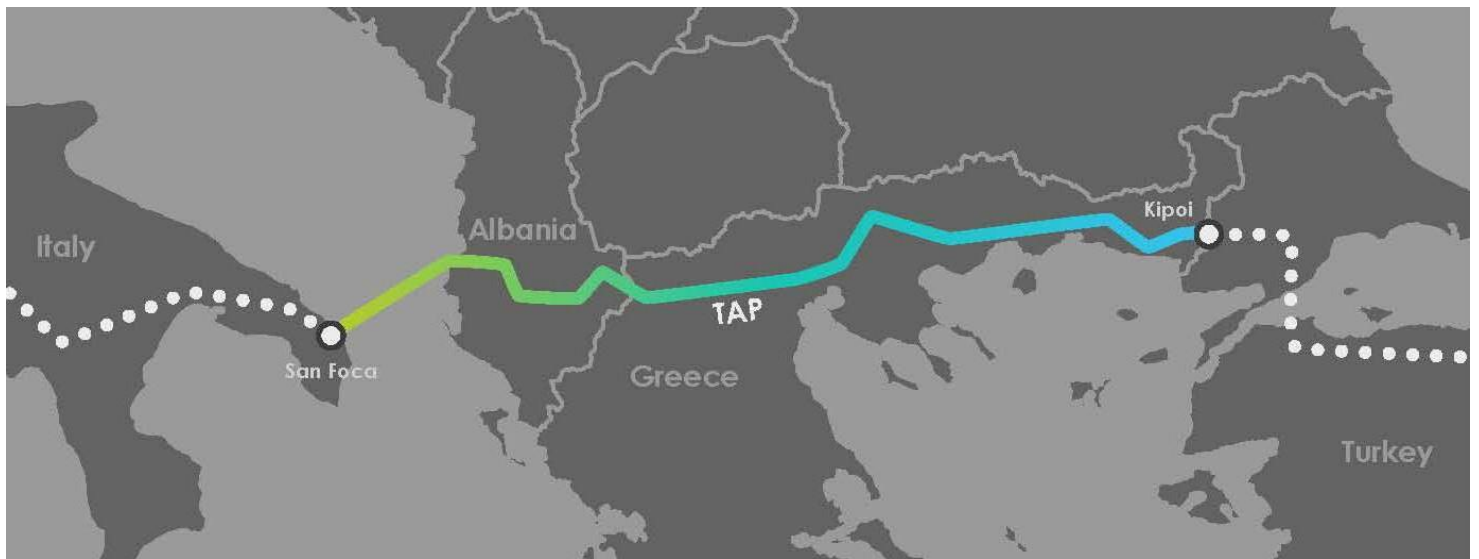




Trans Adriatic  
Pipeline



## Italy Stakeholder Engagement Plan

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## List of Acronyms and Abbreviations

CCP	Contractor Control Plan
CLC	TAP Community Liaison Coordinator
CLO	EPC Contractor Community Liaison Officer
CO	Country Office
CSO	Cadastral Survey Office
CSR	Corporate Social Responsibility
EBRD	European Bank for Reconstruction and Development
EIB	European Investment Bank
EPC	Engineering, Procurement, and Construction Contractor
E&S	Environmental and Social
EIA	Environmental Impact Assessment <sup>1</sup>
ESIA	Environmental and Social Impact Assessment
EU	European Union
GA	Government Affairs
GIS	Geographic Information System
GLAC	Guide to Land Easement, Acquisition and Compensation
HGA	Host Government Agreement
IFC	International Finance Corporation
IPMT	Integrated Project Management Team
IPRO	Immovable Property Registration Offices
KP	Pipeline Kilometre Point
KPI	Key Performance Indicator
LEA	Land Easement and Acquisition
LGU	Local Government or Administrative Unit
LM	Land Management
LRF	Livelihood Restoration Framework
LRP	Livelihood Restoration Plan
LATS	Livelihood Assistance and Transitional Support
MoE	Ministry of Environment
MoM	Minutes of Meeting
NGO	Non-Governmental Organisation
OECD	Organisation for Economic Co-operation and Development
PAPs	Project Affected People
PMCI	Project Management Contractor Italy
PR	Performance Requirement
RoW	Right of Way
SEAP	Stakeholder Engagement Action Plan
SEI	Social and Environmental Investment
SEP	Stakeholder Engagement Plan
SFM	TAP Social Field Monitor

<sup>1</sup> Italian law provides for an EIA. The EIA decree for TAP was released on September 2014. In 2013 TAP also conducted an Environmental and Social Impact Assessment (ESIA) in preparation for the EIA procedure submission. References to EIA in this document also refer to all the preparatory activity performed.

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SGMT Stakeholder and Grievance Management Tool  
SLA Secure Land Access  
TAP Trans-Adriatic Pipeline  
TEP Tier 1 Engagement Plan

# 1. Introduction

## 1.1 Purpose and Objectives of the SEP

This Stakeholder Engagement Plan (SEP) provides the framework for external stakeholder engagement in the Italian and Offshore sections of the Trans Adriatic Pipeline (TAP) project and is aligned with TAP's Stakeholder Engagement Strategy.

This is a live document and will be updated as needed. This issue of the SEP focuses mostly on the engagement planned during the construction stage.

The specific objectives of this SEP are to:

- Provide an outline of planned stakeholder engagement during the construction stage of the project, in line with project standards, and indicate how the Plan will be updated in preparation for operations.
- Ensure regular, accessible and transparent consultation with stakeholders.
- Build constructive, long-term relationships, based on two-way dialogue and communication aimed at attaining broad community support among affected communities.
- Provide the framework for ongoing stakeholder identification, analysis, mapping and prioritisation; consultation and engagement; risk and issue identification, information sharing, and documentation of engagement and required follow-up actions.
- Build on previous engagement efforts during the Environmental and Social Impact Assessment (ESIA) and Land Easement and Acquisition (LEA) phases by introducing suitable mechanisms for sharing information and receiving feedback, acknowledging key issues raised by stakeholders, assisting TAP to understand stakeholder expectations and facilitating stakeholder input relating to the project.
- Define the roles, responsibilities and resources necessary to implement the SEP, including the procedures to monitor and follow up on stakeholder feedback and grievances.

## 1.2 TAP Engagement Commitments

In Italy and the Offshore section, TAP has committed to the following specific actions:

- Promoting meaningful engagement in Italy.
- Ensuring the contents and actions covered in the SEP are understood by all Stakeholder Engagement Functions in Italy and Offshore Section, including field staff.
- Ensuring key national, regional, and local stakeholders affected by the pipeline as well as other stakeholders who have an interest in TAP, its impacts, benefits and opportunities are identified.
- Engaging with these stakeholders in a dialogue on social, environmental, safety, security and other relevant issues through regular, free, prior and informed consultations.
- Disclosing relevant project information to project stakeholders.
- Promoting awareness and understanding of TAP's Stakeholder Engagement process, ensuring an open, two-way flow of information, transparency and accountability.
- Ensuring compliance with the Stakeholder Engagement Strategy and other TAP Management System documents that relate to stakeholder engagement.
- Ensuring compliance with project standards
- Providing the necessary training to internal parties on topics related to stakeholder engagement.

## 2. Project Stakeholders

### 2.1 Stakeholder Identification

Stakeholder identification has been, and will continue to be, carried out with the objective of establishing which individuals and organisations may be directly or indirectly affected (positively and negatively), by TAP's activities or may have an interest in or influence on the project.

As part of the TAP stakeholder identification process, the following were considered:

- TAP's potential impacts during construction and operation.
- What type of stakeholder engagement is mandated by law and project standards.
- Who is likely to be affected (directly or indirectly) by potential impacts in the project's area of influence.
- Who are the vulnerable groups requiring special engagement efforts.
- Who supports or opposes the changes that TAP's activities and projects will bring and why.

TAP stakeholders identified in accordance with the above fall into one of the following groups:

- **Directly affected population:** including all owners and users of land, sea and other resources affected by project land access.
- **Project affected communities:** This includes the residents and businesses of the communities in the project area of influence<sup>2</sup>.
- **Vulnerable groups:** stakeholders affected directly or indirectly by project land access and who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, refugee/migrant status, age, disability, economic disadvantage or social status, may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits. This may include women, ethnic minorities, children, young people, the elderly or retired, single-headed families, households with low income, disabled people, households with no legal rights to land, or households dependent on limited land of low productivity.
- **National Government:** government ministries, state agencies, parliamentary committees and regulators.
- **Regional and municipal government:** including the administrations of the government of the Region of Puglia and of the municipality of Melendugno in the province of Lecce in Puglia.
- **Public authorities:** education, health, hospitals, civil protection and ports.
- **Local businesses and operators, agricultural institutions and associations**
- **NGOs and civil society:** national and international NGOs, charities, associations, think tanks and observatories.
- **Media:** TAP has attracted considerable national, regional and local media attention and regularly communicates with journalists.

Early in the project, TAP developed a Stakeholder and Consultation Database as a tool to maintain the list of individual stakeholders identified in each group above and to help manage relationships with them. This database documented stakeholders' specific interests in the project, as well as, issues, concerns and relevant questions raised during consultations. The system recorded Minutes of Meetings (MoM), information on meeting agendas,

<sup>2</sup> Communities within the area impacted (directly and indirectly) by the Project including the supporting facilities operated by EPC contractor.

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attendance, questions and answers, decisions and information disclosure, as well as management of actions and commitments.

In early 2016, TAP decided to revise the stakeholder management system and engaged a specialist database development consultant to devise an enhanced stakeholder database. This revised system has been integrated with TAP's Grievance Management process and is known as the Stakeholder and Grievance Management Tool (SGMT). Its operation is based on inputs by the in-country stakeholder-facing functions and managed by a dedicated Stakeholder Database Analyst based in Baar, Switzerland, together with the Grievance Advisor in Italy who manages the grievance component of the system.

The SGMT:

- Details the various stakeholders and stakeholder groups
- Details any consultations or meetings held and information provided
- Comprises a record of specific grievances lodged and the status of their resolution and
- Incorporates an automated stakeholder mapping function.

The SGMT also prioritises stakeholders and tracks issues through to closure. The SGMT is used to systematically document detailed information on stakeholders and to record engagement sessions, meetings and outcomes based on information fed into the database. Where data is entered by contractors, the in-country social experts review these entries.

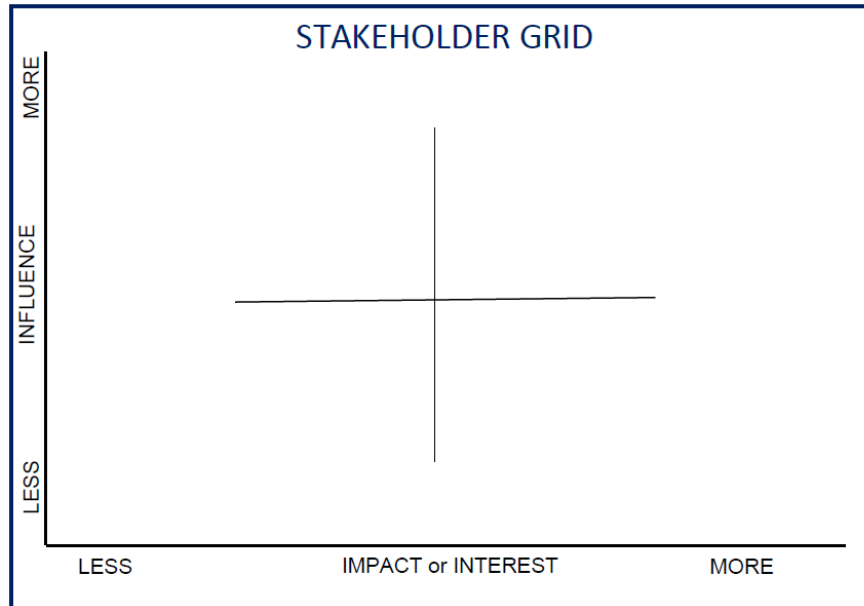
## 2.2 Stakeholder Analysis, Mapping and Prioritisation

To define stakeholder relationships, stakeholder vulnerability, their importance to TAP and stakeholder influence on TAP's activities, stakeholders are assessed and mapped according to influence, interest and the degree of potential impact. The Italy country team has developed regional stakeholder maps and related stakeholder registers. The objective of this stakeholder mapping exercise has been to improve the efficiency and effectiveness of pro-active and reactive engagement, and to identify any potential risks and issues that TAP may face. This approach also helps TAP understand the stakeholder interfaces, stakeholder issues, to set priorities, and to decide on specific techniques for achieving effective stakeholder participation.

The matrix presented below is used during stakeholder mapping to determine the importance of the various stakeholders. The matrix has helped the classification of the stakeholders and the definition of the degree to which a stakeholder is affected or can impact the project. Alignment on the vertical axis indicates the ability of stakeholders to influence the project or, other stakeholders. Impact or interest, along the horizontal axis, refers to the degree to which stakeholders are interested in the project (their level of involvement).



**Figure 2.1: Stakeholder Prioritization Matrix**



Stakeholder mapping guides the degree of effort required in working with the stakeholder on an on-going basis. After prioritising stakeholders, the information is used to determine the degree to which TAP interacts with each stakeholder.

TAP recognises that there is a continual need to maintain and update the list of individual stakeholders and their ranking as this informs TAP’s interactions with these stakeholders as the project proceeds through the various implementation stages. In doing so, TAP is committed to respecting people’s privacy and the confidentiality of personal data. Regular outreach to all stakeholders is planned to identify additional interested parties, identify any potential gaps in coverage and update the list.

The mapping as described above is being transferred into the SGMT which will be used by TAP to automate stakeholder mapping updates and, based on ongoing stakeholders` activity, their interaction with the project and the stakeholder engagement activities as recorded by the stakeholder engagement team`s inputs to the SGMT tool.

Stakeholder information in the tool`s database allows the generation of stakeholder maps that, by using specific criteria and filters (e.g. type of stakeholder, geographic information and so on.), can be customised to address analysis and engagement needs.

This function will greatly improve the ability to generate mapping of individual stakeholders and communities as needed. The previously used “manually-generated” maps had several limitations due to the considerable number of stakeholders to be mapped.

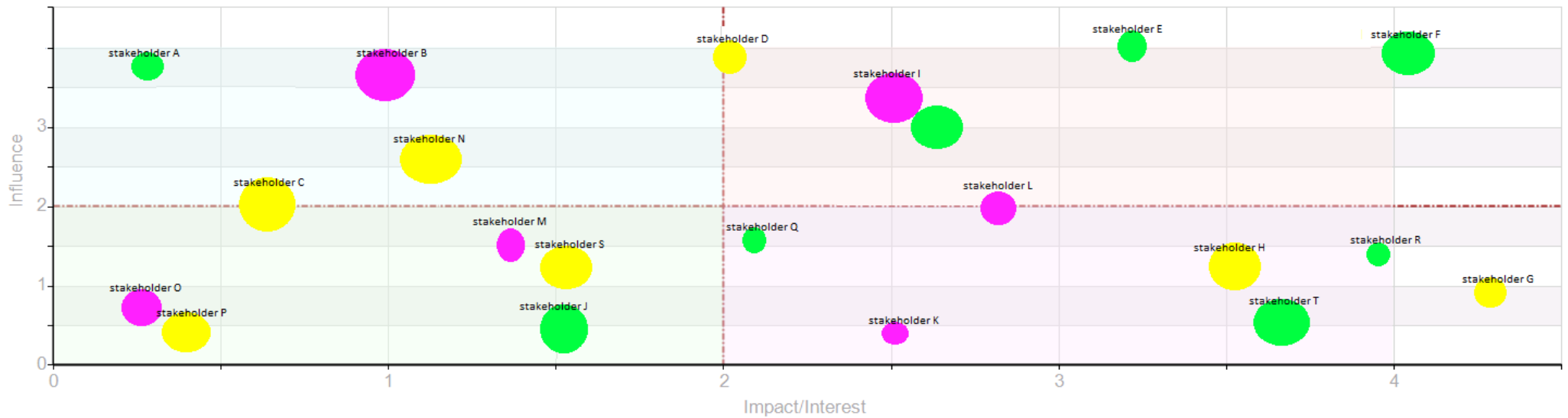
An example of an SGMT-generated stakeholder map is provided in Figure 2.2 overleaf.

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Stakeholder mapping is reviewed and updated on a quarterly basis and as part of this process the automated SGMT-produced mapping is also checked and verified by TAP's stakeholder-facing functions to ensure that it reflects up-to-date relationship dynamics and spheres of influence.

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Figure 2.2: SGMT-generated stakeholder map (for illustration purposes only)



## 3. Stakeholder Engagement Completed to Date

### 3.1 Introduction

TAP has been proactively engaging stakeholders since 2008 through structured, on-going dialogue, as required by law and by project standards. TAP Italy's leadership and stakeholder engagement professionals have been engaging regularly with regional, municipal and community leaders and officials, keeping them updated about the project, gathering field information, and answering concerns and requests. The extensive process of route selection and optimisation for the offshore pipeline landfall, onshore pipeline route and the site selection for the PRT, has helped the project to avoid, as far as possible, physical displacement, environmentally sensitive or protected areas and known cultural heritage. This has been accomplished through discussions with key stakeholders, responses to requests submitted through the grievance mechanism and discussions with the authorities to identify solutions.

TAP has used a variety of methods to communicate with stakeholders at various stages of the project. These have included:

- Project offices (i.e. project information points).
- Public display processes.
- One-to-one and small group meetings, particularly with government officials.
- Community public meetings.
- Brochures and posters.
- TAP website.
- Social media (i.e. text messages and blogs).
- Electronic media (radio & TV), digital media and advertising.

### 3.2 EIA and LEA-based Engagement

#### 3.2.1 EIA Engagement

Stakeholder engagement during the EIA process was completed in five phases to ensure that a coordinated, comprehensive, consistent and culturally appropriate approach was taken for consultation and project disclosure. These phases comprised the following:

- Pre-scoping
- Route refinement
- Scoping
- Main EIA Phase
- EIA finalization and disclosure.

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Italian law provides for an EIA procedure for projects such as TAP. The EIA decree for TAP was released in September 2014. In 2013 TAP conducted an Environmental and Social Impact Assessment (ESIA) in preparation for the EIA procedure submission.

In accordance with Italy EIA legislation, TAP also held public hearings at the different EIA phases, in close collaboration with the Ministry of Environment (MoE) and other government authorities. Between October 2012 and July 2013, TAP conducted nearly 170 meetings with national, regional and local stakeholders. The scope of these meetings covered:

- Bilateral or group meetings with PAPs and interested communities to provide project information, discuss impacts and mitigation measures, understand concerns and answer questions.
- Focused 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
- Individual face to face meetings within the initially designed 2km corridor to provide information about the project, impacts and mitigation measures, identify the concerns of stakeholders and to answer questions
- Creation of information pages in local newspapers 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 at different settlements in the affected area
- Letters to households in Melendugno to provide information about the project and EIA activities and surveys
- Development of the TAP website, Facebook, Twitter and YouTube pages to provide announcements, project documents, reports and contact details for interested parties requesting further information.

In all cases, formal Minutes of Meetings (MoM) and evaluation forms were completed.

During the main ESIA phase of engagement, issues were raised relating to potential project impacts and benefits. The issues have been broadly categorised into the following areas:

- TAP Project: The diverse range of questions 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 raised on how a range of impacts would be managed. Examples include: Noise and disturbance, potential contamination of water resources, interaction with local development areas, tourism, agriculture activities and cultural heritage.
- Project benefits: Stakeholders asked questions on benefits they might receive from the project. These questions were sometimes articulated as community needs. Key areas of benefit raised were: Road improvements and improvement to community infrastructure.
- Purchase of gas: The potential for the project to 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 were some concerns about the health or safety implications of the gas pipeline and associated facilities.

A full description of the issues raised and an analysis by region can be found in section 7 of the ESIA. The mitigation measures devised to address project impacts (including those raised as issues during consultations) are included in section 8 of the ESIA and information on routing alternatives is contained in Annex 2. Formal approval of the ESIA submitted by TAP for the Italian section of the pipeline was given in September 2014, when the Italian Minister of Environment signed the Decree of Environmental Compatibility.

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### 3.2.2 LEA Engagement

From the earliest stages of planning TAP engaged extensively with landowners and users via the LEA process. During this process TAP carried out extensive research and interviews to identify the land owners and users of the affected parcels. As a first step in the engagement with these stakeholders, a letter was sent in July 2015 to all potentially affected landowners. The letter stated the recipients affected by the pipeline route and related infrastructure and informed them of TAP's intention to discuss the land easement and acquisition process, and providing TAP's contact details for additional information. TAP then initiated a door-to-door communication campaign to distribute a brochure about the LEA process and to collect relevant contact details of the affected land owners and users.

The Secure Land Access process (SLA) was implemented in several stages, starting with an initial asset and census verification meeting. In these meetings, the TAP team checked the affected land assets and the ownership or lease land titles with the landowners. This was then followed by a second meeting to discuss the economic proposal and then a third meeting to discuss additional questions or concerns.

The LEA team has continued to meet regularly with PAPs to agree on compensation packages and address any concerns related to project-related land easement, acquisition and reinstatement with attention and special accommodations given to those PAPs considered most vulnerable. Throughout this engagement process, preference was given to smaller and one-on-one meetings to allow for more in-depth conversation than to a large forum so as to respect privacy concerns of the stakeholders involved. Through this process of engagement, TAP could undertake over 220 meetings with individual PAPs, on average 1.5 meetings per affected landowner.

Having obtained all required land rights, TAP continues to engage with land owners and users. Any additional land take requirements will be conducted by the PMCI in cooperation with TAP and in accordance with TAP's principles and processes. TAP remains accountable for stakeholder engagement with any new land owners and users.

### 3.2.3 Post-EIA Engagement on Project Impacts

Since the EIA was submitted in September 2013, open public meetings with local communities and relevant local authorities were held along the pipeline corridor on EIA and LEA-related issues and disclosure. Other engagement activities in the period 2013-2015 included:

- 3 public meetings in Borgagne (suburb of Melendugno) in March and April 2013.
- 8 local open-air markets with a TAP information point (Melendugno, Borgagne, San Foca, Castri, Vernole) in May and July 2013.
- Project information delivered by mail to all Melendugno citizens, following the activities in the open-air markets.
- Attendance at the OST (Open Space Technology) event organized by Puglia Region for public debating on the AP Project at Borgagne and Lecce, November and December 2013.
- Community meeting with a group of citizens living in proximity to the PRT area, February 2016.
- Regular meetings with small groups of stakeholders to keep them informed and address concerns (May 2013 to date).
- Media information campaigns at national, regional and municipal levels in 2013, 2014, 2015.
- Information campaigns for landowners, door-to-door information mailing, June-September 2015.
- Regular website and social media updates on Facebook, Twitter and YouTube
- Individual, face-to-face meetings in offices, residences and other locations.

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- To provide prompt replies, correct information and to show TAP availability to an open dialogue, in October 2016 TAP decided to open an Infopoint in the very centre of Melendugno: an easy reachable, friendly and direct channel for the community to interact with TAP.

From a communications perspective TAP has been working on many levels;

- Media information campaign at national, regional and municipal level, December 2013
- Media information campaign at regional and municipal level, April 2014
- Media information campaign at national level, May 2014
- Media information campaign, at regional and municipal on the compatibility between pipeline and tourism, summer 2014
- Information campaign at regional level, October-December 2014.
- Media information campaign at regional and municipal level on safety aspects of the project, April 2015.
- Media information campaign on pipeline and tourism, summer 2015
- Information campaign for landowners, door-to-door mailing, June-September 2015

Moreover, TAP has a constant dialogue with local and regional journalists, in order to provide constant and transparent information.

### 3.3 Social and Environmental Investment-Related Engagement

The goal of the TAP Social and Environmental Investment (SEI) Programme is to contribute, in a sustainable and inclusive way, to improved livelihoods and quality of life within local communities in proximity to the project.

TAP's SEI strategy explicitly seeks to align SEI with communities, civil society and government, to create shared value and to build relationships that support construction. TAP SEI is delivered using several principles including that of participation, defined as ensuring community-level involvement in the design and development of TAP SEI projects, and in the decision-making processes associated with such projects.

In support of the SEI programme, quantitative and qualitative analysis was commissioned from market research agencies for an initial assessment of social and community needs and expected patterns for community development.

An initial study was performed in December 2014 and consisted of two web discussions involving two groups of stakeholders, each of 20 Lecce province residents. This initial assessment was then supplemented with one-on-one interviews in the spring of 2015 to further identify SEI needs and opportunities. The surveys performed identified the areas in environment, development, tourism, fishing, agriculture, infrastructures and services of most interest to stakeholders and to be addressed in the frame of TAP SEI programme. A comprehensive study of the territory, its features and potential for growth was performed in July 2015 by TAP's SEI implementing partner. The study consisted of a series of informed interviews with community representatives that was matched with an in-depth desktop analysis and on-site visits to cultural heritage sites in the project area.

In 2016 TAP Italy initiated its first SEI project aimed at sustaining community development. The project consists of a small grants program for local NGOs, called TAP Start (to take place bi-annually throughout TAP's construction period) and a capacity building programme for restaurant owners of the Province of Lecce (MENA). This has been followed by the launch of a socio-environmental programme directed at the clean-up and prevention of marine litter accumulation. The Marine Litter Project was implemented in January 2017, with involvement of the Italian National Consortium for Marine Sciences (CONISMA), UniSalento and local NGOs. In April 2017, TAP

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launched 4 English courses and 2 ICT course and in September 2017 the second edition. In September 2017, a first agreement with fishers community was signed to start the multi-year project.

In addition, in August 2017 a committee was convened by the National Government to discuss SEI project proposals and set concrete measures of investments in Puglia Region with the participation of all the interested parties; Ministry of Environment, Ministry of Economic Development, Ministry for Territorial Cohesion and Southern of Italy, Presidency of the Council of Ministers, TAP and Snam, Apulia Region, Melendugno Municipality, Confindustria and Trade Unions.

### 3.4 Local Content-related Engagement

Local content engagement with EPC contractors, local businesses and other key stakeholders is performed continuously, with a focus on identifying opportunities for the local businesses and workforce within the pipeline's area of influence and the framework of the EPC contracts assigned, and, in accordance with the applicable legislation (EU Public Procurement Rules) and Italian procurement best practice (as per Protocollo di Legalita provision authorities<sup>3</sup>).

TAP has made considerable efforts to facilitate the relationship between local companies and the EPC contractors that were selected in accordance with EU Public Procurement rules. This has included removing barriers that limit the participation of local firms and the dissemination of general information on the EPC contractor's tender process, as well as organising networking events between tenderers and potential local subcontractors; TAP organized four networking events (May 2014, July 2015, February 2016, May 2016) aimed at introducing local businesses interested in subcontracting to TAP EPC contractors in Italy, providing collaboration opportunities with the awarded contractors for the EPC PRT and EPC Onshore and Offshore Pipeline section and local job opportunities.

### 3.5 Outreach Engagement

As part of its outreach programme, TAP interacts with stakeholders across the project's footprint to enable open and transparent dialogue.

TAP's outreach engagement, not linked to any specific project activity, is carried out on an on-going basis and is intended as an opportunity for stakeholders, individuals or communities, to voice concerns, explain their interests, and otherwise initiate and maintain constructive dialogue with TAP. Through outreach engagement, the project carried out thematic campaigns and consultation processes including perception surveys and introductory meetings, to build shared understanding amongst stakeholders on specific topics that will inform TAP's longer-term stakeholder engagement strategies.

In October 2016, as part of its continuous outreach and proactive stakeholder engagement, TAP also opened a public information point in Melendugno, located in a very central and visible area of the village. This public information point demonstrates the company's physical presence in the project area and its transparent and open approach towards stakeholders and communities.

TAP's Communications team has focused on maintaining, protecting and enhancing the project's reputation among its international, national, regional and local stakeholders in Italy by engaging with national media, participating in key conferences, milestone events, roundtables, and conducting advertising and media campaigns.

<sup>3</sup> Pending signature of Prefect of Lecce



## 4. Stakeholder Engagement Programme

### 4.1 Organisation and Responsibilities

TAP stakeholder engagement is performed by an Integrated Stakeholder Engagement Team of staff from Stakeholder Management, Land Management (LM), Environmental and Social (E&S) Management, SEI, and Government Affairs functions, as well as by dedicated EPC contractor personnel.

The stakeholder engagement responsibilities of the Italy stakeholder engagement staff are summarised in table 4.1 overleaf.

The in-country Integrated Stakeholder Engagement Team members are supported at TAP corporate level by the following corporate functional leads who provide guidance and ensure consistency of practice across the host countries:

- Corporate Stakeholder Manager
- Corporate SEI Manager
- Corporate Government Affairs Manager
- Corporate LM Manager
- Corporate Grievance Advisor
- Senior Social Performance Advisor.

**Table 4.1: Stakeholder Engagement Responsibilities**

Stakeholders	Stakeholder Management Function					Land Management Function		E&S Management Function			EPC
	Stakeholder Manager	Community Liaison Coordinator	Public Affairs Advisor	External and Community Affairs Manager (Communication and SEI)	CSR Expert	LM Manager (PMCI)	Social & Livelihood Expert	E&S Manager	E&S Management Social Expert	Grievance Coordinator	EPC Social Staff
Land owners / users*	E	-	-	-	-	E	A	-	-	E	E
Community members*	A	E	-	E	E	-	E	E	E	E	E
Melendugno municipality	A	E	-	-	-	-	E	-	-	-	E
National government	-	-	A	-	-	-	E	-	-	-	-
Regional, provincial, municipal government/ public authorities, institutions	A	E	-	-	-	E	E	-	-	-	E
Businesses (associations & operators)	A	-	E	E	E	-	-	E	E	E	E
Civil society/NGOs	A	E	E	E	E	-	-	E	E	E	-
Media	-	-	-	A	-	-	-	-	-	-	-

\*Including vulnerable stakeholders

<b>A</b>	ACCOUNTABLE for managing stakeholder relationship. To be informed on outcome of engagement performed by other team members.	<b>E</b>	ENGAGES with the stakeholder and informs on weekly basis the TAP accountable functional team on engagement completed and planned.
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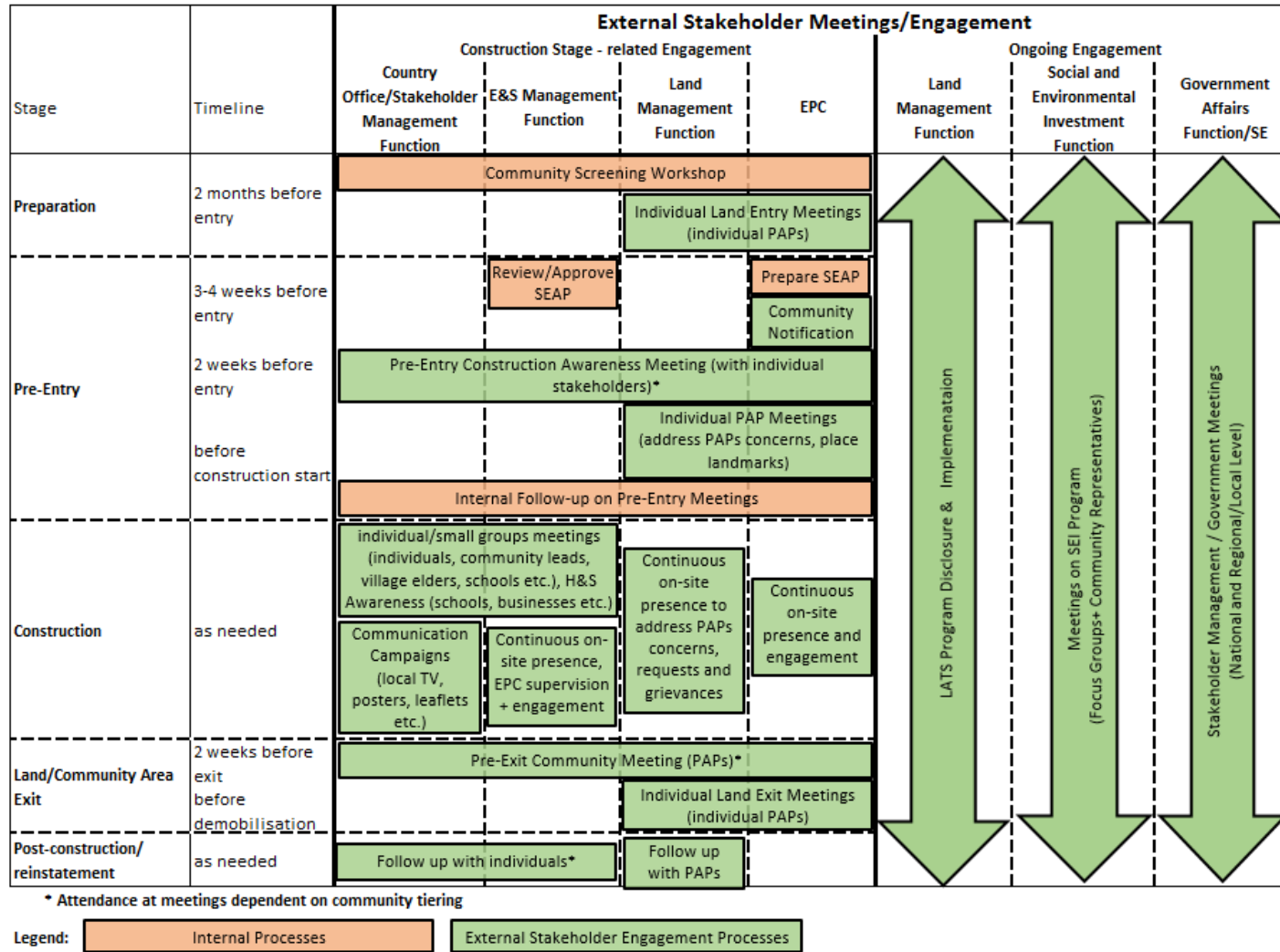
## 4.2 General Overview of TAP Stakeholder Engagement Process

TAP is implementing a structured approach to stakeholder engagement as illustrated in Figure 4.1 overleaf, which indicates the engagement responsibilities of each function of TAP's Integrated Stakeholder Engagement Team.

The TAP stakeholder engagement process includes activities performed at specific stages before, during and after construction (represented as cross-functional activities on the lines of the diagram), as well as ongoing engagement not related to a particular construction stage. The process will be updated prior to operations and considering changes in engagement requirements.

The stakeholder engagement and internal coordination processes are described in more detail in the ensuing paragraphs.

Figure 4.1: Overview of TAP Stakeholder Engagement



## 4.3 Construction Stage-related Stakeholder Engagement

TAP seeks to engage proactively with its stakeholders during all stages of construction and within each affected community.

This stakeholder engagement process is conducted by TAP in close cooperation with the EPC contractors as illustrated in figure 4.1 and further detailed in the following sections of this SEP.

### 4.3.1 Engagement during Construction Preparation Phase

#### 4.3.1.1 Community Screening

##### Process Outline

As illustrated in Figure 4.1 above, to appropriately scale and structure stakeholder engagement during the construction stages in each of the affected communities, TAP performs an initial stakeholder/community screening for distinct parts of the route, approximately two months before land entry and the start of construction works. This screening uses the integrated stakeholder and consultation database (SGMT), and is based on information from stakeholder engagement performed at earlier project stages, the grievance mechanism, the land easement and acquisition process, as well as the Community Livelihood Indicator<sup>4</sup> and associated mapping prepared in support of the LATS programme. Stakeholder vulnerability and the potential project risks and opportunities are also reviewed as part of the screening. This includes consideration of any risks identified because of the permanent media and social media monitoring performed by TAP's Communications staff which is daily internally communicated.

The Geographic Information System (GIS) platform is used to support the Community Screening process by visually representing the social sensitivity of the areas along TAP's route and by highlighting communities where particular care and attention is required as part of the engagement process. The resulting GIS-based maps consider several aspects including the number of grievances received in the past, the outcomes of previous engagement, the presence of vulnerable groups or of groups with special consultation needs, land-related sensitivities (e.g. number of PAPs with documentation issues in relation to land), and the Community Livelihood Indicator and associated mapping.

This allows identification and mapping of stakeholders in areas that may be significantly impacted, or opposed to the project. As an outcome of this screening process, the project-affected communities are classified from a

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<sup>4</sup> The Community Livelihood Indicator and associated mapping were developed to assist TAP in better understanding the stakeholders within the community and in identifying priority areas for LATS program. The Community Livelihood Indicator categorizes the economic well-being of rural communities/areas along the pipeline route based on both qualitative data (assessments from personnel who worked directly with PAPs in TAP information spots, cadastral offices and the secure land access process) and quantitative data collected by means of an anonymous questionnaire to set a socio-economic baseline. This questionnaire was completed by way of interviews with the PAPs who had agreed to be interviewed during LATS disclosure meetings.

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sensitivity perspective based on a three-tiered categorisation (Tier 1 – highly sensitive, Tier 2 – sensitive, Tier 3 – non-sensitive).

These categorisations are used to optimise the stakeholder engagement in each project-affected community. Stakeholder engagement in Tier 1 communities will be performed based on Tier 1 Engagement Plans (TEPs) that are designed to address local sensitivities in the respective communities. TEPs will outline the additional engagement and related-support that may be required in addition to the steps outlined in this SEP. Stakeholder engagement in Tier 2 communities will be performed with the participation of all stakeholder team functions, while Tier 3 community engagement will be undertaken with the involvement of those stakeholder team functions as needed at each specific project implementation stage and with consideration of the local context.

Based on TAP’s experiences in Greece and Albania, assessments additional to the ESMS and associated management plans have been completed to provide effective responses to potential residual social impacts. These assessments identify all assets and businesses in proximity to the Right of Way (RoW) and other project infrastructure potentially impacted by construction activities, assesses risks associated with those sites, and identifies cases for further assessment, engagement and mitigation, as appropriate. These assessments are designed to enable TAP to proactively manage those impacts, identify and monitor the implementation of impact mitigation measures and ensure the maintenance and, or restoration of affected livelihoods and living standards. Where appropriate, a similar assessment might be completed, suitable to the scale of construction and number of affected parcels in Italy.

#### Target Stakeholders

The Stakeholder Screening is performed in the frame of an internal workshop. No stakeholder engagement is performed at this stage.

#### Timing

The Stakeholder screening is performed at the initial stages of development of a specific KP section of the pipeline and revisited on a quarterly basis to allow for adjustments based on most recent developments and the outcome of the stakeholder engagement undertaken in the community.

#### Responsibilities for Execution

The Stakeholder Screening is carried out within a framework of a workshop led by the Country Office Stakeholder Management function with participation of all stakeholder engagement functional teams.

Tier 1 Working Groups are established for the implementation of Tier 1 Engagement Plans, with members drawn from various Integrated Stakeholder Engagement Team functions and Project Departments as required, on case-by-case basis.

### **4.3.1.2 Individual Land Entry Meetings**

#### Process Outline

Land access to the pipeline right of way (RoW) requires appropriate engagement with project-affected land owners and users to proactively address their concerns, mitigate impacts and minimise potential land entry refusals. Engagement is conducted by the TAP LM team function together with EPC contractor stakeholder engagement staff.

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This process requires careful preparation so that any questions or concerns raised by PAPs such as compensation, orphan land, reinstatement or land use restrictions can be addressed and responded to. For this purpose, an individual information package (a so-called “Parcel Passport”) is prepared in advance for each land parcel and made available to the team engaging with the project-affected land owners and users.

Approximately two months before accessing the land for construction, the TAP LM team and the EPC contractor stakeholder engagement staff meet each individual PAP in person to:

- Inform them that the land plots will be accessed to place landmarks prior to commencement of construction works.
- Solve/record any outstanding issues, requests or grievances.
- Sign Land Notification Protocols informing PAPs of the exact date when construction will start on their land plot.
- Sign Land Entry Protocols- also documenting all structures, installations and features to be reinstated to similar or better condition at finalization of construction, irrigation/drainage systems or other facilities that need to be maintained during construction, and the provision of access from one side of the parcel to the other.

#### Target Stakeholders

Targeted stakeholders of the Individual Land Entry Meetings are the project-affected land owners and users.

#### Timing

As indicated above, the individual land entry meetings with each PAP take place approximately two months before accessing the land for construction.

#### Responsibilities for Execution

The individual land entry meetings are performed by the TAP LM team in cooperation with the EPC contractor’s staff.

### **4.3.2 Engagement during Pre-Construction Phase**

#### **4.3.2.1 Pre-construction Community Notification and Construction Awareness Meetings**

##### Process Outline

As part of the stakeholder engagement process, timely notification of construction activities is provided to local communities to allow the appropriate management of construction-related disruption and rehabilitation-related expectations and issues.

The required actions to achieve this are performed by TAP in close cooperation with the EPC contractors. In accordance with the requirements of the Italy Stakeholder Engagement and Corporate Social Responsibility Contractor Control Plan (CCP), before initiating construction of a specific pipeline section or at a project site, the EPC contractor is required to prepare Stakeholder Engagement Action Plans (SEAP) describing the stakeholder engagement to be performed by the EPC contractor in relation to the respective construction activities. The SEAPs

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are subject to review and approval by TAP before work commences and inform the planning of TAP stakeholder engagement and its coordination in cooperation with the EPC contractor.

The overall engagement process is planned based on the construction works schedule, taking the provisions of the associated SEAP prepared by the EPC contractor into consideration.

Before construction reaches a community area, in line with the respective SEAP, the EPC contractor will hold a “Pre- Construction Awareness Meeting” in the respective community. The EPC Contractor holds meetings with affected individual stakeholders to confirm key activities to be undertaken, discuss sensitive areas for construction traffic safety (such as schools, hospitals, markets), outline potential employment opportunities, discuss issues of concern for the local authorities and confirm contact details. These meetings are attended by TAP’s Integrated Stakeholder Engagement Team members (primarily LM and/or CLCs/ and, or SFMs/contractor CLOs). Otherwise, the EPC contractor informs TAP of the outcome of these meetings by providing the respective MoMs.

This information will then be used to adjust the agenda of the Pre- construction Awareness Meeting. The date and location of the meeting is advertised locally by the EPC contractor through posters or by other means locally available. The relevant authorities will be notified in writing of construction works and activities.

The purpose of the meeting is to:

- Explain the upcoming construction activities in the community area and present the works schedule
- Present TAP and contractor key points of contact
- Discuss community health and safety aspects and arrangements
- Notify attendees of available employment opportunities and the associated employment process
- Remind them of the grievance process and grievance mechanism contacts
- Get stakeholders’ feedback on issues and concerns.

The intended audience for the meeting includes interested community members, representatives of local fishing and agricultural associations and local businesses, land owners and users and other interested individuals.

#### Target Stakeholders

Targeted stakeholders of the Pre- Construction Awareness Meetings include individual community members, PAPs, complainants, community leaders, local authorities, local businesses and schools.

#### Timing

Local authorities are notified approximately three to four weeks in advance of commencement of construction activities in the respective community.

The Pre- construction Awareness Meetings take place approximately two weeks in advance of the start of construction.



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### Responsibilities for Execution

In coordination with TAP, the EPC contractor representatives are responsible for notifying the relevant authorities and agreeing on the date and location with them, as well as advertising and organisation.

The Pre-construction Awareness Meeting is held by the EPC staff in cooperation with TAP Integrated Stakeholder Engagement Team function representatives (SFM, CLCs, LEA).

Meetings and engagement within Tier 1 communities are performed as defined in the Tier 1 Engagement Plans for the respective community. Meetings in Tier 2 communities are attended by team members from all Integrated Stakeholder Engagement Team functions. Tier 3 community meetings will be attended at a minimum by one TAP representative (typically an SFM and/or a CLC), in addition to the relevant EPC contractor stakeholder engagement staff.

#### **4.3.2.2 Individual PAP Meetings**

##### Process Outline

Before the start of construction, PAPs are individually pre-notified and personally met by the team in the field to place construction landmarks and accurately identify and inform on the land affected by the upcoming construction works. The outcome of this engagement is documented in pre-land entry MoM's, which are followed up by the TAP LM team.

##### Target Stakeholders

Targeted stakeholders of the Individual PAP Meetings are the project-affected land owners and users.

##### Timing

Individual pre-notification and personal meeting with each PAP to place construction landmarks take place before construction activities start.

##### Responsibilities for Execution

Individual PAP Meetings are conducted by the TAP LM team in cooperation with the EPC contractor's staff.

#### **4.3.2.3 Internal Follow-up on Pre-Construction Stage Meetings**

##### Process Outline

The outcomes of the Pre-entry Construction Awareness Meeting and the feedback received, as documented in the Minutes of Meeting (MoMs), are followed up internally and used to confirm or adjust the Tier 1 – 3 community classification, as well as to define subsequent engagement within that community during construction.

Based on the outcome of meetings and feedback received, TAP prepares an `Outreach Calendar` on a yearly and quarterly basis. This provides the planning for engagement with stakeholders along the pipeline corridor responding to stakeholder interests and needs, primarily in relation to the progress of construction and management of associated potential environmental, social and cultural heritage impacts.

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While the outreach engagement programme is designed primarily to meet these needs, it also includes engagement on other important topics such as social and environmental investment, local content, and livelihood restoration. The Outreach Calendar is adjusted according to the outcomes and feedback received from the Pre-construction Awareness and individual PAP meetings. This ensures that engagement during construction will respond to the specific needs of the respective community.

#### Target Stakeholders

The outcomes of the Pre-Construction Stage Meetings are internally followed-up by each of the Integrated Stakeholder Engagement Team functions. No stakeholder engagement is performed at this stage.

#### Timing

The follow-up on the pre-construction stage engagement is performed prior to the start of construction.

#### Responsibilities for Execution

All stakeholder engagement functional teams are responsible for following up the outcomes of the pre-entry stage meetings and for planning the engagement required in the subsequent stages.

### **4.3.3 Engagement during Construction Works Execution Phase**

#### Process Outline

A permanent presence on-site is maintained by all stakeholder engagement functional teams during construction work to ensure that stakeholders concerns and requests can be addressed.

Based on the local context community classification, engagement by the Integrated Stakeholder Engagement Team during project construction in a community area may include:

- Stakeholder engagement meetings (individuals, vulnerable stakeholders, community leads, complainants, village elders, schools, services local businesses etc.).
- Health and Safety Awareness Training (schools, local businesses)
- Communication campaigns (local TV, posters, leaflets) on upcoming construction activities, livelihood restoration, employment opportunities etc.
- Other engagement in response to stakeholder interests and needs.

Stakeholder-related activities by EPC contractors during construction include the disclosure of information and engagement concerning project impacts and changes to schedule, risks and mitigation measures (if any). This engagement addresses aspects related to environmental, community health and safety and security issues, interruption to infrastructure and utilities, land entry/exit, additional land take, EPC contractor local content (procurement and employment) as well as grievance management. Commitments in this respect have been incorporated in the Contractor Control Plans (CCPs) and in the associated ESIPs by EPC contractors. Implementation is monitored by TAP on an on-going basis.

The stakeholder engagement activities performed by EPCs are defined in Stakeholder Engagement Action Plans (SEAPs) prepared before construction of a specific KP section or project component commences, and are subject to review and approval by TAP. Emphasis is therefore placed by TAP on monitoring the stakeholder engagement

practices of EPC contractors. To this end, specific training is delivered by TAP to the contractor CLOs and ongoing close cooperation is ensured between TAP's in-country E&S management staff and contractor personnel with stakeholder engagement responsibilities.

#### Target Stakeholders

Stakeholders targeted for engagement in communities during the construction stage include individual community members, PAPs, community leaders, complainants, local authorities, local businesses and schools.

#### Timing

Stakeholder engagement is performed as needed while construction activities are underway in the respective community area.

#### Responsibilities for Execution

The Country Office/Stakeholder Management function is responsible for delivering outreach engagement in communities including stakeholder meetings and communication campaigns. The function also delivers Health and Safety Awareness trainings at schools and local businesses, in addition to similar engagement by the EPC contractor.

The E&S Management function reviews and approves the EPC contractor's SEAPs and supervises their implementation by the EPC contractor through monitoring, regular inspections and audits during construction. Engagement oversight of the EPC contractors ensures that existing and emerging issues can be identified and addressed in a timely and transparent manner.

The LM function ensures a continuous presence on site during construction works to address any PAP concerns or requests and to engage with them as necessary.

### **4.3.4 Engagement during Land/Community Area Exit Phase**

#### **4.3.5.1 Pre-exit Community Meetings**

##### Process Outline

Before construction works finish in a community, TAP will notify the local authorities and agree the details of a "Pre-exit Community Meeting", aiming for an attendance similar to the Pre-Construction Awareness Meeting.

The main scope of the Pre-exit Community Meeting is to:

- Inform the community of reinstatement, land handback, and any land use restrictions upon completion of works
- Remind attendees of the grievance process and contacts.
- Get stakeholders' feedback on any open issues and concerns, and agree how these will be addressed and closed.

### Target Stakeholders

Targeted stakeholders of these meetings include individual community members, project-affected people, community leaders, local authorities, local businesses and schools.

### Timing

The completion of construction works will be notified approximately two to three weeks in advance and the Pre-exit Community Meetings held approximately one to two weeks before construction equipment is removed from the respective community area.

### Responsibilities for Execution

The Pre-exit Community Meeting is held in cooperation with the EPC contractors and with the participation of TAP stakeholder engagement functional team representatives. Meetings and engagement in Tier 1 communities are performed as defined within the TEP for the respective community. Meetings in Tier 2 communities are typically attended by team members from all Integrated Stakeholder Engagement Team functions. Tier 3 community meetings will be attended by at least one TAP representative (primarily a LM member and/or an SFM/CLC), in addition to the relevant EPC contractor stakeholder engagement staff.

## **4.3.5.2 Individual Land Exit Meetings**

### Process Outline

Upon completion of construction and reinstatement in temporarily occupied land (pipeline construction corridor and temporary facilities), the Social and Livelihood Expert, the LEA Manager and the EPC contractors perform exit inspections with all owners/users of all land used during the construction works execution phase. If the inspection concludes that reinstatement is satisfactory, the usage right of the affected land plot will be handed back to the land owner or user for agricultural activities. Any claim arising from potentially unsatisfactory reinstatement will be managed through the grievance management mechanism. During the exit inspection, the Social and Livelihood Expert and the LEA Manager provides the landowner/user both verbally and in writing with all required information about permissible and restricted activities on the land plot, and the contact details of the team responsible for the monitoring the project during operations. The contents of the Easement Agreement signed upon entry into land is explained again to the landowner.

### Target Stakeholders

Targeted stakeholders of the Land Exit Meetings are project-affected land owners and users.

### Timing

Inspection of each affected land plot is conducted with the land owner/user upon completion of construction and reinstatement.

### Responsibilities for Execution

The Land Exit Meetings are performed by the Social and Livelihood Expert and LEA Manager in cooperation with EPC contractor staff.

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### 4.3.5 Post-Construction Phase Engagement

#### Process Outline

After the completion of construction and reinstatement works within a community area, TAP periodically meets the local authorities and community leaders to follow up any open issues associated with the project and engage with relevant parties and stakeholders to address them as needed. This engagement is aimed at closing any social issues related to construction, follow up residual concerns or grievances, and ensure that any potential land management/restoration-related issues are addressed and closed.

Follow up engagement with project-affected landowners and users including vulnerable stakeholders, is performed as part of the monitoring of the Livelihood Restoration Plan (LRP) and implementation of the LATS programme. This engagement is aimed at assessing the extent to which the livelihoods of affected households have been restored, verify that measures to restore or enhance project -affected peoples' quality of life and livelihoods are being implemented, and assess their effectiveness.

#### Target Stakeholders

The Post-Construction Phase Engagement is envisaged as following up on any issues and addressing the needs of all stakeholders within a specific area where construction works are finalised.

#### Timing

Post-construction Phase Engagement is performed as needed after construction and reinstatement works are finished. However, as this version of the SEP focuses on the construction phase of the Project, the plan will be revised before operations commence to determine the engagement that will be performed on an ongoing basis.

#### Responsibilities for Execution

The post-construction follow-up engagement with the local community leads and local authorities is performed by the Country Office/Stakeholder Management and E&S Management functions while the LM function is responsible for follow-up engagement with land owners and users.

## 4.4 Ongoing Stakeholder Engagement

In addition to construction phase related stakeholder engagement, TAP also engages with its stakeholders on an on-going basis through the implementation of the LATS and SEI programmes of the grievance management process, and by regular outreach engagement actions, that include interactions with government authorities at all levels. These stakeholder engagement processes are not related to a construction stage and are described briefly within subsequent sections of this document.

### 4.4.1 Livelihood Restoration-related Engagement

#### Process Outline

Throughout the construction phase, TAP will continue to engage with individuals and communities affected by land easement and acquisition as part of the implementation of its Livelihood Restoration Plan (LRP). This includes monitoring the execution of land entry and exit protocols by EPC contractors, overseeing any necessary

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additional land take undertaken by contractors and follow-up monitoring with PAPs to document the effectiveness of livelihoods restoration.

TAP also undertakes stakeholder engagement activities through its Livelihood Assistance and Transitional Support programme (LATS). Its goal is to ensure that those people whose land is temporarily or permanently acquired can restore their livelihoods to pre-project levels or even improve them where possible.

Several tools have been developed by TAP to support the implementation of LATS. These include a Community Livelihood Indicator, a Vulnerable Household Watch List and a Vulnerable Assessment Tool.

The Community Livelihood Indicator was developed to help TAP better understand the communities along the pipeline RoW and in identify priority areas for the LATS programme.

The Vulnerable Household Watch List identifies and helps TAP monitor those PAPs considered to be 'vulnerable'. Special measures taken by TAP for this category of stakeholders include home visits to review contracts and agreements, support with transportation to notaries/banks and meetings with extended family members to ensure there is a thorough understanding of the land access process. The Social LM Advisors also use this list to keep EPC contractors informed of vulnerable PAPs who may require extra support through the land entry and exit process.

A Vulnerable Assessment Tool was also developed to help TAP identify those PAPs who are at higher risk of experiencing negative project impacts, very poor families with limited assets who are highly dependent on the affected land parcel for their livelihood, elderly widows/widowers with failing health and limited social support who rely on the income from perennial trees and who may require transitional support and/or additional, specialised assistance.

Detailed LATS components and implementation schedules are provided in the TAP Italy LATS document.

Livelihood restoration process and LATS implementation are monitored continually. Reports on their overall progress are produced for internal purposes on a quarterly basis and summaries are made available publicly on TAP's website annually.

#### Target Stakeholders

Stakeholders targeted for Livelihood Restoration-related engagement are the project-affected land owners and users and any other stakeholders with a demonstrated loss of income source or loss or means of livelihood because of project restrictions on land use.

#### Timing

Livelihood Restoration-related engagement is performed on an ongoing basis throughout project execution.

#### Responsibilities for Execution

Implementation of the Livelihood Restoration-related engagement is the responsibility of the LM team, in cooperation with the SEI team. They identify synergies with the SEI programme and coordinate implementation with the Stakeholder Management team.

#### 4.4.2 Social and Environmental Investment (SEI) -related Engagement

##### Process Outline

The goal of the TAP SEI programme is to contribute in a sustainable and inclusive way to the improved livelihoods and quality of life within local communities in proximity to the project.

The objectives of the TAP SEI Programme are to:

- Strengthen livelihoods within local communities<sup>5</sup>
- Support improved community quality of life along the pipeline route
- Enable improved skills and abilities through support for education and training initiatives
- Enhance environmental management including through support for biodiversity.

The programme's funding framework includes grants, local community initiatives and regional development partnerships.

Implementation requires stakeholder engagement, including qualitative and quantitative data collection from communities, local, national, regional and municipal government and key development actors and NGOs. This engagement will ensure there is a clear and up-to-date understanding of community needs and that communities can contribute to the priorities for development interventions. It is hoped that communities will themselves contribute to the majority of SEI interventions, either financially or in-kind.

##### Target Stakeholders

Stakeholders targeted for the TAP SEI-related engagement include local communities, businesses, institutions and civil society organizations.

##### Timing

TAP SEI-related engagement is performed on an ongoing basis throughout project execution.

##### Responsibilities for Execution

SEI-related engagement is the responsibility of the SEI team which cooperates with the LM team to identify synergies with the Livelihood Restoration programme and coordinate implementation.

#### 4.4.3 Outreach Engagement

##### Process Outline

The goal of TAP's Outreach Engagement programme is to maintain open communication channels with a range of stakeholders to listen to their views, issues and concerns in relation to project activities and, based on this

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<sup>5</sup> Note: The SEI Programme focuses on livelihoods as one of the priority development needs identified through baseline analysis and stakeholder consultation. The Programme goes above and beyond impact mitigation both in terms of the target beneficiaries and the intended outcomes. The LATs Programme has a more limited and specific focus, i.e. the restoration of livelihoods to at least pre-Project conditions for those impacted by the Project.

engagement, to adopt corrective actions where appropriate. Achieving this goal requires a regular presence in communities and engagement with a broad range of stakeholders as part of an engagement calendar or because of ad hoc information requests. Other interactions may be unplanned; responding to questions and issues raised during field trips or visits to TAP offices.

#### Target Stakeholders

Engagement activities target a broad range of stakeholders, including communities and other identified stakeholders present at a local level. These may include local government, NGOs/civil society, public authorities, local businesses and operators and agricultural institutions.

#### Timing

TAP outreach engagement is performed on an on-going basis throughout project execution and into operations.

#### Responsibilities for Execution

The Stakeholder Management function is responsible for outreach engagement. They are supported by other stakeholder-facing functions to ensure the consistent communication of key messages.

### **4.4.4 Government Affairs-related Engagement**

#### Process Outline

TAP's Government Affairs engagement seeks to mitigate risk and monitor and manage arising issues that could potentially affect the projects reputation and hinder its ability to secure key permits for construction. TAP's Government Affairs engagement aims to protect and maintain the project's reputation by promoting messages that are related specifically to the project and the benefits it brings, using targeted communications activities and campaigns.

In addition, TAP's Government Affairs engagement includes regular briefings provided to relevant diplomatic missions in Rome on matters related to the project.

#### Target Stakeholders

Stakeholders targeted for TAP Government Affairs-related engagement are national, regional and municipal government agencies and civil society organisations.

#### Timing

TAP Government Affairs-related engagement is performed on an ongoing basis throughout project execution, led by the Country Manager.

#### Responsibilities for Execution

The implementation of TAP Government Affairs-related engagement is the responsibility of the Government Affairs team.



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## 5. Grievance Mechanism

### 5.1 Introduction

This section provides a summary of TAP's Third Party Grievance Mechanism. Full details are set out in TAP's Grievance Management Framework (CPL00-PMT-601-Y-TVO-0001)), TAP's Italy Third Party Grievance Procedure (Italy Grievance Procedure (Italy Grievance Procedure (CPL00-PMT-601-Y-TPG-0001)), and the EPC Contractors' Third Party Grievance Procedures.

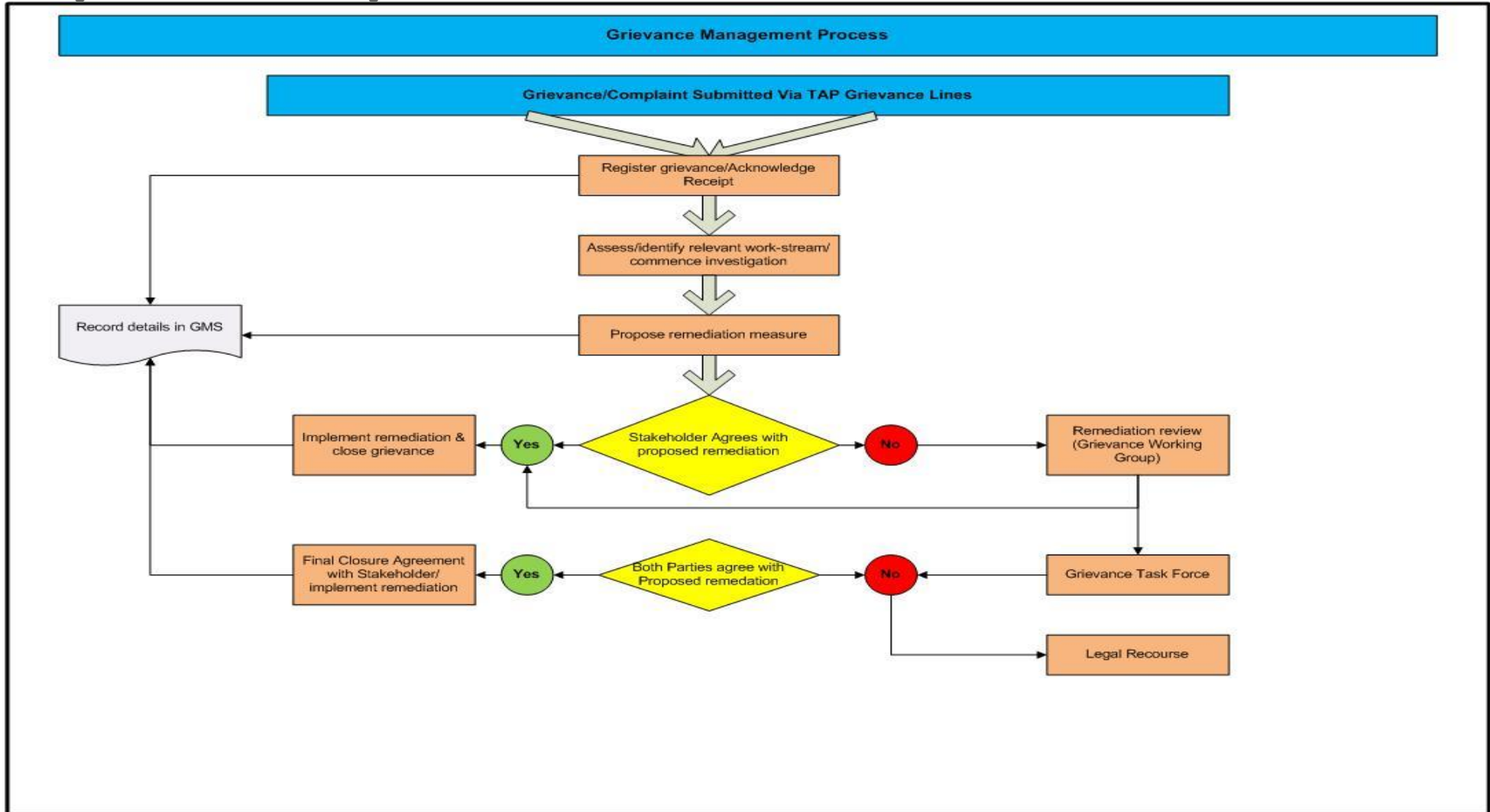
The corporate GMF outlines the principles of grievance management and defines the organisational structure and processes required to implement a functional, effective and culturally appropriate grievance mechanism that is responsive to stakeholder needs. It is supported by the Italy Third Party Grievance Procedure, which aims to address, manage and resolve stakeholder grievances, concerns, complaints and LM requests related to TAP construction activities and to ensure that TAP is aware of, and responds to, stakeholder concerns. Both the GMF and the Italy Grievance Procedure are continuously updated to ensure the grievance management process remains relevant, accessible and effective.

TAP communicated its pre-construction Grievance Mechanism to stakeholders during the EIA consultation phase and throughout LM-related activities. TAP's Grievance Mechanism was then revised for the construction phase and made available through all identified channels that are accessible to local stakeholders. The grievance mechanism is communicated in a format and language readily understandable to the local population. To ensure that all stakeholders are aware of how to submit grievances, TAP has also created additional grievance communication materials such as posters and pamphlets, as well as an engagement plan for the Grievance and Information Hotline. These materials are distributed at the TAP regional office and Info Point.

### 5.2 Grievance Management Process

TAP's Grievance Management Process is illustrated in Figure 5.1 overleaf.

Figure 5.1: TAP Grievance Management Process



The following timeframes apply in the implemented grievance administrative process.

**Table 5.1: Applicable timeframes in Grievance Administrative Process**

Action	Timeframe
Register grievance in database	Within 7 working days
Acknowledge Grievance	Within 7 working days
Issue grievance rejection letter (if required)	Within 30 days
Issue grievance feedback explaining time required for resolution and on-going progress (if not yet resolved)	After 30 days
Issue grievance feedback (when mitigation established)	30/60/90 days (see case and severity levels)
Issue compensation payments	30 days after signing agreement

The grievance management process is described in detail in the TAP Italy Grievance Procedure on TAP's website. Grievance forms are also available from the TAP website, from TAP in-country personnel and its contractors and from the TAP project offices. Grievances can also be submitted directly through the TAP website. EPC contractor GMs are available from the contractors directly. Any grievances submitted in these GM's are recorded in the TAP SGMT.

All incoming grievances are recorded, tracked and managed in the SGMT by the in-country Grievance Coordinator. This allows an on-going information flow, enabling the project to understand and monitor its impact over the course of implementation. Any requests for information captured in the grievance process will be sent to the affected TAP work-stream or the relevant EPC contractor, to be addressed.

The TAP grievance team periodically reviews the grievance management process to eliminate systemic problems and to ensure that the resolution process is working efficiently and delivering effective outcomes. TAP staff and contractors receive continual grievance training, including training in using the SGMT tool. The in-country Grievance Coordinator monitors compliance against relevant commitments using the grievance monitoring and verification forms.

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## 6. Stakeholder Engagement Coordination and Monitoring

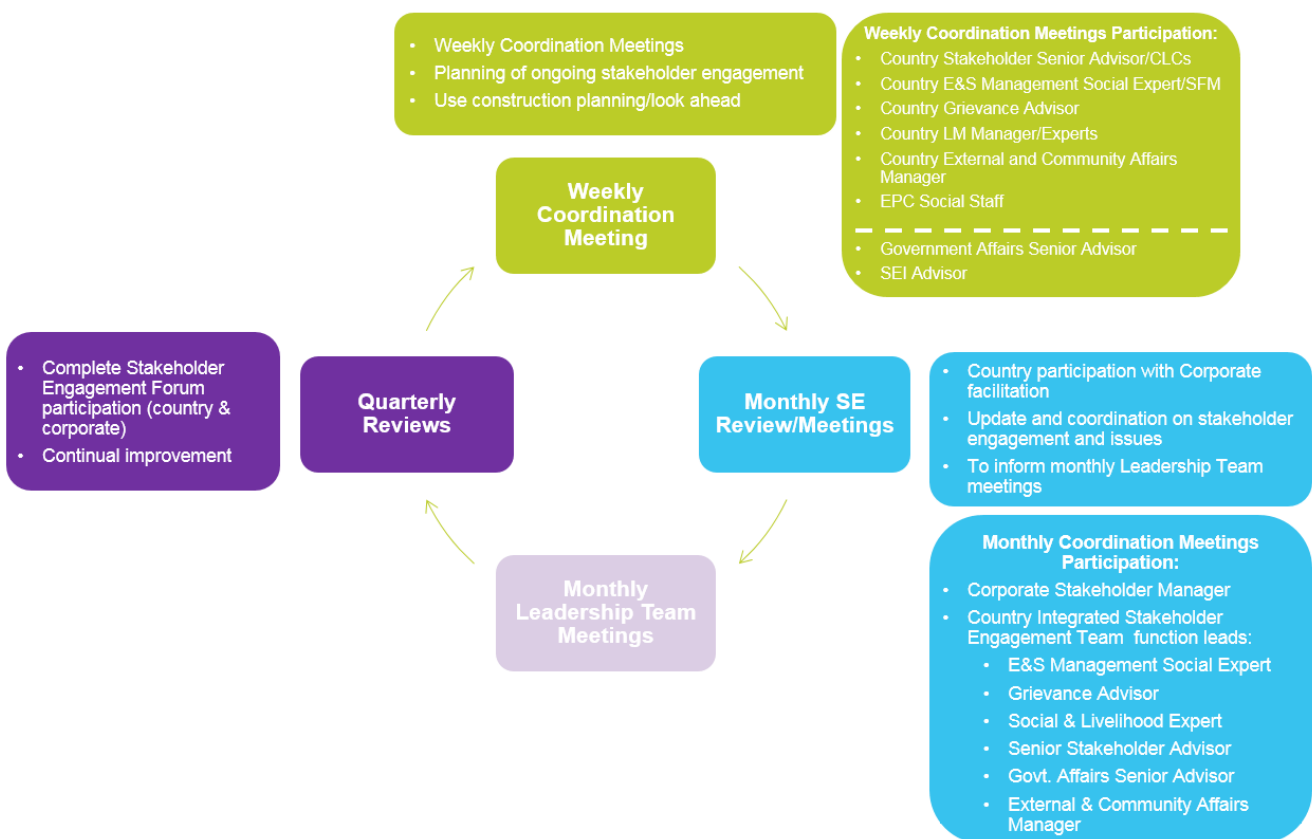
### 6.1 Internal Coordination and Monitoring

TAP has set up a process aimed at ensuring ongoing coordination and monitoring of the effectiveness of its stakeholder engagement processes and those of its EPC contractors.

The Integrated Stakeholder Engagement Team members and the EPC contractor participate in regular coordination meetings as illustrated in figure 6.1 below.

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**Figure 6.1: Stakeholder Engagement – Coordination Meetings**



Weekly coordination and monitoring meetings take place in the field at the EPC contractor facilities. These meetings are attended by the EPC contractor social staff and TAP stakeholder engagement team members from the E&S Management (Social Expert, Grievance Coordinator, E&S Manager), LM (Social and Livelihood Expert and LEA Manager) and Country Office Stakeholder Management (Senior Stakeholder Advisor, CLC) functions and the EPC contractor (CLOs). Should specific situations or issues need to be addressed with additional inputs, the SEI and Government Affairs team units' representatives also participate as needed, either in person or remotely via teleconference.

Aspects addressed during these meetings include ongoing stakeholder engagement topics, closure of actions/issues from the previous week, operational issues, construction-related aspects including community health and safety, engagement planning for the upcoming week and further based on the construction schedule look-ahead, grievances received and aspects of grievance management. The E&S Management function oversees organising the weekly coordination meetings.

Monthly, the country stakeholder engagement functional leads (Senior Stakeholder Engagement Advisor, E&S Management Social Expert, Grievance Coordinator, Social and Livelihood Expert, CSR Specialist, External Affairs and Communities Manager, Community Liaison Coordinator) participate in a Stakeholder Engagement Review

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Meeting by country, co-ordinated and facilitated by the Corporate Stakeholder Manager. These monthly stakeholder engagement meetings are held via teleconference and are aimed at reviewing the foregoing month's engagement process and coordination between in-country and corporate-level teams and looking ahead to the next monthly phase of stakeholder engagement.

The monthly stakeholder engagement review meetings take place in advance of the monthly TAP Leadership Team Meetings allowing the provision of updates to the TAP management on the key aspects of stakeholder engagement.

TAP conducts quarterly reviews of the performance and risks associated with the stakeholder engagement. These quarterly reviews are part of TAP's continual improvement process and take place with similar participation to the monthly review meetings.

The Corporate Stakeholder Manager oversees organising the Monthly Stakeholder Engagement Review Meetings and the Quarterly Risk/Performance Reviews

Contractors report to TAP on a monthly basis on stakeholder engagement performed.

## 6.2 Key Performance Indicators (KPIs)

Examples of key performance indicators (KPIs) used by TAP for evaluating the effectiveness of stakeholder engagement activities and analysis of trends are provided in Table 6.1 overleaf.

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**Table 6.1: KPIs**

<b>Outreach</b>	<b>Actual</b>	<b>Planned</b>	<b>%</b>
Number of outreach sessions/meetings conducted			
HSE community training sessions conducted			
% of participation in pre- entry/pre-exit construction awareness meeting			
Planned number of participants in outreach sessions			
<b>Visits</b>	<b>Actual</b>	<b>Planned</b>	<b>%</b>
Number of visits and visitors received in TAP offices			
Gender of visitors to TAP offices			
Number of requests for information responded to within 3 working days			
Number of MoMs entered SGMT			
<b>Issues/Commitments</b>	<b>Actual</b>	<b>Planned</b>	<b>%</b>
Number of informal meetings			
Number of issues raised (during office visits and outreach sessions), vs. issues addressed and issues outstanding.			
Number of commitments received and delivered within the timeframe (this is for commitments made during stakeholder engagement meetings)			
<b>E&amp;S Management</b>	<b>Actual</b>	<b>Planned</b>	<b>%</b>
Total number of social incidents			
Social incidents (category 3/4/5) *			
Social incidents (category 1/2) *			
Number of social incidents by type (land related, non-land related, industrial action)			
Number of stakeholder meetings/community awareness sessions			
Employees from local project affected communities			
Employees from host countries			
Euro spend on goods and services in host country			
<b>Grievance</b>	<b>Actual</b>	<b>Planned</b>	<b>%</b>
Efficiency: total number of grievances received and resolved, number of grievance resolved according to prescribed timeframes, median days to closure			
Effectiveness: total number of grievances received by region, number of grievances by work-stream, number of grievances by category, number for recurring grievances;			
Awareness: number of grievance training sessions completed by TAP and contractors; areas provided with grievance communication; recorded number of grievances using recourse mechanisms and number of hot topics escalated from assessment of overall grievance and stakeholder information.			

\*Ref TAP-HSE-PR0011

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## 7. Change Management

### 7.1 Annual SEP Review

In accordance with TAP's Commitment Register (GAL00-PMT-601-Y-TLX-0001), the Stakeholder Engagement Plan will be reviewed on an annual basis and updated to consider the results of the review. The Corporate Stakeholder Manager will be responsible for facilitating this review in collaboration with the in-country stakeholder-facing functions, and incorporating any agreed changes.

### 7.2 Operations Readiness

Before TAP enters its operations phase, the Stakeholder Engagement Plan will be updated to consider the following:

- Resources required by different stakeholder-facing functions during operations
- Review of stakeholder mapping, tailored to the operations phase and engagement requirements
- Operations plans for other stakeholder-facing functions (Stakeholder Management, SEI, Livelihood Restoration, Environmental and Social, Grievance Management)
- Residual grievances carried over from the construction phase and requiring ongoing monitoring.

TAP's Commitment Register (GAL00-PMT-601-Y-TLX-0001) specifies that the Stakeholder Engagement Plan for Operations will be finalised six months before the start of operations and will be shared with key stakeholders.



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## 8. Sources of Information

### 8.1 TAP Website

A wide range of information relating to is the project available on the TAP website. In terms of stakeholder engagement, the following sections are of particular interest:

Website Section	Link
ESIA Italy	<a href="https://www.tap-ag.it/il-nostro-impegno/per-lambiente/esia-italia">https://www.tap-ag.it/il-nostro-impegno/per-lambiente/esia-italia</a>
Corporate Social Responsibility - Italy	<ul style="list-style-type: none"> <li>• <a href="https://www.tap-ag.it/chi-siamo/la-responsabilita-sociale-dimpresa">https://www.tap-ag.it/chi-siamo/la-responsabilita-sociale-dimpresa</a></li> <li>• <a href="https://www.tap-ag.it/il-nostro-impegno/per-la-collettivita">https://www.tap-ag.it/il-nostro-impegno/per-la-collettivita</a></li> <li>• <a href="https://www.tap-ag.it/il-nostro-impegno/per-il-futuro">https://www.tap-ag.it/il-nostro-impegno/per-il-futuro</a></li> <li>• <a href="https://www.tap-ag.it/il-nostro-impegno/per-la-collettivita/come-operiamo">https://www.tap-ag.it/il-nostro-impegno/per-la-collettivita/come-operiamo</a></li> </ul> <p>Info on dedicated SEI projects:</p> <ul style="list-style-type: none"> <li>• <a href="http://www.tapstart.it/">http://www.tapstart.it/</a></li> <li>• <a href="http://mena-mastertap.it/">http://mena-mastertap.it/</a></li> </ul>
Land Access Summary - Italy	<a href="https://www.tap-ag.it/assets/03.land_access/italian/LEA%20Italy%20A4_May%202015.pdf">https://www.tap-ag.it/assets/03.land_access/italian/LEA%20Italy%20A4_May%202015.pdf</a>
Guide on Land Easement and Acquisition - Italy	<a href="https://www.tap-ag.it/laccesso-ai-fondi/i-criteri-delle-indennita">https://www.tap-ag.it/laccesso-ai-fondi/i-criteri-delle-indennita</a>
Livelihood Assistance and Transitional Support - Italy	<a href="https://www.tap-ag.it/assets/03.land_access/italian/LATS_Italy_Short_Brochure_IT.pdf">https://www.tap-ag.it/assets/03.land_access/italian/LATS_Italy_Short_Brochure_IT.pdf</a>
Health and Safety Policy	<a href="https://www.tap-ag.it/assets/07.reference_documents/italian/hse/150811_TAP%20Project%20HSSE%20Policy%20(Italian).pdf">https://www.tap-ag.it/assets/07.reference_documents/italian/hse/150811_TAP%20Project%20HSSE%20Policy%20(Italian).pdf</a>
Grievance Mechanism	<a href="https://www.tap-ag.it/reclami">https://www.tap-ag.it/reclami</a>

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## 8.2 Newsletters/Leaflets/Posters

Leaflets covering health and safety topics were distributed door-to-door to Melendugno citizens in 2014. Grievance and LATS leaflets, brochures on SEI programmes and on the main topics related to the project (health/safety/environment/tourism/benefits) are available in Italian at the TAP Info point in Melendugno and at TAP office in Lecce. A hard copy of the ESIA in Italian is held at the TAP Lecce office. Via Templari 11 73100 Lecce, Italy Phone: +39 0832 249 721 [tapitalia@tap-ag.com](mailto:tapitalia@tap-ag.com)

## 8.3 Media Campaigns

“TAP Italia’s” official Facebook page is a proactive means of communication that provides information and updates on the project and it’s on-field activities. The page is updated daily and questions and comments are addressed in real time. The page can count 19,500 ‘likes’ and the latest updated video (<https://www.facebook.com/TAPItalia/?fref=ts>) received 247,000 views.

Media campaigns are regularly organised to promote SEI programmes and activities, to increase the number of followers and reach possible beneficiaries.

Activities on traditional media (adverts on newspapers/TV spots/web banners/billposting) on the same topics (launch of SEI programmes/information on main aspects of the project) are also conducted.

## 8.4 Info Point

In October 2015 TAP Italy opened an information point at Via Mozart n.9, 73026 Melendugno. The Info Point is in a very busy central position and serves as a direct and friendly communication channel between TAP and the local community.

The Info Point is open 8 hours a day from Monday to Friday, provides communication materials, posters and brochures and a monitor has been installed against the shop window, projecting videos, photos and presentations on TAP project. It is staffed by a receptionist and by TAP personnel, as needed.

TAP has also established a toll free number for anyone to raise questions or seek information from TAP.