environmental and social sensitivities associated with the WREP-SR Project, and therefore the key issues to address in the ESIA Report. Existing sources of data were reviewed to identify gaps and the requirements for additional studies. Key governmental stakeholders were consulted during this phase through individual meetings.

**Baseline socio-economic and environmental investigations:** in line with scoping results, provision of a detailed description of baseline socio-economic and environmental conditions in the WREP-SR area of impact has been acquired, including information on critical trends in the biophysical and social environments. The baseline conditions will also provide a basis on which to monitor environmental and social change during the life of the Project. Existing baseline data for the WREP-SR route has been updated with field surveys designed to address specific data gaps.

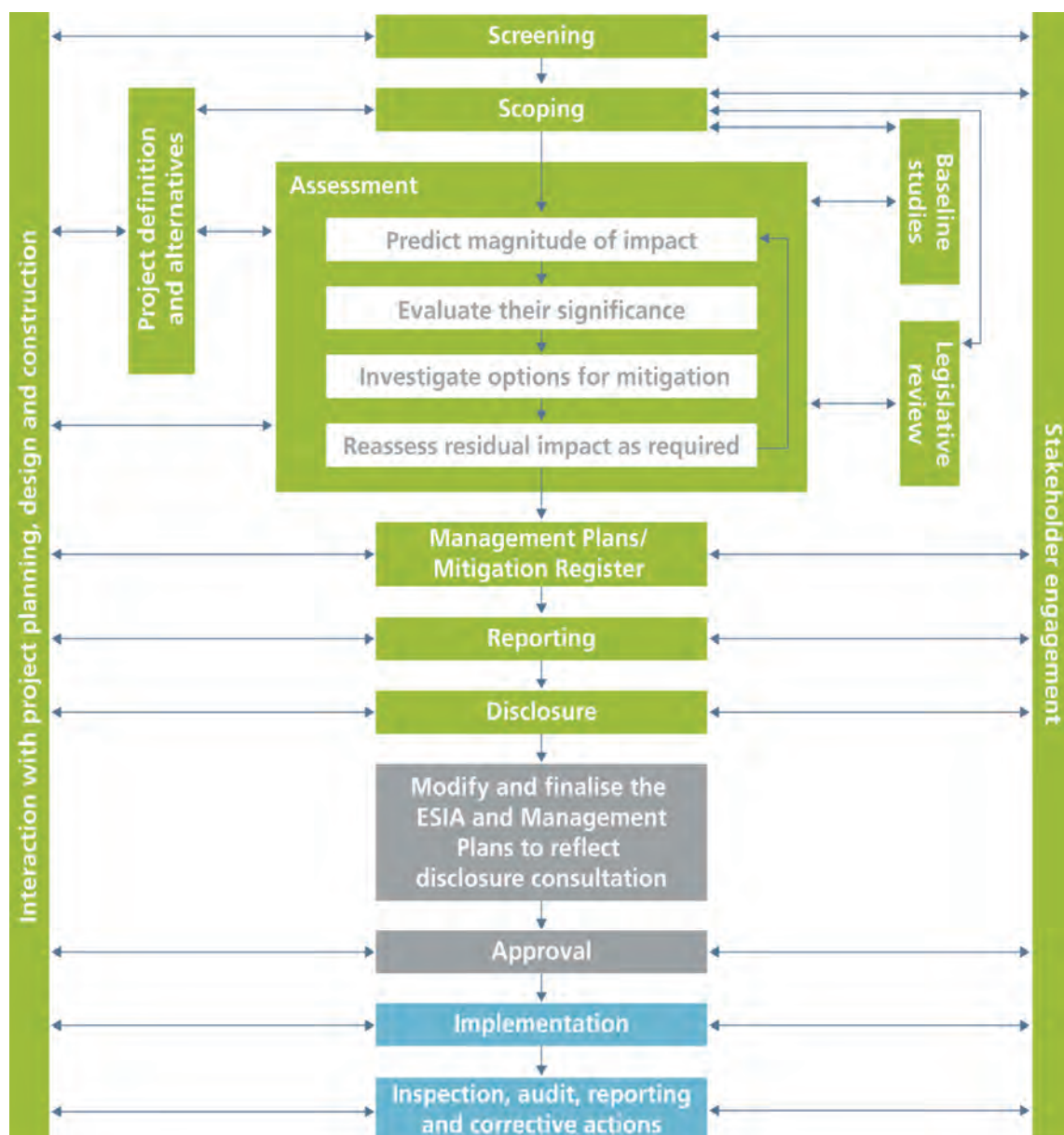
**Impact assessment:** to provide a comprehensive assessment of the potential impacts of the WREP-SR Project. This included an evaluation of the nature, magnitude and significance of all environmental and socio-economic impacts. The most significant impacts identified during the assessment process – including those related to particularly sensitive environments or vulnerable social groups – have been addressed in greater detail. Impact assessment work also addresses cumulative and trans-boundary impacts.

**Draft ESIA report:** The draft ESIA report was submitted to the Georgian Oil and Gas Corporation (GOGC) who distributed it to other government ministries for comment including the Ministry of Environment and Natural Resources Protection (MENRP). Copies of the draft ESIA Report were also provided directly to identified key stakeholders whilst the draft ESIA Report and an accompanying Non-Technical Summary and Technical Summary were made available at public locations, such as the offices of regional, municipality and village leaders in the project affected communities. Public meetings were also held at key locations during the ESIA disclosure phase to inform stakeholders and seek feedback on the draft ESIA findings.

**Final ESIA report:** Following consultation on the draft ESIA report, this final version of the ESIA report was developed and incorporates, where appropriate, comments and issues raised on the draft ESIA Report, by the MENRP and other stakeholders. This includes a record of all comments received during disclosure and the responses, which relate to the WREP-SR ESIA and the draft ESIA Report (see Appendix C2).

**Approval:** Based on the ESIA findings, and agreement on the implementation of appropriate measures for impact management, the Georgian government authorities (MENRP and GOGC as per the HGA) will determine whether the required approvals and permits will be issued.

Stakeholder consultation will be an integral component of the ESIA process, as shown in Figure 2.



**Figure 2: The ESIA Process**

## 4 CONSULTATION AND DISCLOSURE OBJECTIVES

The WREP-SR PCDP has the following strategic and operational objectives:

- Identification of all Project stakeholders and to understand the nature of their interest and influence in project development and impact management
- Provision of culturally appropriate, adequate and timely information on project development and impact assessment to Project stakeholders
- Providing culturally appropriate and timely opportunities for Project stakeholders to express their opinions and concerns in relation to the ESIA and project development and for these to be reflected in the ESIA and management decisions where considered appropriate
- Providing the WREP-SR Project team with comments and feedback from national and international stakeholders
- Establishing a foundation of effective and broad stakeholder engagement that is conducive to the emergence of stakeholder support for the Project and impact management programs
- Supporting compliance with WREP HGA and PCOA requirements
- Ensuring that project decisions consider, to the extent feasible, stakeholder needs, priorities and concerns
- Reducing the potential for delays in decision-making times for issue of project approvals and permits or the need for costly redesign of operations/facilities. The consultation process will help to ensure continuity in project development and the implementation of agreed impact management strategies
- Helping stakeholders understand the Project's corporate and operational aims and requirements and have confidence in the Project's ability to manage risk in a responsible manner.

It is however important to note that the stakeholder engagement will continue beyond any potential approval of the Final ESIA Report.

The selected construction contractors will be required to implement stakeholder engagement for the duration of their activities on behalf of the Project, often in conjunction with BP, as part of their ESMS. In this respect local communities and other Project stakeholders will be made aware of the WREP-SR grievance mechanism.

## 5 REGULATORY AND POLICY CONTEXT

Stakeholder consultation activities presented in this PCDP, and undertaken to support the development of the WREP–SR Project in Georgia, will conform to:

- The requirements of the WREP Host Government Agreement (HGA) in particular, Appendix 1 entitled, “Pipeline Construction and Operating Agreement” (PCOA) which requires the Project to be undertaken in accordance with Georgian legislation (in this instance as it pertains to the conduct of Environmental Impact Assessments) and good international oil industry standards and practices
- The EC Directive 2011/92/EU on Assessing the Effects of Certain Public and Private Projects on the Environment.

In order to help define good international oil industry standards and practice, the WREP SR has considered key principles of the IFC’s Performance Standard 1 on *Assessment and Management of Environmental and Social Risks and Impacts* (International Finance Corporation, 2012)<sup>1</sup>, regarding ESIA consultations.

The legal regulatory context and applicable standards are described in detail in Chapter 6 of the ESIA. The Project has determined that the legal, policy and administrative framework outlined above, supports the principles and objectives of stakeholder consultation outlined in the Introduction to this PCDP (Section 1): that stakeholders should be consulted in a meaningful and transparent way, in order for them to contribute to the process of designing and executing the Project, particularly within an ESIA context. In this way, adverse impacts on people and the environment can be minimised, and the potential benefits maximised.

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<sup>1</sup> In addition, cognisance was taken of the recommendations contained in IFC (2006) *Lessons of Experience: The Baku-Tbilisi-Ceyhan (BTC) Pipeline Project*, Number 2. Washington, DC: IFC. Also, although an ‘archived’ document, account was taken of IFC’s ‘*Guidance for Preparation of a Public Consultation and Disclosure Plan*’, Environmental and Social Review Procedure Guidance Note F.

## 6 STAKEHOLDERS

The following definition of a stakeholder as being *any organization, group or individual which is in any way affected by the proposal or has the ability to influence the Project* will be adopted for the WREP-SR ESIA process. In line with this definition, government ministries and agencies, local government entities, NGOs, Project-affected communities (including community-based interest groups (such as those based on livelihoods) and individual residents, are all recognised as stakeholders.

It is recognized that the nature and intensity of participation in the ESIA consultation process may vary between stakeholders and between different stages of the process. During the ESIA consultation process the WREP-SR team aimed to ensure that the consultation process was appropriate to the information and participation needs of the diverse range of WREP stakeholders.

From the outset of the ESIA process BP identified the key stakeholder groups to be consulted at various stages of the Project:

- National, regional and local government authorities
- Project-affected communities (essentially, settlements located wholly or partly within defined distances from WREP-SR Project components, such as pipeline re-route sections and access roads)
- International and national NGOs
- Scientific Community
- BP Staff
- WREP-SR Project partners.

### 6.1 National and Local Government Authorities

The box below shows the key central government stakeholders sub-divided into those with a formal role in the approval process and those with a recognised interest in WREP-SR Project.

<p><b>1. Central Government stakeholders with a formal role in the ESIA approval process:</b></p> <ul style="list-style-type: none"><li>- <i>Ministry of Environment and Natural Resources Protection (MENRP), the key governmental environmental institution within Georgia. Within MENRP there are two key departments: Environment Agency and the Reserved Area Department</i></li><li>- <i>The Georgian Oil and Gas Corporation (GOGC) - Government representative for Caspian oil/gas transportation projects in Georgia</i></li></ul> <p><b>2. Central Government stakeholders with a recognised interest in the WREP-SR Project:</b></p> <ul style="list-style-type: none"><li>- <i>Ministry of Economy and Sustainable Development</i></li><li>- <i>Ministry of Energy which includes the Natural Resources Agency (which includes the Forest Department), Environmental Monitoring Inspection, Environmental Investigation Department</i></li><li>- <i>Ministry of Agriculture (irrigation department)</i></li></ul>
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- *Ministry of Culture and Monument Protection (which includes the National Agency for Cultural Heritage Protection)*
- *National Commission on Communications*
- *Ministry of Internal Affairs*
- *Ministry of Regional Development and Infrastructure (Roads; River Protection Departments)*
- *Ministry of Justice, including the National Agency of Public Register*

Local government stakeholders are the appointed officials and elected representatives in those regions (*mkhare*) and municipalities (*municipalitetebi*), in whose territories WREP-SR Project activities will take place. The current regional and local government structure is illustrated in Table 1 and Appendix A.

**Table 1: Local Government Structure**

Government Entity	Elected Representatives	Appointed Representatives
State	President Parliament	Prime Minister, Ministers
Regions		Regional Governor
Self-Governing Cities	City Council - <i>Sakrebulo</i>	Mayor
Municipalities	Legislative Council – <i>Sakrebulo</i>  Head – <i>Sakrebulo</i> Chairperson	Executive Council – <i>Gamgeoba</i> : members appointed by <i>Gamgebeli</i> Head – <i>Gamgebeli</i> : appointed by <i>Sakrebulo</i> Chairperson, in agreement with <i>Sakrebulo</i>
Towns <sup>1</sup>	Elected representative to municipality <i>Sakrebulo</i>	Municipality <i>Gamgebeli</i> Representative
Territorial Organ <sup>2</sup>	Elected representative to municipality <i>Sakrebulo</i>	Municipality <i>Gamgebeli</i> Representative

<sup>1</sup> Towns that are not self-governing entities are constituent part of municipalities and are considered equivalent to territorial organs.

<sup>2</sup> Territorial Organs can consist of one village, but usually consist of several villages

On this basis, the following local government entities were identified as local government stakeholders for this Project:

- Regions of Imereti and Guria
- City of Tbilisi
- Territorial organs of Tbilisi, Korbouli, Mandaeti, Sveri, Nigozeti, Supsa and RmaRele

## 6.2 Project-affected Communities

Fifteen towns and villages have been identified as project-affected communities (PACs) for the current scope of work. A PAC is defined (based on an update of criteria used for the BTC/SCP/SCPX ESIs) as an inhabited settlement that falls within the following boundaries or has at least one inhabited structure that is on/within the boundary:

- Pipeline: 2km either side of the centre-line resulting in a 4km wide zone

- Access roads (new or upgraded; temporary or permanent): 300m either side of the centre-line resulting in a 600m wide zone.

Two approaches to identifying PACs were used. Firstly application of the boundary criteria listed above. Secondly, consideration of settlements outside the above boundaries, but located nearby. Each such settlement was subject to a case-by-case analysis of its characteristics and a judgment was made by the ESIA team that, on basis of previous experience and available data, there is reasonable likelihood that the community might be affected.

This work was conducted by the ESIA team with input from BP social and land specialists and the outcome of each case-by-case analysis resulted in a decision as to whether a settlement outside of a defined boundary was identified as a PAC.

A list of the current WREP-SR PACs is provided in Table 2. This list will be revised and updated once final details of locations of WREP-SR activities are confirmed.

Consultation with PACs was a central feature of the ESIA consultation process, and engagement with PACs will continue, post-ESIA, during construction and operation of the upgraded WREP.

**Table 2: Project Affected Communities**

Region/city	District/city	Territorial Organ	Project Affected Community	Section
Tbilisi	Tbilisi	Gldani	Village Gldani Gldanula Avchala 2	RR-001 and ARs
Mtskheta-Mtianeti	Mtskheta	Tshvaritchamia	Mamkoda	ARs in RP-001a and RR-001
Imereti	Sachkhere	Korbouli	Shomakheti	AR to PRS1
	Sachkhere	Korbouli	Korbouli	AR to PRS1
	Chiatura	Mandaeti	Tkemlovana	RR-004a
	Chiatura	Mandaeti	Mandaeti	AR223
	Chiatura	Sveri	Sveri	RR-004a
	Chiatura	Nigozeti	Tskalshavi	AR to PRS1
	Chiatura	Nigozeti	Usakhelo	AR to PRS1
	Chiatura	Nigozeti	Zeda Beretisa	AR to PRS1
Guria	Lanchkhuti	Supsa	Khidmaghla	Supsa crossing
	Lanchkhuti	RrmaRele	Tskaltsminda	Supsa crossing
	Lanchkhuti	Supsa	Grigoleti	Supsa crossing

## 6.3 International and National NGOs

NGOs that have previously participated in audit and monitoring programmes and shown an active interest in BP's activities in Georgia, along with the wider NGO community in Georgia are considered to be key stakeholders for the Project. BP Georgia retains a database on NGOs, and their area(s) of interest, for NGOs which have been involved previously or are currently involved or interested in BP's activities. An international NGO with particular relevance to the WREP-SR Project is UNESCO, which is responsible, among other things, for the designation of World Heritage Sites. Consultation has been undertaken with

UNESCO regarding works in proximity to Jvari monastery, part of the Mtskheta World Heritage Site.

The NGO community in Georgia also has a number of information-sharing networks/partner organisations including:

- Caucasus Environmental NGO Network (<http://www.cenn.org/wssl/index.php>)
- Regional Environment Centre for the Caucasus (<http://www.rec-caucasus.org/index.php?lang=en>)
- Eurasia Partnership Foundation (<http://www.epfound.ge/english/about-us.html>)

Existing internal NGO databases and/or NGO networks and partnerships will be used as required to engage this stakeholder group in consultation on the WREP-SR Project.

## **6.4 Scientific Community**

It was recognised that the scientific community should be engaged in the WREP-SR Project as members of this community can provide advice and consultancy assistance to the government regulators in the ESIA Report review process and in 'approval' decision-making and can contribute to the ESIA process in general.

Many of the scientific community in Georgia are also considered to belong to the NGO community due to the NGO involvement in scientific research projects. The scientific community will be engaged through information sharing via the NGO community and through GOGC (the formal ESIA approver).

## **6.5 Media**

BP has existing relations with media organisations which participate in the regular briefings and updates that BP provides on its activities in Georgia. Information on the Project will be provided through these existing channels. Additional media organisations will be engaged through information sharing on NGO networks (which are subscribed to by various media organisations).

## **6.6 BP Staff**

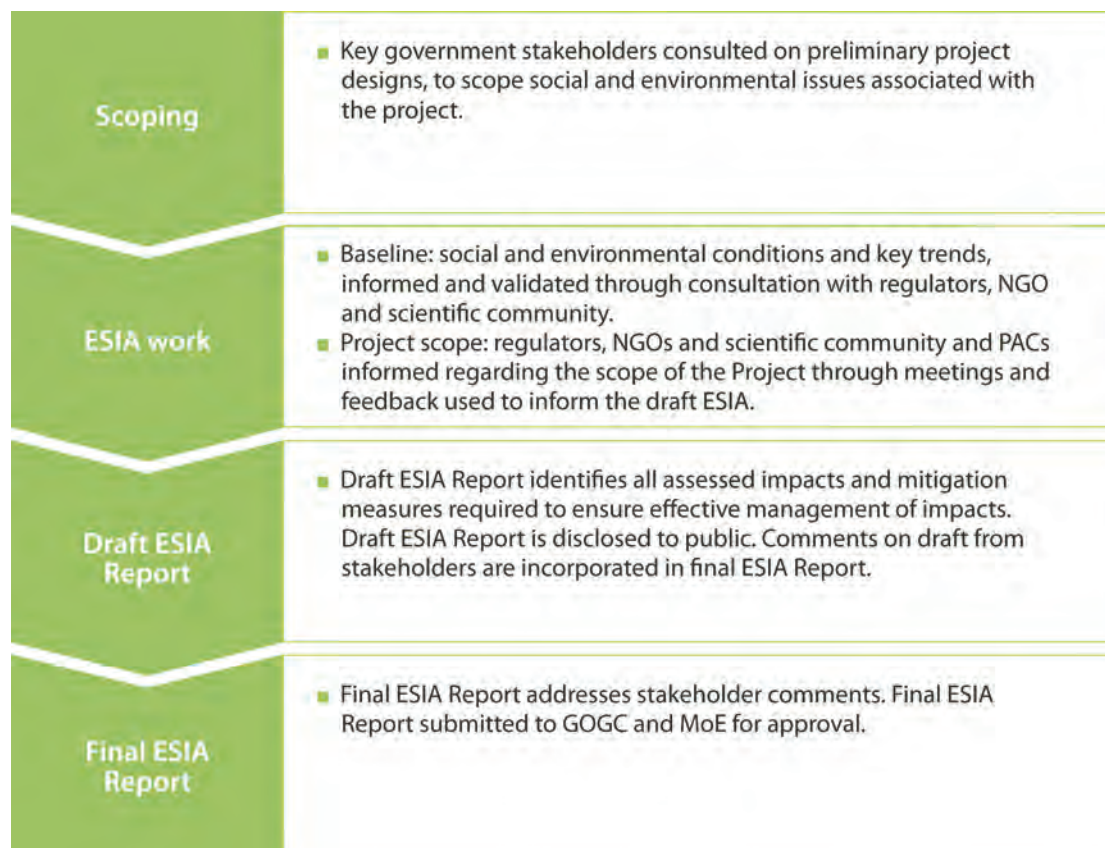
BP staff members are stakeholders in the WREP-SR Project and will be kept informed of project progress at regular intervals.

## **6.7 WREP-SR Project Partners**

WREP-SR Project partners are also stakeholders in the WREP-SR Project and will be kept informed of Project progress at regular intervals, generally through quarterly partner meetings.

## 7 METHODOLOGY

This section describes the methodology for the consultation activities planned for WREP-SR with various stakeholder groups and explains their relationship to the ESIA process. The stages of consultation are illustrated Figure 3 below.



**Figure 3: Stages of ESIA Consultation**

### 7.1 Consultation Methods

The ESIA stakeholder engagement process will use a wide range of communication and consultation methods appropriate to different stakeholder requirements. Approaches and timings are illustrated in Table 3, below.

**Table 3: Consultation Approach and Timing**

Stakeholder	Type of consultation
National government	Two face-to-face meetings with MENRP at different ESIA stages One face-to-face meeting with GOGC One face-to-face meeting with NACHP Plus <i>ad hoc</i> regular face-to-face progress meetings on specific Project level issues as necessary
Local government (e.g. Regional, Municipality Officials and PAC 'leaders')	Face-to-face consultation meetings at all local government levels, including PACs (see below)

Stakeholder	Type of consultation
PACs	Consultation meetings with key community representatives <sup>2</sup> from all PACs (approximately 5 in each community including the Municipality Gamgebeli Representative of the Territorial Organ in which each PAC is located) Further meetings in each Region/Municipality during disclosure.
NGOs	One consultation workshop for NGOs will be held in Tbilisi after disclosure
Scientific Community	Scientific community members will be engaged through invitations to the NGO workshop
Media	National and regional media will be consulted during the draft ESIA Report disclosure process and will be invited to public meetings
BP Staff	Will be informed and engaged to promote clarity and prevent unrealistic expectations. Special focus will be given to staff working on the Project including Community Liaison Officers
WREP-SR Project partners	WREP-SR partners will be updated at regular quarterly meetings

In addition, summaries of the WREP-SR Project and various ESIA-related documents will be posted on BP's internet site and can be viewed by any interested individual/organization globally.

## 7.2 Briefing Materials and Messaging

PACs and other stakeholders need to receive clear, consistent information about the WREP-SR Project and the ESIA process. The WREP-SR Project team has developed information about the Project and ESIA process for use with various audiences. It includes:

- An illustrated community leaflet providing an overview of the Project, for use in consultation with PACs and other stakeholders (a copy of the leaflet is provided in Appendix B)
- A question and answer (Q&A) sheet for use by Project and ESIA personnel in response to questions commonly raised by stakeholders (particularly those living in PACs) during ESIA consultations and ESIA implementation (including baseline surveys).

The illustrated leaflet was prepared in Georgian and 1500 copies were distributed in the PACs prior to consultations occurring. This number was calculated so that there were sufficient copies to ensure that there would be at least one leaflet per 10 people.

## 7.3 Draft ESIA Report: Disclosure

The Draft ESIA Report (and accompanying documents) were made available at certain key public locations in order to allow stakeholders to review it and provide feedback. Such locations included regional, municipal and local government offices and Tbilisi National Library.

In addition, and particularly to assist PAC residents, the ESIA Non-Technical Summary (NTS) was available at the Municipality Gamgebeli Representative's office (or an alternative

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<sup>2</sup> PAC representatives were selected by PAC leaders using criteria developed for the WREP-SR Project in order to achieve a balanced consultation involving a range of perspectives. Recommended representatives included *inter alia* a medical professional, a farm worker or owner, and a young person; of these at least one should be a woman.

suitable location) within each Territorial Organ. A community leaflet was distributed to these offices within Project-affected communities, together with feedback forms to allow comments on the ESIA Report/Non-Technical Summary to be received and considered during the disclosure period.

The WREP-SR Team worked with BP's Communications Department to use mass media and Project communications channels to publish, and invite comment on, the draft ESIA Report.

Information on the ESIA process, the draft ESIA Report (and associated documents), and the consultation process was published through the following media outlets and other mechanisms:

- Regional and national newspapers
- Project email databases
- BP internet site
- Presentations by WREP-SR Project and BP Georgia staff, ESIA team personnel on technical studies and analyses conducted through the ESIA
- Public information displays in Community public buildings such as schools or government offices close to the main centres of Project activities. Exact locations will be defined during the ESIA implementation phase
- Leaflets, brochures, posters and audio-visual materials.

The WREP-SR ESIA Team ensured that:

- The material was published in the Georgian and English language and was non-technical in nature
- The material published was comprehensive and provides a fair reflection of the positive and negative impacts of the WREP-SR proposals
- All stakeholders were informed of the publications/information; had access to the material; and had adequate time in which to reflect on the proposals and formulate their response
- Prior to changes in the draft ESIA Report being finalised and the release of responses to stakeholders, internal approval of any commitments therein was confirmed by WREP-SR managers.

Relevant stakeholders were informed about the publication of the ESIA, had access to the material and were allowed adequate time in which to reflect on the proposals and formulate any response.

## **7.4 Public Meetings**

In compliance with Georgian legal requirements, public meetings were held in order to present the findings of the ESIA (draft ESIA Report disclosure) and seek feedback from stakeholders. Public meetings were held in Tbilisi and at other key locations near the main areas of Project activity (Sachkhere, Chiatura, Lanchkhuti, Mtskheta and Gardabani).

A summary and schedule of current and proposed consultations for the WREP-SR ESIA is shown below in Table 4.

**Table 4: Consultation Schedule**

Stakeholder group	ESIA consultation Q1 2016	ESIA disclosure Q2 2016
National, and Local Government	Meeting with key ministries including MENRP and NACHP (others informed by letters)  Regional and Municipality Government meetings	Environment and Social (E&S) Baseline Report submission and approval via GOGC  Announced draft ESIA Report/Non-Technical Summary in national and local press  Submitted draft ESIA (within 7 days of media announcement) to GOGC, MENRP and MoESD (electronic and printed versions)  MENRP invited to main public meetings  Regional and Municipality Governments informed of public meetings  Draft ESIA Report and Summary lodged at public locations near major WREP-SR locations  Public meetings held nationally and regionally
PACs	7 meetings encompassing all 15 PACs (most PACs participate in clustered consultation meetings involving between 1 and 4 PACs )	PAC Municipality Gamgebeli Representatives invited to public meetings. PAC residents give opportunity to attend
NGOs and scientific community		One public meeting in Tbilisi for all interested parties (including media and government)  Invitation to regional public meetings
Media		Inform media via quarterly report when ESIA submitted to GOGC/MENRP for review  Invited to public meetings

## 8 DATA MANAGEMENT

The WREP-ESIA team has established a stakeholder database that includes details of key stakeholders; their participation in ESIA consultations processes and issues raised. The database allows information to be assembled, collated and analysed.

For each stakeholder, the database includes the following data:

- Name
- Contact details
- Stakeholder group (e.g. government, NGO, PAC etc.)
- Primary point of contact if the stakeholder is a group or organization
- Nature of the WREP-SR Team's current and previous involvement with the stakeholder
- History of communications/interaction with the stakeholder
- Primary interests in the WREP-SR Project and ESIA process
- Level of influence over the ESIA process and project development
- Level of contact with the stakeholder (e.g. written communications, face-to-face etc.)
- WREP-SR Team representative/s who primarily interact with the stakeholder
- Reference to any investigations, activities or reports particularly relevant to the stakeholder's primary areas of interest.

The stakeholder database is a dynamic tool. It will be revised and updated throughout the ESIA process.

## 9 GRIEVANCE MECHANISM

BP has an established mechanism to handle grievances and complaints, which has been developed and used with success over more than a decade for previous projects. The WREP-SR Project will develop a similar Grievance Mechanism for all aspects of the Project, starting with pre-construction surveys and land acquisition and throughout Project construction [Note comments on the ESIA have been recorded in the stakeholder database]. The Grievance Mechanism enables local people and other stakeholders to bring complaints to BP in order for them to be considered, for corrective actions to be taken if appropriate, decisions on the grievance/complaint to be made and for the complainant informed about the outcome. The key elements of the Grievance Mechanism are summarised below.

The WREP-SR Project Team will be responsible for collating and maintaining a record of written and verbal complaints associated with the WREP-SR ESIA process or project implementation. Any complaints received by members of the WREP-SR Project team or its contractors will be acknowledged by a nominated member of the team, within two weeks of receipt. All complaints should be responded to in writing, though a verbal response may also be provided, if this is more appropriate under the circumstances (e.g. where literacy may be an issue).

The WREP-SR Project team will be responsible for producing a monthly report detailing the number and status of complaints, and any issues to be addressed. The number and types of complaints, and how they are handled, will be monitored by BP during the WREP-SR ESIA process.

The Complaints Log will assign a number to each complaint, to facilitate tracking and recording of actions. It will also contain a record of who is responsible for an individual complaint, as well as key dates and other information about the complaint. The Complaints Action Form (see example below in Figure 4) specifies the information required to ensure the complaint is processed to closure.

<b>LOGO</b>	
<b>THIRD PARTY COMPLAINT FORM</b>	
<b>PART A: COMPLAINANT DETAILS</b>	
Complaint number:	
Date received:	
Location:	(e.g. village name, KP point)
District:	
Complainant name:	
Land parcel number:	(if available)
Telephone number and/or address:	
Method of complaint:	(verbal/written/public meeting)
Name of CLO/land officer taking complaint:	
Daily report reference number:	(if relevant)
Written complaint ref number:	(e.g. incoming DCC number, or third party reference number)
<b>PART B: DETAILS OF COMPLAINT</b> Date of incident: Description of complaint: Has something been damaged? What? When? How? Where? Quantities? Traffic issues – time the incident occurred? Licence plate number? Type of vehicle(s) involved Land issues – crop damage? Re-instatement issue? Additional land? What type of crop? Does the complainant have any supporting documentation? If so, obtain copies as relevant.	
<b>PART C: DETAILS OF RESOLUTION</b> Provide details of assessment that takes place: (who assessed, what did they find)  Provide summary of how complaint resolved: Rejected/Compensated/Other corrective actions taken (please describe)  Date letter delivered to complainant: Reference number of outgoing correspondence: Did the complainant accept the resolution? Additional comments:	

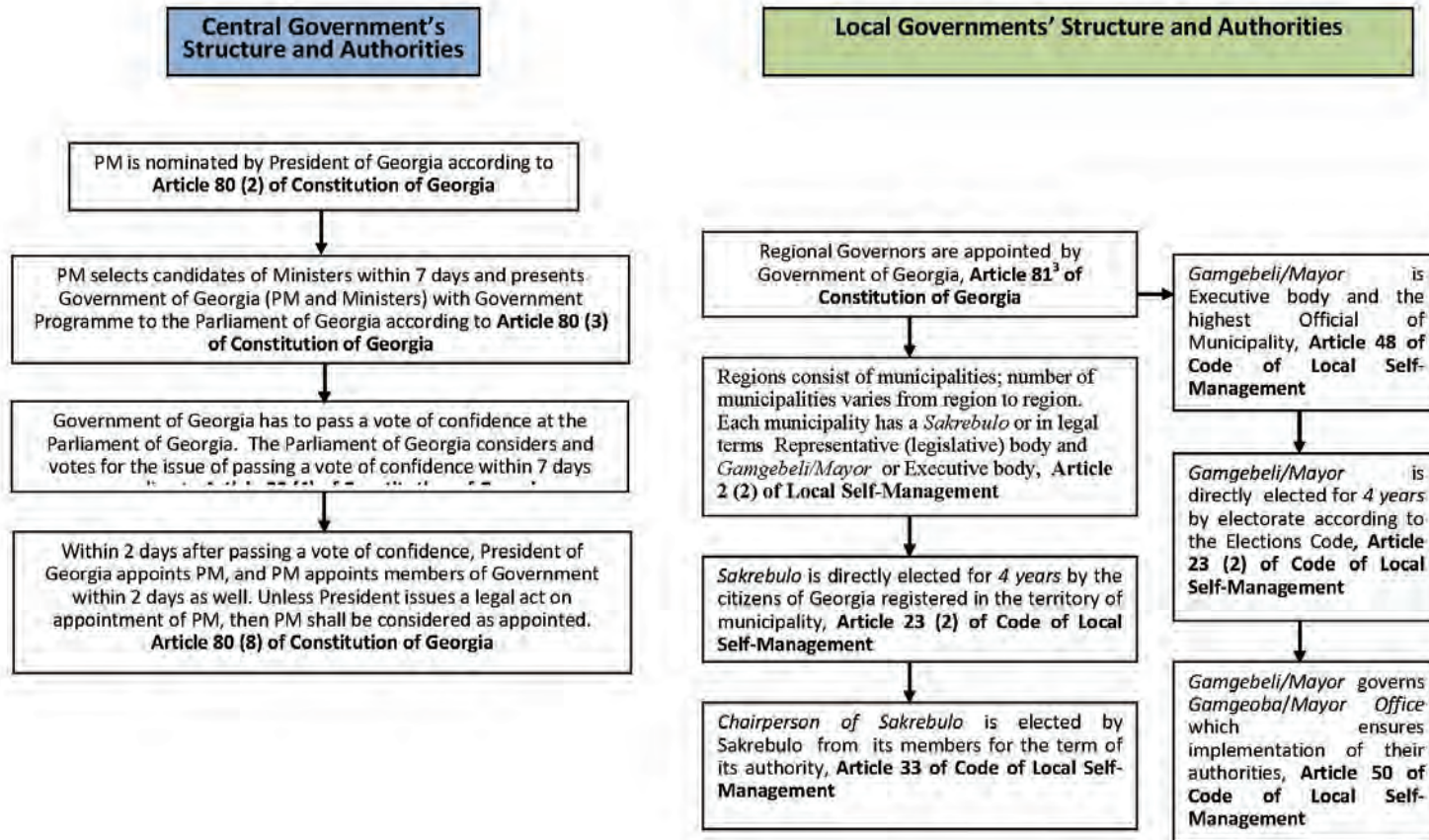
**Figure 4: Complaint Action Form**

## 10 REPORTING

Within the ESIA the WREP-SR Project will report on the progress of the stakeholder consultations. At the conclusion of the ESIA process, the WREP-SR ESIA team will issue a close out report on the consultation process. The report will review the consultations and communications activities conducted; levels of stakeholder participation, particularly among vulnerable or marginalized groups; the issues discussed and outcomes; and the extent to which stakeholder issues, priorities and concerns are reflected in the ESIA Report, particularly in the mitigation and monitoring strategies contained in environmental and social management plans. Lessons learned will also be incorporated where applicable.

This consultation report will form an Annex to the WREP-SR ESIA Report.

## **Appendix A - Government Hierarchy**



## **Appendix B - Community Pamphlet**

### About the Environmental and Social Impact Assessment (ESIA) study

The ESIA study will be undertaken in line with the requirements of the Host Government Agreement, which states that it must comply with the practices applied in Europe. Consultation will be undertaken with local people, local authorities and community groups to ensure to the greatest possible extent that any potential impacts are kept to a minimum and that benefits are realised. The ESIA will also be used by the Government of Georgia to make decisions about issuing construction permits for the project.

### About the disclosure of information and consultation

The ESIA study will involve a programme of initial consultations with community leaders and other stakeholders in towns and villages near the proposed replacement sections and access roads and will be followed by the ESIA public disclosure process.



### Your input

A series of initial consultation meetings has started. If you have any comments, views and opinions about the proposed project or its potential impacts that you wish to see considered as part of the ESIA, please present them at your local government office (Gamgeoba) verbally or in writing. They will be submitted to the team implementing the ESIA. In this way, you will help us to ensure that all the views of local residents are considered during the design and planning of the project.

Please submit your comments, views and opinions within one week of receiving this leaflet.

### About BP

BP is one of the world's largest energy companies and operates in more than 80 countries. BP first came to Georgia in 1996 and, on behalf of its partners, now operates three major pipelines in the country: WREP, the Baku–Tbilisi–Ceyhan oil pipeline (BTC) and the South Caucasus gas pipeline (SCP). BP is also building the SCP extension (SCPX) pipeline. Safe and reliable operation is the number one priority for BP.

### Contact

BP Exploration (Caspian Sea) Ltd Georgia  
24 Sulkhan Tsintsadze Street  
0160, Tbilisi, Georgia  
Switchboard: 259 3400



## Western Route Export Pipeline Sectional Replacement Project in Georgia



**BP operates the Western Route Export Pipeline (WREP) in Georgia on behalf of the Georgian Pipeline Company (GPC) and is planning to replace and/or re-route certain sections.** The aim is to help ensure the continuation of the safe and efficient transport of oil from Azerbaijan to the Supsa terminal on the Black Sea in Georgia.

The WREP system has been operated by BP since 1998. The proposed WREP Sectional Replacement (WREP-SR) project comprises

- re-routing three sections of pipeline to address slope stability issues
- replacing two river crossings to reduce the risk of the pipeline being exposed by erosion of the river bed and banks.

The proposed new sections have a total combined length of approximately 13.6 km. They will be located close to the existing pipeline but will deviate around constraints such as landslides.

Two of the sections to be replaced are located to the north of Tbilisi, with one of them being partially within Tbilisi National Park. Smaller sections are in West Georgia, near Chiatura, and at the crossings of the River Supsa, near Supsa terminal.

Work on the proposed pipeline sections will require several access roads. The project intends to use existing roads wherever possible. Some of the roads may require upgrading and/or widening.

The sections of pipeline to be replaced will be decommissioned during the WREP-SR project.



Before the new sections are welded in to the existing pipeline they will be emptied of oil and cleaned. The most appropriate option for cleaning and removing these sections from service will be selected in consultation with and the agreement of the Government and in line with the requirements of the Host Government Agreement.

The main work is expected to begin in late 2016 and be completed by 2019.

The proposed new pipeline sections will be built and operated to international oil industry standards. They have been routed to avoid existing settlements and will be buried. The land will be restored to its former use.

There will be a programme of regular monitoring and reporting during construction, which will continue into operations, to confirm that everything is working well.

### Land requirements and compensation arrangements

Special provisions will be made to protect the interests of the owners or users of land that will be affected during construction and operation. Rights to land will be acquired and compensation will be paid in line with the Host Government Agreement (HGA) and Pipeline Construction and Operation Agreement. Land acquisition will take place before construction work begins and will involve consultation with all persons who are affected by land acquisition.

### About this leaflet

This leaflet is part of BP's public consultation and information programme, which is part of an overall environmental and social impact assessment (ESIA) study for the WREP-SR project. Further opportunities to provide comment through consultation will be advertised.