

APPENDIX C2

RESPONSE TO ESIA DISCLOSURE PHASE COMMENTS

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1 INTRODUCTION

The WREP-SR Project Environmental and Social Impact Assessment (ESIA) has been subject to a 45-day public disclosure period as required by Georgian legislation. In response to stakeholder comments received during the disclosure period the Draft for Disclosure ESIA (April 2016) has been updated to form the WREP-SR Project Final ESIA, which will be submitted to the Ministry of Economy and Sustainable Development (MoESD) and Ministry of Environment and Natural Resources Protection (MENRP) for review and subsequent approval.

This appendix provides an overview and high level analysis of the stakeholder comments received and a summary of the responses to comments, including an identification of any changes made to the Draft ESIA to address these comments.

2 PUBLIC DISCLOSURE PROCESS

2.1 Overview

The draft ESIA disclosure phase is described in Chapter 9 (Consultation Process) and Appendix C1 (Public Consultation and Disclosure Plan) and involved:

- Disclosure of the Draft ESIA, Environmental and Social Baseline Report (ESBR) and a non-technical summary (NTS) in Georgian in public locations in Tbilisi and in the vicinity of the planned Project locations
 - Copies of the ESIA, ESBR, technical summary and NTS, including their appendices, were made available for viewing in all affected district/city and territorial organ offices
 - Copies of the NTS were made available in public buildings in all Project Affected Communities (PACs)
- Disclosure of the Draft ESIA, ESBR, technical summary and NTS in English and Georgian on the BP website www.bpgeorgia.ge
- Six public disclosure meetings.

2.2 Mechanisms for Providing Feedback

Feedback on the draft document could be provided to the Project via the following mechanisms (which are further described in Chapter 9 and Appendix C1):

- Written feedback sent to the BP Office in Georgia
- Feedback by telephone or email
- Feedback forms submitted to BP Community Liaison Officers or at public meetings
- Verbal feedback at public disclosure meetings
- Submission of electronic feedback forms, which could be downloaded via the website.

Of the comments received the majority (70%) were raised at public meetings, with the remaining 30% received from the MENRP in writing. No comments were received via telephone, feedback forms, e-mail or the website.

2.3 Incorporation of Feedback

Each comment received was entered into the stakeholder comments database, including information on the stakeholder making the comment and the mechanism by which the comment was received.

Each comment was given a unique identification number and assigned a category from a pre-defined list of issue topics; defined to describe the area of the Project or ESIA to which the comment related.

Comments were sorted by issue and a response was generated to each individual comment. Where a number of similar comments were received, an issue summary has been prepared, which collates these comments and provides a summary response. Where applicable, the response also describes how the comment has been addressed.

3 OVERVIEW OF STAKEHOLDER COMMENTS

A summary of the comments received for the various issue topics is provided below. The list of individual comments and responses, including the relevant chapters and sections of the ESIA that have been updated in response to these comments, are included in Section 4.

3.1 Comments Related to Environmental Issues

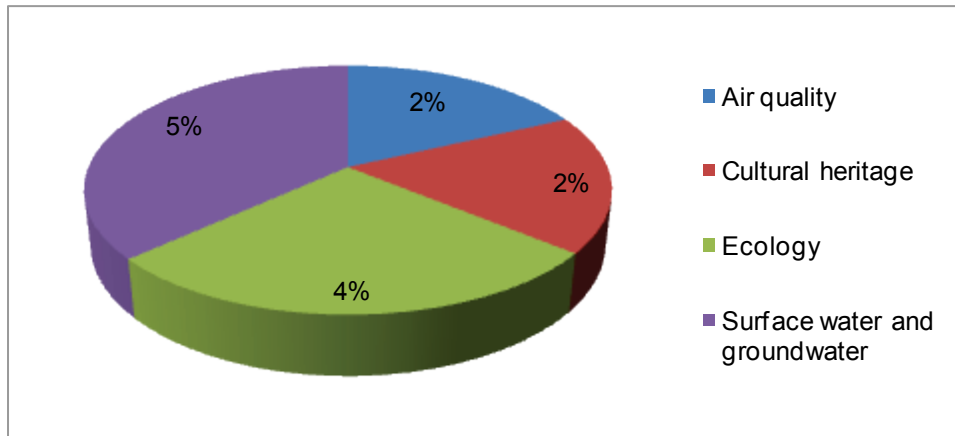


Figure 3-1: Analysis of Stakeholder Comments Related to Environmental Issues

The majority of comments related to environmental issues were raised by the Ministry of Environment and Natural Resources Protection (MENRP).

Comments on water focused on the planned effluent discharges into surface water, water abstraction, and data regarding hydrology and water quality at the planned WREP-SR Project river crossings.

Ecology-related comments were raised regarding the assessment of significance of impacts on the River Supsa ichthyofauna, detailed number of trees (by species) to be removed as a result of the Project, and specific design measures developed to protect the pipeline at erosion-prone locations.

Comments on air quality related to data on national greenhouse gas emissions and estimated Project-related air emissions.

The only environment-related comment from Project-affected communities (PACs), as well as one comment from the MENRP, sought clarification on whether the Project would result in impacts on the cultural heritage of Mtskheta.

3.2 Comments Related to Socio-Economic Issues

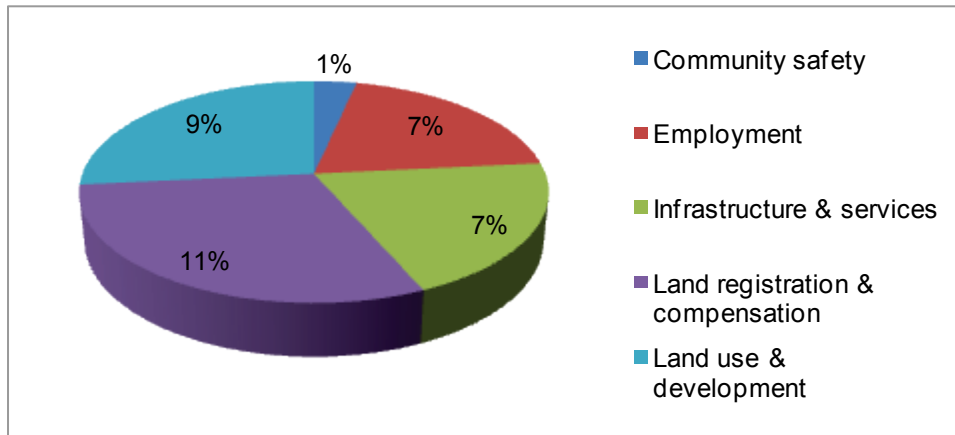


Figure 3-2: Analysis of Stakeholder Comments Related to Socio-Economic Issues

Most of socio-economic issues raised were from members of PACs. The majority of comments related to land issues and included land registration, calculation of compensation, land use and development restrictions.

With regards to infrastructure, PACs concerns focused on impacts on roads, their maintenance and repair. Comment from MENRP required more detailed information on pipeline crossings of third party services.

One comment from a PAC related to community safety, specifically how the new pipeline will be marked so that it is not damaged unintentionally.

3.3 Other Comments

Comments relating to other areas of the ESIA or to the wider approvals process were also raised.

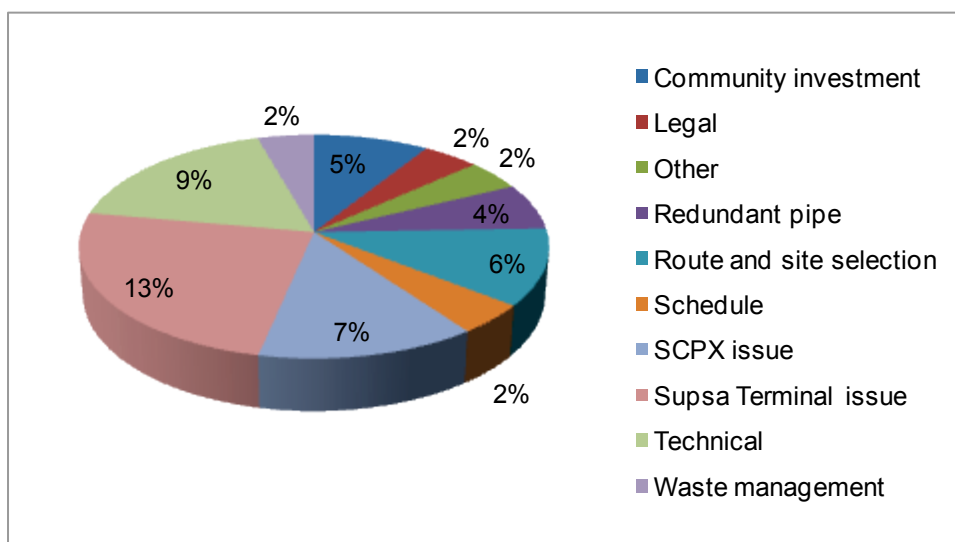


Figure 3-3: Analysis of Stakeholder Comments Related to Other Issues

Most of the comments related to various aspects of the Project description, such as route and site selection, de-oiling process and management of redundant sections of pipeline, proposed construction schedule, pipeline crossings and separation distance, and waste management.

Representatives of PACs asked about potential for community investment. Comments on the permitting procedure (legal and other requirements) were received from the MENRP. The remaining comments related to issues not directly connected to WREP-SR Project, namely SCPX pipeline construction and operation of Supsa Terminal.

4 DETAILED RESPONSE TO STAKEHOLDER COMMENTS

Section 4.1 shows individual comments received from MENRP.

Section 4.2 is dedicated to comments received from PACs during public disclosure meetings held in June 2016. These meetings were attended by representatives of local government and PAC residents. Comments from PACs generally referred to a number of common themes, which have been grouped together under each issue and a response provided in a common template.

Please note that comments received on draft versions which refer to specific sections or tables may not directly correspond with referencing in the final version. This is because in some instances, comments and responses discuss a specific table in a draft version, which has since been updated in the final report. For accuracy, comments have been kept as received and responses address the specific comment referred to. The ESIA Section Reference column in Table 4-1 is updated to reflect section and table referencing in the final report and should be used for cross-referencing.

4.1 Comments from Ministry of Environment and Natural Resources Protection

Table 4-1: Draft ESIA Comments and Responses – MENRP

Comment	ID	Response	ESIA Section Reference
Please be advised that based on the GIS coordinates submitted by you 6,265 m ² land out of 546,452 m ² is located in the Forest Fund managed by LEPL National Forestry Agency according to the State Forestry Fund Borders approved by the Resolution of the Georgian Government No. 299, dated 04/08/2011 on "Determination of the State Forest Fund Borders". Therefore, implementation of the project activities on this territory requires coordination with the Forest Fund Management Authority.	1	Information noted. Area of Forest Fund land added to ESIA.	7.7.4
Chapter 3, p. 16 – according to the submitted report, surface water will be affected in the course of effluent discharges, crossing construction works and accidents. An ESIA report submitted for ecological expertise should specify issues related to effluent discharges into surface water and include "Project on Limit Allowable Standards for Contaminants Discharged with Effluent into Surface Water" indicating effluent discharge locations.	2	Although sewage discharges were listed in Chapter 3 (Methodology) as a potential source of impact, no such discharges are planned for WREP-SRP. Reference to the discharge of sanitary water in Chapter 3 has therefore been deleted. Added note to Chapter 10 stating no planned continuous discharges except hydrotest water.	3.9.6 10.5.3
Taking into consideration that water abstraction and effluent discharge permits are not issued any longer, the report should describe in detail issues associated with water abstraction required for the implementation of the proposed project indicating water abstraction locations and volumes of abstracted water by months. In addition, an ESIA report submitted for ecological expertise should include a hydrotest plan.	3	Locations and volumes of hydrotest water abstraction will not be known until the EPC contractor is appointed. The Contractor will prepare a hydrotest management plan which will be submitted for approval when available and prior to start of hydrotest activities. A description of the proposed content of the hydrotest management plan has been added to 10.5.4.	10.5.4
Chapter 4 – this chapter describes alternative options of the proposed pipeline re-routes only for RR-001; it should also discuss alternative options for RP-001a, RR-004a and both crossings of r. Supsa including maps / figures / drawings.	4	There were no viable routing alternatives for Sections RP-001a or RR-004a due to their short length and position of landslides. Explanatory text and maps have been added to Chapter 4 together with an explanation of the change to the Supsa export pipeline alignment.	Chapter 4

Comment	ID	Response	ESIA Section Reference
Chapter 4, p. 7 – among re-route options discussed in the report, Option B has been considered a preferred one. This option crosses several third-party services / facilities including water and gas pipelines, which will be mapped prior to commencement of construction. An ESIA report submitted for ecological expertise should detail all facilities to be crossed by the proposed project. In addition, agreements should be reached with / consents should be acquired from owners of such facilities prior to the submission of the documentation for ecological expertise.	5	Section 5.2.4 (Pipeline crossings) has been expanded to include a comprehensive crossings schedule (Table 5-2). Explanation added that 3 rd party consents will be included in the application package for the Construction Permit.	5.2.4
Chapter 4, p. 7 – the report states that options A and B for RR-001 are in fact of the same length. However, the figure / map / drawing (scheme?) given on p. 6 shows that Option A is longer than Option B. Consequently, this issue should be clarified.	6	Text amended to correct error.	Chapter 4
Chapter 4, p. 8-9 – the report states that all pipeline sections to be replaced shall be de-oiled using both sectional and continuous displacement methods. An ESIA report submitted for ecological expertise should discuss in detail pipeline de-oiling operations including assessment of all potential risks.	7	Text added to Section 4.5.1 explaining that sectional de-oiling is preferred and that a fuller description of the process is provided in Section 5.5.	4.5.1 5.5
Chapter 4, p. 13 – the report states that the redundant pipeline sections will be left in situ, sectionalized and filled with air. The report should include information on how the redundant parts will be sectionalized.	8	Discrepancy between English and Georgian addressed. Added cross-reference in 4.5.2 to Section 5.5.5 where sectionalisation is explained. Made it clearer in Section 5.5.5 that sections will be left filled with air except under main roads and rivers.	4.5.2 5.5.5
Chapter 4, p. 13 – according to the report, the existing Liakhvi crossing will be replaced and removed from service; the redundant section will be excavated and disposed safely. The report should include a detailed plan of such works; in addition, potential impacts of planned works on the river should be evaluated and appropriate mitigation measures should be developed.	9	This was an error in the Georgian version. Discrepancy between English and Georgian addressed.	Chapter 4

Comment	ID	Response	ESIA Section Reference
The report should include maps / figures / drawings of all pipeline sections to be replaced similar to those provided for RR-001.	10	Expanded text and maps in Section 4.4 to include explanation of lack of alternatives for RP-001a and RR-004a due to short length and proximity of landslides. Added alternatives drawing for Supsa export crossing and explained why alignment has changed.	4.4
Chapter 5, p. 4 – Table 5-2 provides a schedule for only those crossings, which are over 10m wide. This table should detail crossings with width less than 10m, i.e., all potential crossings including rivers, gorges, irrigation channels and railways. It should also be clarified whether tracks over 10m wide referred to in Table 5-2 are in fact routes for cattle and / or sheep herding / movement.	11	Expanded section 5.2.4 (Pipeline crossings) to include a comprehensive crossings schedule. Added note explaining that routes for cattle/sheep movement are being identified within the process of land rights acquisition; consequent data with consents from respective parties will be a part of the Construction Permit application package.	5.2.4
Chapter 5, p. 6-7 – the report indicates that in some areas the proposed pipeline sections are located close to Georgian Oil and Gas Corporation pipelines and minimum separation distance is 10m. A relevant standard should be indicated based on which the given distance between the pipelines was considered optimal.	12	Added explanation that separation distance is based on Document L51861, Line Rupture and Spacing of Parallel Lines, prepared by Pipeline Research Council International (2002). Reference added to Chapter 15 References.	5.3.6 15
Chapter 5, p. 16-17– the report states that the rivers to be crossed will be studied prior to final approval of the project. Estimated flow rates (200-year return period), water levels and potential river bed scour depths should be determined for all river crossings prior to submission of the document for ecological expertise to ensure appropriate planning of design-construction and environmental measures. The above referenced studies and relevant mitigation measures should be provided in the ESIA report submitted for ecological expertise.	13	Paragraph added to Section 5.4.13 explaining that HDD is below and beyond the active zone of the river Supsa. Explanatory boxes added that summarise the key geotechnical reports used during design of the HDD crossings. Hydrological characteristics of the watercourses crossed by the proposed pipeline sections are provided in Table 7-5	5.4.13
The report should describe specific measures including specific design measures developed to protect the pipeline at erosive sites.	14	Added explanation of acceptability of class 3 in Section 7.3.3 and a footnote in Section 10.3.4. Erosion protection measures are detailed in Section 10.3.4 and Table 10-3.	7.3.3 10.3.4
Chapter 7, p. 29 – water quality is assessed in the report based on the surveys conducted in 2009-2011; this information requires update.	15	Added explanation that pre-construction water quality monitoring began in July 2016; results will be supplied to MENRP as required.	7.5.3

Comment	ID	Response	ESIA Section Reference
Chapter 7, pp 55-57 – the submitted ESIA report provides national GHG emissions for 1980-1997 and 1990-2006 periods; these data should be compatible with official information contained in the third national notification report of Georgia. Institution “UN Climate Change Secretariat” should also be clarified indicating relevant reference.	16	Section 7.8.3 revised using data from the 3 rd National Notification report of Georgia.	7.8.3
Chapter 7, p. 69 – the report states that 1km of the proposed WREP SR RR-001 and 100m of the proposed access roads are located in Mtskheta Landscape Protection Zone. This should be coordinated with relevant agency.	17	Summary of Mtskheta HIA report and consultation with NACHP and UNESCO added to ESIA Section 7.10.8.	7.10.8 10.10
An ESIA report submitted for ecological review should specify number of trees by species to be removed.	18	Text added to Section 7.7.4 summarising details of a meeting with MENRP to agree tree inventory methodology. Actual numbers of trees to be removed cannot be determined until the Construction Contractor has been appointed and the centreline pegged.	7.7.4
Taking into consideration that according to the submitted report implementation of WREP SR will have significant negative impact on r. Supsa ichthyofauna, the ESIA report submitted for ecological expertise should discuss potential impacts by species and provide relevant mitigation measures.	19	Information relating to migratory fish in the r. Supsa has been added to Section 7.7.5 and an assessment of potential impacts on migratory fish to Section 10.7.3.	Chapter 7
An ESIA report submitted for ecological expertise should contain a topsoil reinstatement (verbatim recultivation) plan prepared in compliance with Resolution of the Georgian Government No. 424, dated 31/12/2013 on “Removal, Storage, Use and Recultivation of Topsoil”.	20	Added reference to Resolution of the Georgian Government No. 424, dated 31/12/2013 on “Removal, Storage, Use and Recultivation of Topsoil” and statement that Reinstatement Management Plan will be prepared by Contractor.	5.7.1

Comment	ID	Response	ESIA Section Reference
An ESIA report submitted for ecological expertise should classify waste generated in the course of pipeline construction and operation in compliance with the procedure specified by Resolution of the Georgian Government No. 426, dated 17/08/2015 "On Definition and Classification of Waste Register by Types and Characteristics". Waste type name should be in accordance with the specific waste codes given in this procedure; in addition, characteristics defined in Annex III of the Waste Management Code should be considered in order to determine waste hazard. If generated waste is processed / disposed in situ, an ESIA report should list waste processing / disposal operations by codes specified in Annexes I and II of the Waste Management Code.	21	Added explanation in Section 5.8.6 that the Contractor's Waste Management Implementation Plan will classify wastes in accordance with the Waste Management Code and the new Resolution. De-oiling and cleaning will not use water, thereby avoiding the generation of oil water. No processing or disposal of waste in situ is envisaged. It is anticipated that all wastes will be transferred to licensed waste management facilities. Resolution of the Georgian Government No. 426, "on Definition and Classification of Waste Register by Types and Characteristics" has been added to Table 6-3 (Section 6.3.4).	5.8.6 6.3.4
Please be advised that according to Part I of Article 14 of the Waste Management Code physical and legal entities shall develop a company waste management plan if more than 200 tons of non-hazardous waste or over 1,000 tons of inert waste or any volume of hazardous waste are generated annually as a result of their activities in compliance with the requirements specified in this Code and Order of the Minister for Protection of Environment and Natural Resources of Georgia No. 211, dated 04/08/2015 "On Approval of Procedure for Review and Approval of Company Waste Management Plan".	22	Information noted.	-

Comment	ID	Response	ESIA Section Reference
Air emission sources and estimated emission volumes of pollutants in quantitative (g/sec) and diffusion (concentration ratios) terms in the construction process (e.g., estimated emissions during de-oiling of the old pipeline, temporary storage in tanks and fill-up of new sections, operation of generators, implementation of welding works and from other sources) should be provided in the ESIA report and associated air protection documentation specified by applicable legislation submitted for ecological review.	23	<p>Emissions to air from construction (including de-oiling) have been estimated in accordance with international good practice guidelines (including the emission estimation methodology published by the United States Environmental Protection Agency) and are provided in Table 5-9. The reported emissions cover key air pollutants of concern to the protection of human health, ecosystems and vegetation as well as global warming and are estimated quantitatively in tonnes per year (1 tonne/yr = 0.03 g/sec).</p> <p>Calculation of fugitive emissions during de-oiling have been made using US EPA TANKS software and added to Section 5.8.6.</p> <p>Whilst the emissions to air can be estimated with reasonable accuracy, air quality impacts caused by these emissions through diffusion, dilution and dispersion processes cannot be represented accurately in predictive models due to the sporadic nature of construction operations. Best practice is to control emissions at source by applying the mitigation measures detailed in Section 10.8.4 of the ESIA.</p>	5.8.6
An ESIA report submitted for ecological expertise should contain documentation confirming agreement by state agencies and organisations responsible for decision-making on separate issues associated with implementation of different design stages.	24	Noted.	-
<p>Please be also advised that an ESIA report submitted for ecological expertise should include materials on consideration of public disclosure results in the EIA process. If comments and suggestions of public representatives are not considered, the project proponent shall provide relevant written rationale together with the ESIA report.</p> <p>Documentation specified in Article 6 of the Regulation approved by Order of Minister for Protection of Environment and Natural Resources of Georgia No. 31, dated 14/05/2013 "On Approval of Regulation on Environmental Impact Assessment" should be included in or attached to the ESIA report submitted for ecological expertise.</p> <p>Technical summary (design of the proposed activity) and non-technical summary with attached graphical or other illustrating material should be submitted together with other documentation as prescribed by Clause "d"</p>	25	<p>Disclosure summary, comments log and amendments log to be included in Final ESIA.</p> <p>Technical summary and NTS have been updated.</p>	<p>Chapter 9 Appendix C2 Appendix C3</p> <p>Technical Summary NTS</p>

Comment	ID	Response	ESIA Section Reference
<p>of Article 8 of Law of Georgia "On Environmental Impact permit" in order to acquire conclusion of ecological expertise.</p> <p>As regards acquisition of ecological expertise conclusion, please be advised that the Ministry of Protection of Environment and Natural Resources will issue an ecological expertise conclusion on documentation provided by an administrative agency responsible for issuance of construction permits. Therefore, an application together with the documentation prescribed by the legislation should be submitted to the agency responsible for issuance of construction permits; the latter will ensure involvement of the Ministry of Protection of Environment and Natural Resources as other administrative agency in the administrative proceedings initiated in order to issue a construction permit as prescribed by the Georgian legislation.</p> <p>Could you please ensure that the above comments are considered in the ESIA report prior to its submission for ecological expertise.</p>			

4.2 Project Affected Communities

Comments from PACs generally referred to a number of common themes, which have been collated under each issue using the common template below (Figure 4-1).

Issue Summary: [Issue Title]

Description of Issue [Consolidated summary of feedback received on this issue]
Issue Drawn from Comments: [List of unique comment numbers addressed in this issue summary. In combination with Appendix 1, this list allows individuals to easily relate responses to a specific comments]
How comment is/will be addressed: [Where appropriate, reference has been made to relevant sections of the ESIA, including the commitment numbers, which discuss the issue or which have been amended in response to this issue]

Figure 4-1: Issue Response Summary Template

Sections 4.2.1 to 4.2.8 include summaries for all issues raised; the full list of comments is provided in Appendix 1.

4.2.1 Issue Summary: Project Description and Technical Queries

Description of Issue Public meetings' attendees have asked a variety of questions relating to the Project description and technical issues. These questions covered the following topics: <ul style="list-style-type: none">• what will happen to the redundant pipeline sections• how the re-routes were selected• when the construction will take place• what if pipeline is damaged.
Issue Drawn from Comments: 26, 27, 28, 34, 36, 39, 58, 70, 71, 82
How comment is/will be addressed: <ul style="list-style-type: none">• Redundant pipeline sections: The redundant pipeline sections will be cleaned and left in the ground. GOGC as the owner of the pipeline will be responsible for deciding what happens to the redundant sections in the future.• Route and site selection: The purpose of the project is to avoid areas of ground instability, construct more robust river crossings and ensure safe operation of the pipeline. Sections of pipeline located on the occupied territories are outside the current scope. The section which runs through South Ossetia is monitored using internal pipeline inspection techniques. WREP-SRP sections do not go directly through villages. Settlements located within 2km of the re-routes are shown in Appendix A of the ESIA.• Construction schedule: works are expected to begin in late 2016.• The pipeline is constantly monitored and repairs are carried out as necessary in order to avoid pipeline damage.

4.2.2 Issue Summary: Land Registration and Compensation

Description of Issue:

A number of questions related generically to the provision of land compensation with some specific queries raised regarding the land registration, calculations of compensation values, and how any disagreements would be resolved.

Issue Drawn from Comments:

31, 37, 38, 44, 57, 62, 72, 85, 86

How comment is addressed:

The Project land acquisition and compensation process has been documented. Agricultural land and crop prices have been based on market values based on a study carried out by specialists in each area where the WREP-SR Project will be constructed and rates have been reviewed with GOGC. Compensation amount is detailed to landowners in servitude or lease agreements.

The Project will obtain a servitude agreement for land from the registered legal owner of the land, which may be private or state-owned. The Project will work with landowners in the Project-affected areas to assist with registration of land. Registered lease holders on state-owned land will be compensated for crop loss only. Compensation of informal (unregistered) users will be considered case by case with local authorities' involvement.

A Grievance Procedure will seek to resolve any grievances related to the Project (including land acquisition) through an amicable settlement in the first instance, rather than through the judicial system. Use of the grievance procedure by complainants remains optional, at the discretion of the complainant, and will not prevent complainants from exercising their rights under Georgian law, including by applying to a Court of Law at any stage.

4.2.3 Issue Summary: Land Use and Development

Description of Issue

A number of queries were raised about land use restrictions (including construction and agriculture) at the redundant pipeline sections and at the new pipeline corridor.

Issue Drawn from Comments:

32, 50, 59, 63, 64, 66, 67, 68

How comment is/will be addressed:

There are certain restrictions that apply to the pipeline route and its vicinity in order to protect the pipeline from damage. For example, tree planting is generally not permitted except for small trees. At the Supsa river crossings, a number of activities are restricted. The restrictions are required to comply with the state zoning resolution adopted by the President of Georgia in 2009 (amended in 2013). After removal from service is complete, a decision will be made jointly with GOGC on what restrictions will be applicable over redundant pipe sections. Final layout of construction areas is being agreed taking into account the GOGC pipeline location. Any future construction projects in the vicinity of the pipeline will need to be reviewed on case by case basis. Construction permits will depend on what is planned to be build on the restricted areas.

4.2.4 Issue Summary: Employment

Description of Issue

Many comments received from PACs concerned the provision of local employment opportunities. There is a high level of unemployment in communities surrounding the proposed WREP-SR sections and local people have requested that job opportunities be made available to them on the WREP-SR Project.

Issue Drawn from Comments:

33, 43, 74, 78, 79, 81

How comment is/will be addressed:

The Project has identified Project-affected communities (PACs), which are those communities defined in the ESIA Section 9.4.2 and include communities that are on/within a 2km boundary either side of the pipeline centre-line resulting in a 4km-wide zone

Several commitments within the ESIA relate to the provision of local employment opportunities:

- BP's policy on local recruitment will be publicised e.g. via media announcements at regional and national levels (28-01)
- Unskilled labour will be preferentially recruited from the Project affected communities (28-02)
- Applications for employment will only be considered if submitted via the official application procedure (28-03).

The majority of employment available will be temporary in nature and predominantly during the construction phase of the Project.

4.2.5 Issue Summary: Infrastructure and Services

Description of Issue

A number of questions were asked about impacts on roads from construction traffic and how these impacts will be managed.

Issue Drawn from Comments:

55, 56, 60, 61, 59

How comment is/will be addressed:

The Project has a number of commitments regarding the access roads to address potential impacts from construction traffic:

- A pre-construction survey will be undertaken to record the condition of access roads, laydown areas, rail offloading area and any special features along the pipeline ROW to inform the reinstatement work (17-14)
- The contractor will be expected to use the designated access roads. The selection of any further access roads to Project working areas will aim to avoid sensitive receptors and will be subject to Company approval (30-22)
- Following construction, the Contractor will repair roads to at least their pre-construction condition. For roads that have been upgraded, the Contractor will submit a close out report for Company approval (37-07).

4.2.6 Issue Summary: Community Investment

Description of Issue:

Representatives of PACs were interested if the Project will provide financial aid to local projects, such as restoring sections of local roads and construction of a kindergarten.

Issue Drawn from Comments:

29, 30, 35, 40

How comment is addressed:

WREP has a Community Development Programme which supports start up businesses. The Project will carry out repair and maintenance only of access roads.

4.2.7 Issue Summary: Community Safety

Description of Issue:

One public meeting attendee asked how the pipeline will be marked.

Issue Drawn from Comments:

65

How comment is addressed:

During the meeting it was explained that aerial markers are installed at each kilometre along the pipeline and at locations where there is a change in direction so that it clear where the pipeline is located underground.

4.2.8 Issue Summary: SCPX Construction and Operation of Supsa Terminal

Description of Issue:

A number of comments received were not directly related to WREP-SR Project and concerned employment on SCPX pipeline construction and complaints about Supsa Terminal operation.

Issue Drawn from Comments:

41, 42, 45, 46, 47, 48, 49, 51, 52, 53, 54, 75, 76, 77, 80, 83, 84

How comment is addressed:

Individuals were asked that as the focus of the meetings was to discuss the WREP-SR Project, they should submit their comments on the SCPX project and existing operations via the current grievance mechanisms. The local Community Liaison Officer was present at the meeting in Lanchkhuti and could be approached to log any complaints relating to Supsa Terminal.

Appendix 1: List of Comments Received from PACs

Table 4-2: Draft ESIA Comments – Project Affected Communities

Comment	ID	PAC Affiliation ¹	District/City
In general, what is the pipeline rerouting linked to?	26	n/a	Sachkhere
A certain segment of the pipeline is located on occupied territories; will this segment be relocated to our territory? Are such pipeline segments monitored by you?	27	n/a	Sachkhere
Is our district affected by the sectional replacement of the pipeline?	28	n/a	Sachkhere
Shall we get any benefit from this project?	29	Korbouli	Sachkhere
Village Korbouli suffers from damaged roads. Please assist us in restoration of the said roads; we are already equipped with appropriate technology, however if you could at least provide us with fuel, it would pose a significant help to us.	30	Korbouli	Sachkhere
Is the local population responsible for registration of the land in the public registry, which the new section of the pipeline (within approximately 100 meters distance from the old pipeline, as you have previously mentioned) runs through?	31	Sveri	Chiatura
Can you provide us with the maps? Where in particular are the new sections are located? We need to know where the pipeline is located exactly in order to avoid any future problems and to provide this information to the local population. As majority of the land proprietors are represented by elderly people unable to cultivate the land, we need to be aware of whose land the project will affect. The lady has stated above that the procedures are conducted within the frames of the law, which is understood.	32	Mandaeti	Chiatura
Our primary interest is with respect to the employment of local population and workers as well as clarification of land related issues. Presentation mentioned 350 people, what does this mean?	33	Mandaeti	Chiatura
Will you leave old pipes as a reserve?	34	Mandaeti	Chiatura
Project area (road) was gravelled 4 months ago, however a small, 1 km section (from Mandaeti) remains in poor condition (Sveri-Darkveti connecting road).	35	Sveri	Chiatura
In the event of municipality raising the issue regarding the use of (abandoned) pipe, will we be allowed to utilize it?	36	n/a	Chiatura
What happens when the landowner does not accept proposed conditions /compensation? What do you do in such cases?	37	n/a	Chiatura
Can the amount of funds compensation established by the expertise be changed?	38	n/a	Chiatura

¹ N/A indicates cases where the comment originator is not a resident or representative of the Project PAC, but rather comes from a wider area, e.g. is a representative of a municipality or a resident of a settlement outside of 2km corridor.

Comment	ID	PAC Affiliation ¹	District/City
When does the construction commence?	39	Zeda Beretisa	Chiatura
There is kindergarten located on one of the access roads. Rehabilitation works of the said kindergarten have already started, however were not completed due to certain financial problems. You financed such projects previously and we still remember the benefits of your assistance, so we kindly ask you to support us in frames of social projects.	40	Zeda Beretisa	Chiatura
We are interested to know on through which specific lands the pipeline will go through. Pipeline corridor is essentially swamped. Over the years, the corridor has been expanding and has now lost its original form; furthermore, the land is damaged and no harvest has grown on the territory for approximately 15 to 20 years. Meanwhile, due to the western winds, Grigoleti and Supsa residents are being disturbed by the stench, consequently the monitoring must be executed conducted during the period when westerns winds blow and when the mentioned discernible smell is present. The "pump" works were active even last night and the smell was evident. The company has always assured us that the air pollution monitoring was being conducted and everything was in check, however local population is still facing pollution problems, while the crops are being damaged. The timing and means of the air pollution monitoring is also noteworthy. I have discussed the mentioned issues with the company representative Zura Mghvdiashvili, however solely this measure is not sufficient; therefore we need to have a constant communication between the two parties on the said problems.	41	Supsa	Lanchkhuti
I would like to speak of Supsa as a celebrated agriculture sector, in terms of vegetables, for instance Supsa cucumbers and tomatoes used to be widely renowned. Now, I do not doubt the impact reports that the ministry publishes, I have rechecked the fact many a time and the quantity of the harvested crops are accurate, however they are of poor quality. Furthermore, migratory birds are dying in the vicinity of the Supsa terminal and are gathered by the sacks.	42	Supsa	Lanchkhuti
As for the employment prospects, we express hope that at least 50 out of the mentioned 350 people from the villages in the vicinity of the Supsa terminal project will be employed.	43	Supsa	Lanchkhuti
With respect to the primary land registration required for the residents, it should be noted that not all residents would be able to afford it.	44	Supsa	Lanchkhuti
What do you mean exactly when you speak of referring to you with a specific problem?	45	Supsa	Lanchkhuti
A meeting with us was held on February 5 during which the question of significance of the study in our area was brought up, people demand conduction of said study, however 4 months have passed since. Today, we are once again holding a meeting and calling it such for the sake of it, while residents still remand conduction of the study, which would enable us to ease our concerns, and not associate BP with the made errors and seek other sources of investigation. Mrs. Ketis has offered us to publicize Anaseuli laboratory tests so as to provide us with an alternative analysis result against which we could compare our tests. In any case it is clear that your contactor will be biased towards your innocence, right? In order to no keep holding pointless meeting within these 4 months, we would like to view the results of the studies conducted by you.	46	Supsa	Lanchkhuti

Comment	ID	PAC Affiliation ¹	District/City
Are we to understand that you collect samples and test them during the air monitoring process?	47	Supsa	Lanchkhuti
Do you test the air on site or do you take it for examination? You won't be able to find anything on the terminal premises; the aforementioned smell is located where the vicinity where the winds blow.	48	Supsa	Lanchkhuti
A meeting with us was held on February 5 during which the question of significance of the study in our area was brought up. Today, we are once again holding a meeting, I would like to know why have the previously posed issued still not been responded to? We would like to view the results of the specific monitoring conducted by you, in order for us to share it with the local population.	49	Supsa	Lanchkhuti
There are certain restrictions posed in the near vicinity of the underwater pipeline, is there a possibility of changing these restrictions? Terminal does not allow us to conduct certain activities.	50	Supsa	Lanchkhuti
Primary concern of our population is represented by the two types of environmental effects, one relates to the physical outcome, namely damage to infrastructure, irrigation systems, roads and yards, land bogging, which are relatively easily resolvable, while the second outcome is more complicated as it relates to the long-term chemical effects on the air, soil, and agricultural lands, as a result our lands are ecologically polluted. From an ecological standpoint, what percentage share correlates to the air and soil pollution from oil related issues? How can you prove us that your comprehensive research is exhaustive?	51	n/a	Lanchkhuti
But what happens when oil interacts with the air?	52	n/a	Lanchkhuti
Why have the so-called projectors being lowered? Do they have affect on oil evaporation?	53	Supsa	Lanchkhuti
Local population has conducted studies themselves according to which 80% of the Supsa residents have died with cancer.	54	Supsa	Lanchkhuti
What can you tell us about the road rehabilitation works? Will such works occur?	55	n/a	Mtskheta
You have previously mentioned that traffic routes will be explored as well as possible. Is construction of additional roads by the project likely; have you already devised scheme or project of supplementary roads?	56	n/a	Mtskheta
Are you aware whether any provable land plots will be located in that area?	57	n/a	Mtskheta
I would like to know whether any restrictions will be imposed for the non-operational sections or those drained of oil? We are interested in what activities can be conducted above ground. For instance, building is currently forbidden in the vicinity of the vacated empty pipe during construction process, will it be allowed after the completion of the works?	59	n/a	Mtskheta
Highway will represent our greatest challenge when the issue of alternative/additional roads is brought up; can you guarantee that the repair works will be executed in the event of highway damage, or does this depend on the good will of the contractor company?	60	n/a	Mtskheta
We should wait for the announcement of the tender winner contractor, since it will decide which roads are needed. But, will this issue be negotiable?	61	n/a	Mtskheta
What amount of land compensation will the local inhabitants will receive?	62	n/a	Mtskheta

Comment	ID	PAC Affiliation ¹	District/City
We are interested specifically through which individuals' land plots does the project pipeline run through? We would also like to be provided with the proposed pipeline plan and coordinates.	63	n/a	Mtskheta
We are requesting old and new maps in order to protect the expropriation lines, and know how to act if someone attempts to use it for construction purposes.	64	n/a	Mtskheta
Are any checkpoints present along the pipeline? I think there should be a large flagpole installed.	65	n/a	Mtskheta
Construction is booming, 7-8 projects are submitted to me every three months with the request for construction permit along the pipeline strip.	66	n/a	Mtskheta
If you install the up to date maps within the construction range, we would not have to address you anymore for information regarding particular locations where construction is permitted.	67	n/a	Mtskheta
BP needs to determine whether certain constructions, predominantly farms and industrial structures, are permitted to be constructed on these areas.	68	n/a	Mtskheta
It would be suitable if we require the contractor company to maintain the roads in their original state, as I am certain that the movement heavy equipment will cause some damage to the roads.	69	n/a	Mtskheta
What if the pipe gets damaged, what happens in this case?	70	n/a	Mtskheta
Does the pipeline go through the villages?	71	n/a	Gardabani
Does the pipeline affect only two local residents in Gardabani?	72	n/a	Gardabani
Does the pipeline impact any historical monuments in Mtskheta?	73	n/a	Gardabani
You have no information regarding the number of people planned to be employed, correct?	74	n/a	Gardabani
On SCPX people from Tbilisi are generally being employed as opposed to the residents of Gardabani; they bring their own personnel from Tbilisi, which deprives the locals ability of being employed.	75	n/a	Gardabani
Who can be addressed in the written appeal with regards to the employment?	76	n/a	Gardabani
People from Tbilisi and Marneuli are employed by the BP project. They transport them with their own busses for commute.	77	n/a	Gardabani
Employment of specialists is one story, however we are currently discussing that of unqualified workers.	78	n/a	Gardabani
We have various specialists among the local population, welders are one example.	79	n/a	Gardabani
Every organization has a public relation officers who work on the site. However, we need to establish why we were not hired, which can be discussed and resolved with them.	80	n/a	Gardabani
I would like to know which specific field specialists do you require within the project?	81	n/a	Gardabani
When will the construction works commence?	82	n/a	Gardabani
Employment of workers commonly occurs on the acquaintanceship basis.	83	n/a	Gardabani
We have submitted applications 3 times this far, there was no lottery based employment opportunity in Gardabani, as opposed to Qesalo was Jandara, why aren't we being reviewed?	84	n/a	Gardabani

Comment	ID	PAC Affiliation ¹	District/City
What amount of the harvest compensation do you intend to provide to the local residents?	85	Avchala, Gldani	Avchala-Gldani Khevi
Where will the assessment take place? Will an auditor be involved in the evaluation process?	86	Avchala, Gldani	Avchala-Gldani Khevi