



Trans Adriatic
Pipeline



Stakeholder Engagement Strategy

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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
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
MoM	Minutes of Meeting
NGO	Non-Governmental Organisation
OECD	Organisation for Economic Co-operation and Development
PAPs	Project Affected People
PR	Performance Requirement
RoW	Right of Way
RSIP	Route Social Impact Plan
SEAP	Stakeholder Engagement Action Plan
SEI	Social and Environmental Investment
SEP	Stakeholder Engagement Plan
SFM	TAP Social Field Monitor
SGMT	Stakeholder and Grievance Management Tool
SIMP	Social Impact Management Plan
SLA	Secure Land Access
TAP	Trans Adriatic Pipeline
TEP	Tier 1 Engagement Plan

1. Introduction

1.1 Purpose and Objectives

The Trans Adriatic Pipeline (TAP) will transport Caspian natural gas to Europe. Connecting with the Trans Anatolian Pipeline (TANAP) at the Greek-Turkish border, TAP will cross Northern Greece, Albania and the Adriatic Sea before coming ashore in Southern Italy to connect to the Italian natural gas network.

The project is currently in its construction phase, which started in 2016.

TAP considers Stakeholder Engagement (SE) to be a central element of the environmental and social (E&S) performance of the project and an essential component of good business practices and corporate citizenship.

TAP understands the issues associated with poor stakeholder relations and the opportunities provided by constructive engagement. In particular TAP acknowledges:

- SE is a risk management tool as it allows early and effective identification, assessment and management of risks.
- SE is key to obtaining and maintaining broad stakeholder support for the project as the views, concerns and interests of stakeholders are being heard, understood and taken into account in its design and execution.

The Stakeholder Engagement Strategy (SES) is the overarching framework for all SE-related activities in TAP's three operating countries: Greece, Albania and Italy.

Areas outside the scope of the present strategy document are:

- Engagement activities with the European Union (EU).
- Engagement activities linked with permitting (except public consultations undertaken as part of the ESIA and ESIA amendments, and related disclosure of information).

The SES is a live document and is updated as needed to reflect the current project phases. This issue of the SES focuses on stakeholder engagement associated with the construction phase.

Individual Stakeholder Engagement Plans (SEPs) are developed to guide engagement efforts in each country. The SEPs are aligned with the SES and have been revised for the current construction phase.

The overall purpose of the SES is to describe the scope and direction of TAP's SE activities during construction and commissioning and how the project's various functions achieve its SE objectives.

The specific objectives of the SES are to:

- Provide an outline of planned stakeholder engagement during the construction phase, in line with project standards, that guides the formulation of country-specific stakeholder engagement plans (SEPs) and indicates how the plans will be updated in preparation for operations.

- Ensure regular, accessible and transparent consultation with stakeholders.
- Provide the framework for development of constructive, long-term relationships, based on dialogue and communication, that are aimed at attaining broad support for the project in 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 SES, including procedures to carry out the country-level SEPs.

1.2 Applicable Standards and Guidelines

TAP is committed to compliance with the European Bank for Reconstruction and Development's Performance Requirements (EBRD PR), revised in 2014. PR 10 (Information Disclosure and Stakeholder Engagement) outlines a systematic approach to SE that helps EBRD clients build and maintain a constructive relationship with their stakeholders, particularly locally affected communities. The process of SE is an essential component of the appraisal, management and monitoring of E&S issues associated with a project. EBRD therefore stresses that PR 10 should be read in conjunction with PR 1 (Assessment and Management of Environmental and Social Impacts and Issues).

Other applicable standards include:

- European Investment Bank (EIB) E&S Standards, 2013
- Equator Principles III, 2013 (EPIII)
- IFC Performance Standards, 2012 (IFC PS)
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, 2011.

1.3 Articulation with TAP Management System Documentation

The SE Strategy interfaces with a number of other TAP Management System (MS) documents, listed below:

Document Level:	Corporate	Country-Specific
Policy	Code of Conduct	
	Engagement with Government and Public Officials Policy	
	Corporate Social Responsibility (CSR) Policy	
	Health, Safety, Security and Environment (HSSE) Policy	
	Security Policy	
Strategy	Public Affairs Strategy	
	Social & Environmental Investment (SEI) Strategy	

Document Level:	Corporate	Country-Specific
Framework	Livelihood Restoration Framework Grievance Management Framework	
Plans	Security Plan	Stakeholder Engagement Plans (SEPs) Contractor Control Plans (CCPs) Livelihood Restoration Plans (LRPs) Emergency Response Plans
Procedure		Third Party & Worker Grievance Procedure
Other Documents	Integrated Project Management Team (IPMT) Risk Register	ESIA Commitments Registers Country Office / IPMT Accountability & Interface Framework (Briefing Note)

1.4 TAP Engagement Commitments

TAP is committed to the following specific actions:

- Promoting meaningful engagement.
- Ensuring the contents and actions covered in the SES and SEPs are understood by all stakeholder engagement functions, 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 stakeholders on social, environmental, safety, security and other relevant issues through regular, free, prior and informed consultations.
- Disclosing relevant project information to 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 are taken into account:

- 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 or projects will bring and why?

TAP stakeholders identified by this process belong to one of the following groups:

- **Directly affected population:** this includes all owners and users of land and other resources affected by project land access.
- **Project affected communities:** this includes residents of communities in the project area of influence¹.
- **Vulnerable groups:** stakeholders directly or indirectly affected by project land access 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, elderly/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 governments:** relevant government ministries, state agencies, parliamentary committees, and regulators in TAP's three operating countries.
- **Regional and municipal government:** all decentralised government structures affected by the project in those three countries.
- **Public authorities:** education, health, hospitals, civil protection, ports.
- **Local businesses and operators, agricultural institutions/associations**
- **NGOs, civil society:** national and international NGOs and associations.
- **Media:** TAP has attracted considerable national, regional and local media attention and communicates with journalists regularly.

¹ Communities within the area impacted (directly and indirectly) by the project including the supporting facilities operated by EPC contractors.

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In early 2016, TAP revised 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.

The SGMT:

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

The SGMT also prioritises stakeholders and tracks issues through to closure. It is used to systematically document detailed information on stakeholders and record engagement sessions/meetings and outcomes based on information fed into the database. Data entered by contractors is reviewed by TAP's in-country social experts.

2.2 Stakeholder Analysis, Mapping and Prioritisation

To define stakeholder relationships, their vulnerability, importance to TAP and influence on the project's activities, stakeholders are assessed and mapped according to influence, interest and degree of potential impact. The objective of these stakeholder mapping exercises is to improve the efficiency and effectiveness of proactive and reactive engagement and to identify any potential risks and issues that TAP may face. This approach helps the project understand stakeholder interfaces and issues, set priorities and decide on specific techniques for achieving effective stakeholder participation.

After prioritising, the information is used to determine the degree to which TAP interacts with each stakeholder and the amount of effort required to work with them on a continuing basis.

TAP recognises that there is an ongoing need to maintain and update the list of individual stakeholders and their priority to inform its interactions with them as the project proceeds through its various phases. In doing so, TAP is committed to respecting people's privacy and the confidentiality of personal data.

The mapping outputs are being transferred into the SGMT (described above). The stakeholder information in the tool's database allows generation of stakeholder maps that, by using specific criteria and filters (e.g. type of stakeholders, geographic criteria, etc.), can be customised to address particular analysis and engagement needs.

Stakeholder mapping will be reviewed and updated on a quarterly basis. As part of this process, the automated SGMT-produced mapping is also verified on the ground by the stakeholder-facing functions to ensure it reflects up-to-date relationship dynamics and spheres of influence.

3. Stakeholder Engagement to Date

3.1 Introduction

TAP has been engaging stakeholders since 2008 through structured, ongoing dialogue, both proactively and as required by law and project standards.

TAP has used a variety of methods to communicate with stakeholders. At different stages of the project these have included:

- Project offices (e.g. information spots, community liaison offices)
- Info points and public displays
- One-to-one and small group meetings, in particular with government officials
- Community/public meetings
- Brochures and posters
- TAP website
- Newspaper advertisements
- Social media (e.g. text messaging, blogs)
- Electronic media (radio & TV)
- Digital media (e.g. e-newspaper banners).

3.2 Environmental & Social Impact Assessment-related Engagement

Stakeholder engagement during the Environmental and Social Impact Assessment (ESIA) was completed in five phases to ensure that a consistent, comprehensive, coordinated and culturally appropriate approach was taken for consultation and project disclosure. These phases were:

- Pre-scoping
- Route refinement
- Scoping
- Main ESIA phase
- ESIA finalisation and disclosure.

In Greece, the pipeline route was divided into East and West sections. For both sections, a Stakeholder Engagement Plan (SEP) was developed to structure and guide engagement throughout the ESIA process. SE occurred during each ESIA phase. The most intensive period of activity was during the main ESIA phase. Table 1 in Appendix 2 summarises of that document the engagement that took place during that period for the Greece East and West sections.

In Albania, a Stakeholder Engagement Plan was also prepared covering the five ESIA phases (TAP- FEED-AL-EIA-REP-7009). Table 2 in Appendix 2 of that document summarises the engagement activities that took place.

In Italy, SE for the Environmental and Social Impact Assessment followed a slightly different process:

1. Pre-scoping

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2. Route refinement
3. Scoping
4. ESIA engagement activities on alternative 0
5. Optimisation of alternative 0 and new round of engagement
6. Disclosure of final ESIA report.

The process differed from that followed in Greece and Albania due to feedback received from stakeholders on the 'alternative 0' route proposed as part of the initial ESIA submission. As a result, TAP requested three consecutive suspensions of the ESIA process during 2012 to allow for technical changes to the project. Between October 2012 and July 2013, TAP conducted 167 meetings with national, regional and local stakeholders. The majority of meetings took place with local political and technical institutions. However, engagement sessions also took place with economic operators, business representatives and local Non-Governmental Organisations (NGOs). Engagement with local communities took place through participation in local markets, letters to citizens, socio-economic surveys, perception surveys, and focus groups.

3.3 Land Easement & Acquisition-related Engagement

3.3.1 Greece

Early in the project, Cadastral Survey Offices (CSOs) were established in 25 locations along the pipeline route, including one each in Athens and Thessaloniki. To ensure public accessibility and accommodate the needs of vulnerable groups within the project-affected population, more than 130 information spots were created at key locations within the affected communities and operated for three to seven months (late 2013 to early 2014), depending on the area. Staff for the CSOs and information spots were hired locally and trained in appropriate engagement methods and details of the TAP project and Land Easement and Acquisition (LEA) activities. The main purpose of the information points was to make project-related information publicly accessible and to encourage potentially affected landowners and users to register their contact details with TAP, submit necessary property documentation and verify existing cadastral information related to their property.

As part of the process of declaring and verifying the land rights of owners and users in the project-affected areas, numerous public display processes were organised at the cadastral offices and information spots between 2013 and 2015:

- Three public display process periods for 21 CSOs.
- Two public display process periods for four CSOs in Kavala, Kalmadaki, Serres, Emmanouil Pappa.
- Two public display process periods at the Pepsos CSO.

Outreach related to the public display process included placing more than 2,500 posters in municipal offices and local communities along the pipeline route, 500 newspaper advertisements, 160 radio spots and 350 web banners in e-newspapers to ensure there was widespread awareness of the project. It is estimated that during the cadastral process contact was made with close to 50,000 people with an interest in the project.

The CSOs along the pipeline route were operated until the end of 2015. Stakeholders were encouraged to visit any of the offices to review their file and ask questions or lodge concerns about the pipeline routing, compensation process or the project generally. All project-related brochures and documents, including grievance forms, were available in these offices in the Greek language.

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In 2015, a comprehensive data collection and asset verification exercise was undertaken with Project-Affected Persons (PAPs) in all of the project-affected areas, i.e. more than 12,000 visits to over 10,000 affected plots, and more than 12,200 meetings with individual land owners and users. Temporary call centres and local field offices were established to schedule individual meetings with each PAP to collect basic demographic data, solicit perceptions of the project and to review and where necessary update the asset inventory of each affected land parcel. More detailed socio-economic data was also collected from a random sample of 1,500 project-affected households to assist the establishment of a baseline for future monitoring and to inform the design of possible livelihood restoration support programmes.

Following the Study of Compensation Values in all areas along the pipeline route undertaken in 2014, a Guide to Land Acquisition and Compensation (GLAC) was prepared.² During the census and asset verification process, a copy was distributed to each Project-Affected Person. Copies were also available in each CSO and in the local municipal office and posted on the TAP website. A further 2,720 condensed versions of the GLAC tailored to specific municipalities were circulated to local government offices.

In disclosing and verifying compensation values and entitlements, TAP organised a series of small group meetings with government officials at all levels, followed by open stakeholder meetings with Project-Affected People (PAPs) and interested parties in each of the municipalities. Significant effort was made to ensure PAPs were made aware of the meetings using local media, letters of invitation, text messages and posters. TAP also made efforts to identify and differentially engage with vulnerable groups and ensured there were male and female representatives in the survey and Secure Land Access (SLA) teams. Meetings were conducted in the homes or location of the particular stakeholder's choice. Where necessary, TAP arranged for the presence of a trusted relative or friend if needed to make the stakeholders feel more comfortable. Stakeholders were informed of the purpose, process and timetable for the census, asset verification and socio-economic survey. In total some three to four meetings per landowner were carried out to agree on land values and to make an offer, i.e. more than 33,000 meetings with over 12,000 individual landowners and land users.

In all, close to 200 government officials participated in the compensation values disclosure meetings, and more than 3,750 people attended the 36 open stakeholder meetings held between December 2014 and June 2015. Five CSOs are still in service and will remain open during the construction phase.

TAP and its LEA contractors also made significant efforts to engage with and support the vulnerable members of the project-affected population. This included more than 3,000 home visits to accommodate elderly and/or disabled PAPs who are less mobile and approximately 2,000 additional meetings conducted at the request of PAPs, with family members and friends present to ensure full understanding of the project, its requirements and implications. This level of support continued to be provided throughout the LEA letter of intent, contract signing and compensation payment process.

3.3.2 Albania

There are six Immovable Property Registration Offices (IPROs) located in Devoll, Skrapar, Fier, Korça, Berat, and Lushnje with additional professional staff supported by TAP to assist PAPs with compiling and verifying property documentation and land registration. The IPROs also publicly display cadastral information and project routing maps. As part of updating the cadastral data, close to 50 public display processes were organised throughout 2014-15 in 10 public display offices near the access road areas and at 31 IPROs along the pipeline route.

² TAP, Guide to Land Easement and Acquisition

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A variety of brochures, posters and leaflets, including the Guide to Land Acquisition and Compensation (GLAC), have been developed and distributed to each PAP and other key stakeholders. All printed material is available in both Albanian and English at TAP offices and includes:

- Guide to Land Acquisition and Compensation: 8,000 copies have been distributed and a copy posted on the TAP website.
- Notification poster for the start of the Census and Asset Inventory (C&AI) and cut-off date.
- Notification poster on property verification.
- Notification poster on disclosure of compensation values (for both draft and final version).
- Notification poster on the start of access roads construction works.
- Grievance leaflet distributed to each PAP.

Engagement with people affected by the construction and upgrading of the access roads included meetings with affected community members and local authorities in each of the 21 affected Local Government Units (LGUs).

As part of the preparation for the census and asset inventory, stakeholders from the 31 communes and municipalities, including the Head of Communes, were contacted and a letter from the Project Director of TAP distributed during the first visit to the areas, explaining the aim of the census and requesting the support of the Head of Communes, the LGU agronomist and the Head of Village in the exercise.

In 2014, TAP conducted three high-level meetings involving 30 representatives from national authorities (Ministry of Energy and Industry, Ministry of Agriculture, Rural Development and Water Resources, and the Ministry of Environment) to disclose and gather feedback on compensation values. This was followed by 21 meetings with local authorities (Korça, Berat and Fieri regional and prefecture authorities) and PAPs, involving close to 400 participants.

Two posters and two sets of tables presenting the compensation values were placed in 106 affected villages along the pipeline corridor, where feedback and written comments were encouraged. A total of 150 stakeholders submitted comments on the values, 70% of which were in favour of the disclosed values.

After the opinions and inputs of national, regional and local authorities and PAPs were taken into consideration, some minor adjustments to the values were made. The final values were then presented to the affected communities through posters in each affected village, and also in the GLAC.

3.3.3 Italy

TAP performed extensive engagements with landowners and users via the LEA process from the earliest stages of planning. During the LEA process TAP carried out extensive research and interviews to identify the land owners and users of the affected parcels. In July 2015, a letter was sent to all potentially affected landowners as a first step in the engagement with these stakeholders. The letter stated that the recipients were affected by the pipeline route and related infrastructure and were informed of TAP's intention to discuss the land easement and acquisition process, also providing TAP's contact details to be used for receiving 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 with the landowners the affected land

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assets and the ownership/lease land titles. This was then followed by a second meeting to discuss the economic proposal and 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 particular attention and special accommodations given to those PAPs considered vulnerable. Throughout this engagement process preference was given to smaller gatherings and one-on-one meetings to allow for more in-depth conversation than at a large forum to fully respect privacy concerns of the stakeholders involved. Through this process of engagement, TAP was able to undertake over 220 meetings with individual PAPs, 1.5 meetings per affected landowner on average.

Having obtained all required land rights, TAP will continue engaging with land owners and users. Any additional land take requirements will be conducted by the PMCI in accordance with TAP principles and processes in coordination with TAP. In any case TAP remains accountable for stakeholder engagement with any new land owners and users.

3.4 Social and Environmental Investment (SEI)-related Engagement

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

TAP's SEI strategy explicitly seeks to align SEI with communities, civil society and government, to create shared value and to build relationships to support construction of the pipeline. TAP SEI is delivered using a number of principles including 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, TAP performed a needs assessment in 2015 which included engagement with a broad range of local and regional community stakeholders to ensure that the SEI initiatives are grounded in community needs and priorities. The needs assessment also included engagement with regional and local authorities.

3.5 Local Content-related Engagement

Local content engagement with EPC contractors, local businesses and other key stakeholders is performed continuously. The focus is on maximising opportunities for the local businesses and workforce in the pipeline's area of influence, within the framework of legislation and procurement best practice.

To improve cooperation with industrial unions and the relevant authorities in TAP host countries, a series of business-to-business (B2B) networking events to address local content have been conducted in Italy, Albania and Greece. The aim is to attract and encourage greater local content from business communities along the route, expanding the social licence to operate and being a good neighbour.

3.6 Outreach Engagement

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

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

Community liaison personnel have been hired, trained and posted in the field to maintain a regular presence locally, personalise the relationship with the project and build trust. Community Liaison Coordinators (CLCs) have been in the field for several years and engage regularly with regional, municipal and community leaders and officials, keeping them updated about the project, gathering field information and addressing any concerns and requests.

3.7 Wider Stakeholder Engagement Efforts

In addition to the engagement activities outlined above, Country Offices have also been active in establishing and maintaining relationships with various national and international key stakeholders:

- **National governments:** TAP enjoys very strong support from all three host governments. Similarly, good working relationships have been established between TAP and the governments of Azerbaijan, the UK, Switzerland, Belgium, Spain and Italy, and their diplomatic missions. Due to their importance and influence on a global scale, the US and German governments are key stakeholders for TAP. The project has therefore been briefing the relevant government stakeholders and diplomatic missions of these two countries as required.
- **Media:** TAP's Communications team has focused on maintaining, protecting and enhancing the project's reputation among its international, national and local stakeholders in Greece, Italy and Albania. This is achieved through engaging with international media and national media in the host countries, participating in key conferences, milestone events, and roundtables, and undertaking advertising and media campaigns.
- **Non-Governmental Organisations (NGOs):** since the project entered its construction and financing phases, TAP has received increasing attention from international NGOs. Based on its experience of engaging with NGOs in the three host countries during ESIA consultations, TAP selected a number of priority NGOs with which its Country Offices are continuing to conduct structured and transparent dialogue. TAP is also engaging NGOs with a view to working in partnership to implement its Social and Environmental Investment programme.

4. Stakeholder Engagement Strategy – Construction Phase

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

TAP retains responsibility for the development of processes and procedures guiding stakeholder engagement and grievance management during the construction process. Engagement related to certain types of impact category will be managed by construction contractors. Where this is the case, commitments have been incorporated into Contractor Control Plans (CCPs) and implementation will be monitored on an ongoing basis. All engagement carried out by contractors must comply with the systems and processes established by TAP for stakeholder engagement and grievance management.

For the construction stage, processes and procedures guiding stakeholder engagement and grievance management correspond to six distinct workstreams:

1. Construction-focused engagement, in particular to notify PAPs and local stakeholders of construction activities and changes to schedules.
2. Livelihood-focused engagement, ensuring that PAPs are aware of livelihood assistance and measures that will ensure restoration of livelihoods to at least pre-project levels.
3. Social & Environmental Investment focused engagement, obtaining the inputs of stakeholders at all levels into the planning and design of appropriate SEI programmes, including livelihood-focused initiatives.
4. Outreach engagement, to continue building a long-term relationship of trust with the broader spectrum of stakeholders, and capture any concerns, ensuring issues and risks are incorporated in project planning.
5. Participatory project monitoring, which involves stakeholders in assessing whether mitigation measures are working as intended and identifying alternatives where there are failings.
6. Grievance management, to stay on top of issues and be responsive to grievances.

Table 4.1: Stakeholder Engagement Responsibilities

Stakeholders	Stakeholder Management Function					Land Management Function					E&S Management Function				EPC
	Stakeholder Manager	Community Liaison Coordinator	Governmental Affairs Senior Advisor	Communications Manager	SEI Manager	LM Manager	Social LM Advisor	LM Advisors	Land Field Monitors	LM Technical and Legal Contractor Staff	E&S Manager	E&S Management Social Expert	Social Field Monitors	Grievance Coordinator	EPC Social Staff
Land owners / users*	-	-	-	-	-	A	E	E	E	E	-	-	-	-	-
Local community members*	A	E	-	-	-	-	-	-	-	-	E	E	E	E	E
Local municipalities	A	E	-	-	-	-	-	-	-	-	E	E	E	-	E
National government	-	-	A	-	-	-	-	-	-	-	-	-	-	-	-
Local government/ public authorities, institutions	A	E	-	-	-	-	-	-	-	-	-	-	-	-	E
Local businesses (associations & operators)	-	-	-	-	-	-	-	-	-	-	A	E	E	E	E
Civil society/NGOs	-	E	A	-	E	-	-	-	-	-	E	E	E	E	-
Media	-	-	-	A	-	-	-	-	-	-	-	-	-	-	-

*Including vulnerable stakeholders

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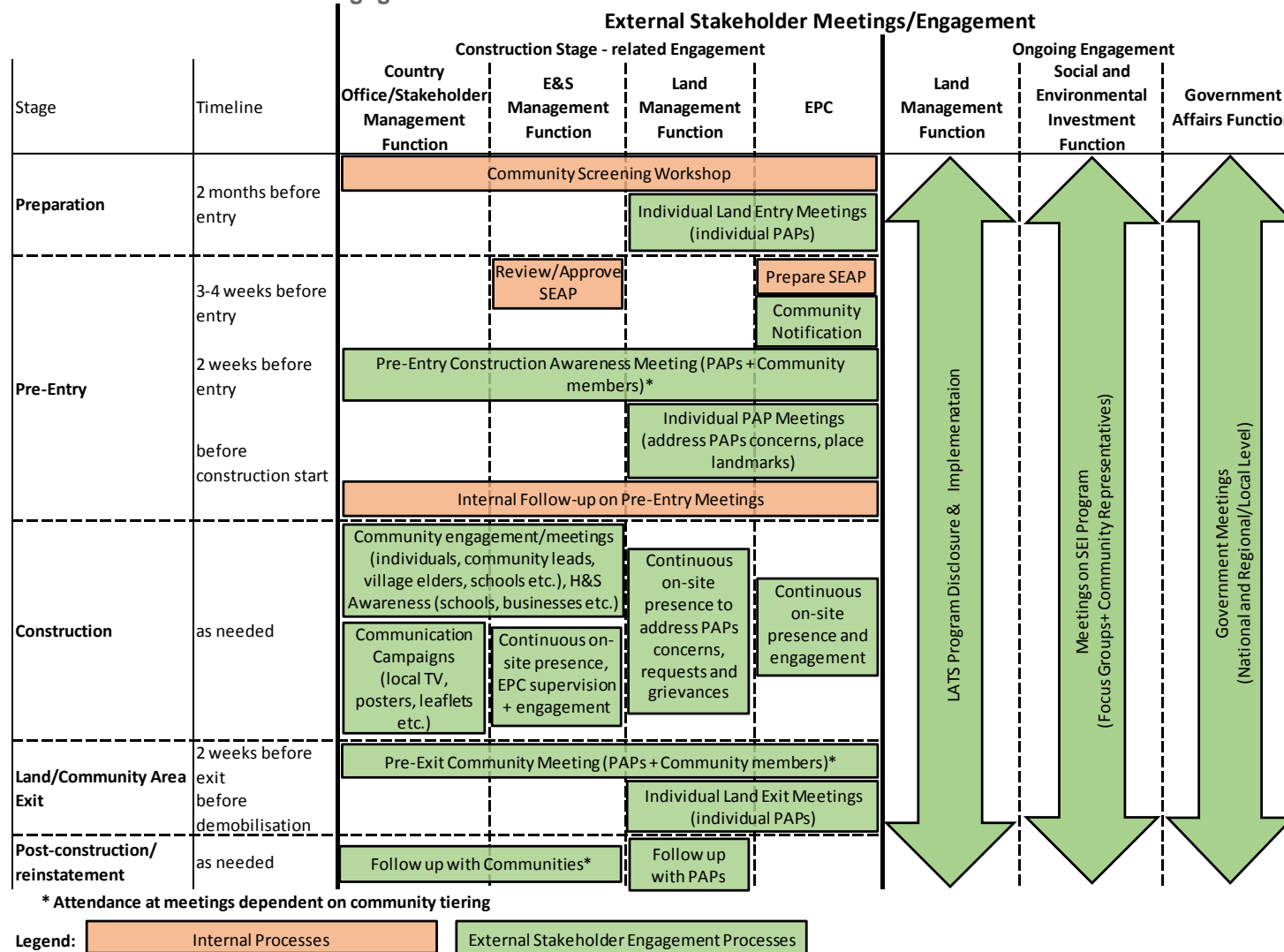
4.2 General Overview of Construction Stage Stakeholder Engagement Process

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

The TAP stakeholder engagement process comprises 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, taking into account changes in engagement requirements.

The stakeholder engagement and internal coordination processes are described further in the following paragraphs.

Figure 4.1: Overview of TAP Stakeholder Engagement



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4.3 Engagement Considerations & Methodologies

Specific engagement methodologies to be employed are discussed for each of the key engagement areas below. Necessarily, specific methodologies chosen have been, and will continue to be, country and context specific. As such, they are not articulated in the high level Stakeholder Engagement Strategy.

However, each stakeholder-facing function in each country, while determining the appropriate engagement techniques to be used for a given engagement objective and type of stakeholder, will take into account the following:

- When engaging with stakeholder representatives, verify that they are legitimate advocates of their constituents' views and can be relied upon to accurately communicate the results of engagement with TAP to their constituents.
- Special engagement efforts may be required to ensure that vulnerable stakeholders are reached and engaged with meaningfully.
- Engagement methods should be gender-sensitive to ensure that women can be reached and engaged with meaningfully.
- Engagement needs to happen in such a way that stakeholders feel free of manipulation, interference, coercion, or intimidation.

4.4 Construction-related Stakeholder Engagement

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

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

4.4.1 Engagement during Construction Preparation Phase

4.4.1.1 Community Screening

As illustrated in Figure 4.1 above, to scale and structure the stakeholder engagement appropriately during the construction stage 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, and associated mapping prepared in support of the Livelihoods and Transitional Support (LATS) programme.

Geographic Information System (GIS)-based maps are generated that 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, and any land-related sensitivities (e.g. number of PAPs with documentation issues in relation to land).

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

The 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) designed to address local sensitivities. 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. Tier 3 community's engagement will be undertaken with the involvement of those stakeholder team functions needed at each specific project implementation stage and with consideration of the local context.

Stakeholder screening is performed within the framework of a workshop led by the Country Office Stakeholder Management function with the participation of all stakeholder engagement functional teams.

Tier 1 working groups are established for the implementation of Tier 1 Engagement Plans. Members are drawn from various Integrated Stakeholder Engagement Team functions and project departments, as required on a case-by-case basis.

4.4.1.2 Individual Land Entry Meetings

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. This engagement is conducted by the Land Management (LM) team function together with EPC stakeholder engagement staff.

This process requires careful preparation to address any concerns including, for example, compensation, orphan land, reinstatement, land use restrictions, etc. 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 LM team and EPC stakeholder engagement staff meet each individual PAP in person to:

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

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4.4.2 Engagement during Pre-Construction Phase

4.4.2.1 Pre-Construction Community Notification and Pre-Construction Construction Awareness Meetings

As part of the stakeholder engagement process, timely notification of construction activities is provided to local communities to facilitate 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 contractor. In accordance with the requirements of the Contractor Control Plans (CCPs), before starting construction of a specific pipeline section or at a project site, the EPC is required to prepare Stakeholder Engagement Action Plans (SEAP) that describe the stakeholder engagement to be performed by the EPC related to the respective construction activities. The SEAPs are subject to review and approval by TAP prior to commencement of works. They inform the planning of TAP stakeholder engagement and its coordination in cooperation with the EPC.

Before construction reaches a particular community area, in line with the respective SEAP, the EPC will notify the local authorities to agree on the date and location of a 'Pre-Construction Awareness Meeting' in the respective community. The EPC sends notification letters and meets local authorities' representatives to confirm the 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.

The intended audiences of the pre-construction awareness meetings include interested community members, representatives of local agricultural associations and local businesses, land owners and users and other interested individuals.

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.

4.4.2.2 Individual PAP Meetings

Prior to construction, PAPs are individually pre-notified and met personally by the team in the field to place construction landmarks and accurately identify and confirm the land actually affected by the upcoming construction works. The outcome of this engagement is documented in Pre-Land Entry Minutes of Meetings (MoMs), which are followed up by the LM team.

4.4.2.3 Internal Follow-up on Pre-Construction Stage Meetings

The outcomes of the Pre-Construction Construction Awareness Meeting and the feedback received, as documented in the MoMs, will be followed up internally and used to confirm or adjust the community tier classification and define subsequent engagement within that particular community during construction.

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4.4.3 Engagement during Construction Works Execution Phase

Permanent on-site presence is ensured by all stakeholder engagement function teams to address the concerns and requests of stakeholders during construction works.

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

- Stakeholder engagement/meetings (individuals, vulnerable stakeholders, community leads, village elders, schools, local businesses, etc.).
- Health and safety awareness training (schools, local businesses, etc.).
- Communication campaigns (local TV, posters, leaflets, etc.) on upcoming construction activities, livelihood restoration, employment opportunities, etc.
- Other engagement in response to the interests and needs of stakeholders.

Stakeholder engagement activities by EPC Contractors during construction include the disclosure of information and engagement relating to project impacts. 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, local content (procurement and employment) as well as grievance management. The stakeholder engagement activities performed by EPC Contractors are defined in SEAPs prepared before construction of a specific section or project component commences and are subject to review and approval by TAP. The implementation of SEAPs by the EPC is assured through the permanent presence on site of TAP social personnel during construction.

Specific training is delivered by TAP to the contractor Community Liaison Officers (CLOs) and ongoing close cooperation is ensured between TAP's in-country E&S Management staff and contractor personnel with stakeholder engagement responsibilities.

4.4.3.1 Engagement associated with Route Social Impact Plan

The Route Social Impact Plan (RSIP) augments the ESMS and associated management plans to provide effective responses to potential residual social impacts. The RSIP identifies all assets and businesses in proximity to the RoW and project infrastructure potentially impacted by construction activities; assesses risks associated with those sites; and identifies cases for further assessment, engagement and mitigation as appropriate. Within this, the project focuses particularly on:

- Areas of known opposition to the project.
- Areas with land related issues.
- Areas of high productivity land or high value crops.
- Grazing/beekeeping.
- Business (particularly those susceptible to environmental changes / construction impacts).
- Areas known for tourism and related operators in the area.
- Irrigation systems and other types of infrastructure/utilities.
- Crossings of heavily used roads.
- Highly populated areas in the vicinity of the pipeline route.
- Secondary access to land (e.g. for agricultural purposes or access to houses).
- Educational facilities (primary, secondary, tertiary) and medical facilities.
- Recreational areas.

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- Cemeteries, churches and other religious facilities (e.g. monasteries) where access/ceremonies could be interrupted during construction.
- Communities with a high concentration of vulnerable groups.

The RSIP enables TAP to proactively manage identified impacts and monitor the implementation of mitigation measures to ensure the maintenance and/or restoration of affected livelihoods and living standards.

As part of the RSIP process, TAP determines levels of local community sensitivity and identifies the need to develop a Tier 1 Engagement Plan (TEP). TEPs are established where there are particular social or stakeholder sensitivities in a project-affected location or clusters of households or businesses experiencing similar significant impacts. The scale and complexity of stakeholder issues in Tier 1 communities typically require commitment to levels of engagement, resourcing and support in excess of those generally applied in country SEPs.

RSIPs are being implemented in Albania and Greece. Where appropriate, a similar assessment may be completed in Italy relevant to the scale of construction and number of affected land parcels.

4.4.4 Engagement during Land/Community Area Exit Phase

4.4.4.1 Pre-Exit Community Meetings

Before construction works are completed in a particular community's area, TAP will notify the local authorities and will agree on the details of a 'Pre-Exit Community Meeting', aiming for a similar attendance to the Pre-Construction Awareness Meeting.

The main scope of the meeting is to:

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

4.4.4.2 Individual Land Exit Meetings

Upon completion of construction and reinstatement in temporarily occupied land (pipeline construction corridor and temporary facilities), the LM Team and the EPC Contractors perform exit inspections with all affected owners and users.

If the inspection concludes that reinstatement is satisfactory, the usage right of the affected land plot will be handed back to the land owner and/or land user for agricultural activities. Any claim arising from potentially unsatisfactory reinstatement will be managed through the grievance management mechanism.

During the exit inspection, the LM team also provide the landowner/user with all required information in respect of permissible and restricted activities on the land plot, both in writing and verbally, and contact details of the team responsible for the monitoring of the project during operations. The contents of the Easement Agreement signed upon entry into land is explained again to the land owner.

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4.4.5 Post-Construction Phase Engagement

After construction and reinstatement works within a particular community area are finalised, TAP periodically meets the local authorities and community leads 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, following up residual concerns or grievances, and ensuring that any potential land management or land restoration-related issues are addressed and closed.

Follow-up engagement with project-affected landowners and users, including vulnerable stakeholders, is undertaken as part of Livelihood Restoration Plan (LRP) monitoring and LATS programme implementation. This engagement assesses the extent to which the livelihoods of affected households are restored, verifies that measures to restore or enhance the quality of life and livelihoods of project-affected people are being implemented, and assesses their effectiveness.

4.5 Livelihood Restoration-related Engagement

Throughout the construction phase, TAP will continue to engage with individuals and communities affected by land easement and acquisition as part of its LRP implementation. This includes monitoring the effectiveness of EPC contractors in executing land entry and exit protocols; overseeing any necessary additional land take carried out by contractors; and follow-up monitoring with PAPs to document the effectiveness of livelihoods restoration.

TAP also performs engagement activities within the framework of the LATS programme. Its goal is to ensure that those people whose land is temporarily or permanently acquired are able to restore or, where possible, improve their livelihoods to pre-project levels.

Several tools have been developed by TAP to support the implementation of LATS. This includes 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 identify priority areas for the LATS programme.

The Vulnerable Household Watch List identifies and helps TAP monitor PAPs considered 'vulnerable'. Special measures taken by TAP for this category of stakeholders include home visits to review contracts and agreements, support with transport 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 are also using 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 PAPs at a higher risk of experiencing negative project impacts (e.g. 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 those who may require transitional support and/or additional, specialised assistance).

Detailed LATS components and implementation schedules are provided in the country-specific LATS documents.

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.

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4.6 Social and Environmental Investment (SEI) related Engagement

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.
- 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 and regional government and key development actors and NGOs.

This engagement will ensure a clear and up-to-date understanding of community needs and that communities have the opportunity to contribute to the priorities for development interventions. It is hoped that communities will contribute to the majority of SEI interventions themselves, either financially or in kind. The intention is to include community participation in the monitoring and evaluation of SEI projects.

4.7 Outreach Engagement

Through outreach engagements, TAP will continue to deliver thematic campaigns to build knowledge and shared understanding among stakeholders on specific topics that will inform TAP's longer-term stakeholder engagement strategies.

The Country Office (CO) Stakeholder Management (SM) teams in each country will plan the engagement with stakeholders along the pipeline corridor and build a schedule of proactive and ongoing engagements (the Outreach Calendar) accordingly. Relevant commitment areas from the ESIA Commitments Register will be worked into the Outreach Calendar.

The capacity of stakeholders to participate in the engagement in a meaningful way will be assessed and developed if required. Relevant information will be prepared and disclosed in a timely manner to support this ongoing engagement. The outcomes of engagements will be recorded systematically in the Grievance and Stakeholder Management Database and commitments tracked for adequate follow-up.

4.8 Wider Engagement Efforts

Country Offices will continue to establish and maintain relationships with various key national and international stakeholders. This will include engagement with national governments, media and NGOs.

4.9 Participatory Monitoring

In the ESIA documents, TAP commits to involve third parties in the monitoring of project activities. In each of the host countries, these commitments include:

- Agreement on scope of third-party monitoring with government and other stakeholders.

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- Publication of third-party monitoring reports on the TAP website.
- Involvement of project-affected stakeholders or third-party representatives in monitoring TAP's socio-economic and environmental performance.

How these commitments will be operationalised is currently under internal review. Options are currently being explored for involving stakeholders, including PAPs and third parties, in project monitoring and implementation in relation to the following:

- Construction oversight and land reinstatement.
- Development and roll-out of livelihood initiatives, including agricultural programmes.
- Planning and implementation of social and environmental Investment programmes, including, in particular, livelihood-focused initiatives.

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5. Grievance Management

5.1 Introduction

Full details are set out in TAP's Grievance Management Framework (GMF), TAP's Third Party Grievance Procedure, 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.

To ensure an aligned approach and methodology in managing grievances across its operating countries, TAP's Grievance Mechanism is underpinned by three elements:

- The Grievance Management Framework.
- Country-specific grievance procedures.
- The Grievance and Stakeholder Management Database.

TAP recognises that each of the operating countries is fundamentally different. Therefore, the purpose of implementing country-specific procedures is to ensure that TAP can manage and resolve grievances based on structures and processes that are familiar with PAPs in each of these countries and in accordance with national legislation.

Both the Grievance Management Framework and the country-specific procedures are living documents and will be updated, as required, as part of TAP's commitment to ensuring that its grievance management process remains relevant, accessible and effective.

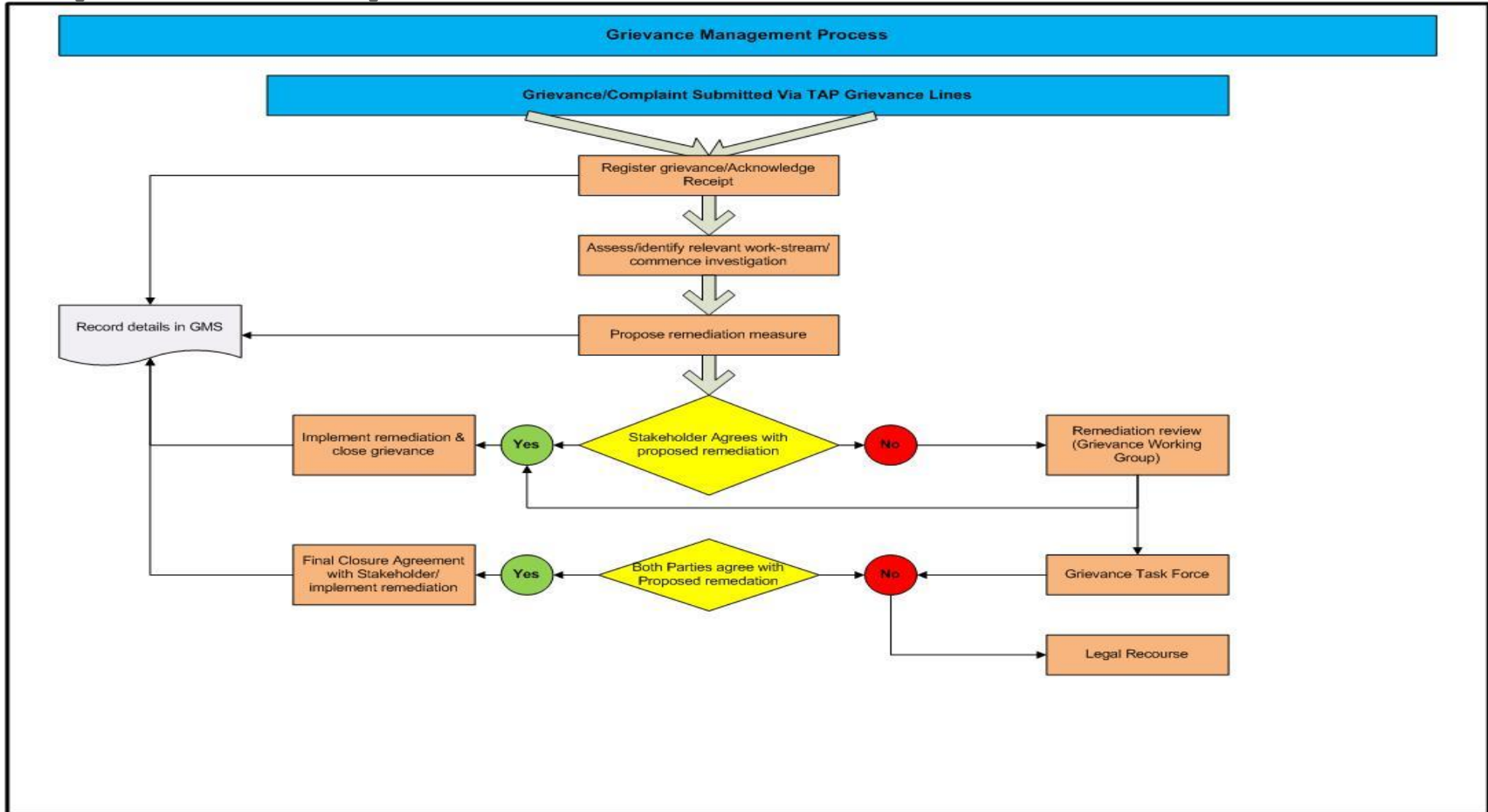
TAP's Grievance Mechanism (GM) was revised for the construction phase and made available through all identified channels that are accessible to local stakeholders.

The GM is communicated in a format and language readily understandable to local populations. To ensure that all stakeholders are aware of how to submit grievances, TAP has also created additional grievance communication materials including posters and pamphlets, as well as an engagement plan for the Grievance and Information Hotline. These materials are distributed at TAP regional offices and worker camps.

5.2 Grievance Management Process

A brief overview of TAP's Grievance Management Process is illustrated in Figure 5.1 overleaf.

Figure 5.1: TAP Grievance Management Process



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The grievance management processes for each country are described in detail in the relevant country-level documents and are also available on TAP's website. Grievance forms are available on the TAP website, from TAP in-country personnel and its contractors, and via the TAP project offices. Grievances can also be submitted directly on the TAP website. EPC contractor GMs are available directly from the contractors and any grievances submitted through these GMs are recorded in the TAP Stakeholder and Grievance Management Tool (SGMT).

All incoming grievances are recorded, tracked and managed in the SGMT by the in-country Grievance Coordinator. This allows an ongoing flow of information, enabling the TAP to understand and monitor its impact over the course of project implementation. Any requests for information captured in the grievance process that are not related to grievances will be sent to the affected TAP workstream or 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 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. Information Disclosure

TAP is committed to making all relevant information accessible to interested and affected parties on a regular basis and communicating such information in a manner that is understandable to stakeholders.

Information will be disclosed in a variety of formats in each country, including meetings, documents and brochures in the local language, the media, and posting on the TAP website.

Information disclosure during the construction stage will be divided between TAP and its contractors. TAP is responsible for information disclosure related to overall project progress, grievance mechanisms, land reinstatement, livelihoods programmes, and social and environmental investment programmes.

Contractors are responsible for the disclosure of information about construction-related project impacts. This includes issues of community health, safety and security, loss of access to infrastructure and utilities, additional land impacts, and local content (procurement and employment).

However, TAP retains responsibility and control over how information is disclosed and approves all communication materials to be published externally.

As Stakeholder Engagement occurs across several 'social-facing' functions, and to avoid confusion and conflicting messages, attention is given to the consistency of information conveyed to stakeholders. Each stakeholder-facing function will put in place a system to track gaps and issues regarding consistency in the information provided.

When identified, information gaps and consistency issues will be sent respectively to the ESMS Social Expert, the Senior LEA Advisor, and/or the SEI Advisor, who will issue an internal information update. They may receive support from the Communications Department when addressing identified information gaps that require dedicated communications support.

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7. Stakeholder Engagement Coordination and Monitoring

7.1 Alignment of Social and Stakeholder Management Functions

The Social Impact Management Plan (SIMP) describes the alignment of social functions within TAP. Overall responsibility for TAP social impacts and stakeholder management rests with the Commercial and External Affairs Director who heads the TAP Corporate Assurance Team. The Assurance Team ensures the integration of the project's environmental and social management organisation at corporate level and, through the various Country Offices, the country-level integration of stakeholder relations, government affairs and social investment functions.

Stakeholder engagement functions are represented in the Corporate Assurance Team by the corporate staff responsible for coordination of stakeholder management, social investment, government affairs and communications across the TAP project. The Country Offices are generally responsible for in-country stakeholder engagement, although Environmental & Social (E&S) teams are responsible for construction-related community-level engagement and Land Management teams conduct engagement on land access and compensation matters. Where engagement is conducted by EPC contractors, project requirements are defined in Contractor Control Plans (CCPs) and implementation monitored on an ongoing basis. All contractor-managed processes comply with the standards established by TAP for stakeholder engagement and grievance management.

The Corporate Assurance team conducts monthly cross-functional meetings to review TAP's social performance and agree strategic responses to emerging social issues, identified areas of underperformance or changes in the project's social or stakeholder environments. Monthly cross-functional meetings ensure effective integration between the E&S Manager and other social functions such as Stakeholder Engagement, SEI, Security, Communications and Land Managers. There is a similar arrangement at country level to provide coordination between the Integrated Project Management Team (IPMT) and the Country Office Stakeholder Manager, CLCs and SEI Manager functions. The monthly cross-functional meetings are based on country-level reports coordinated by the E&S teams with input from Land Management, Country Offices, EPCs and others.

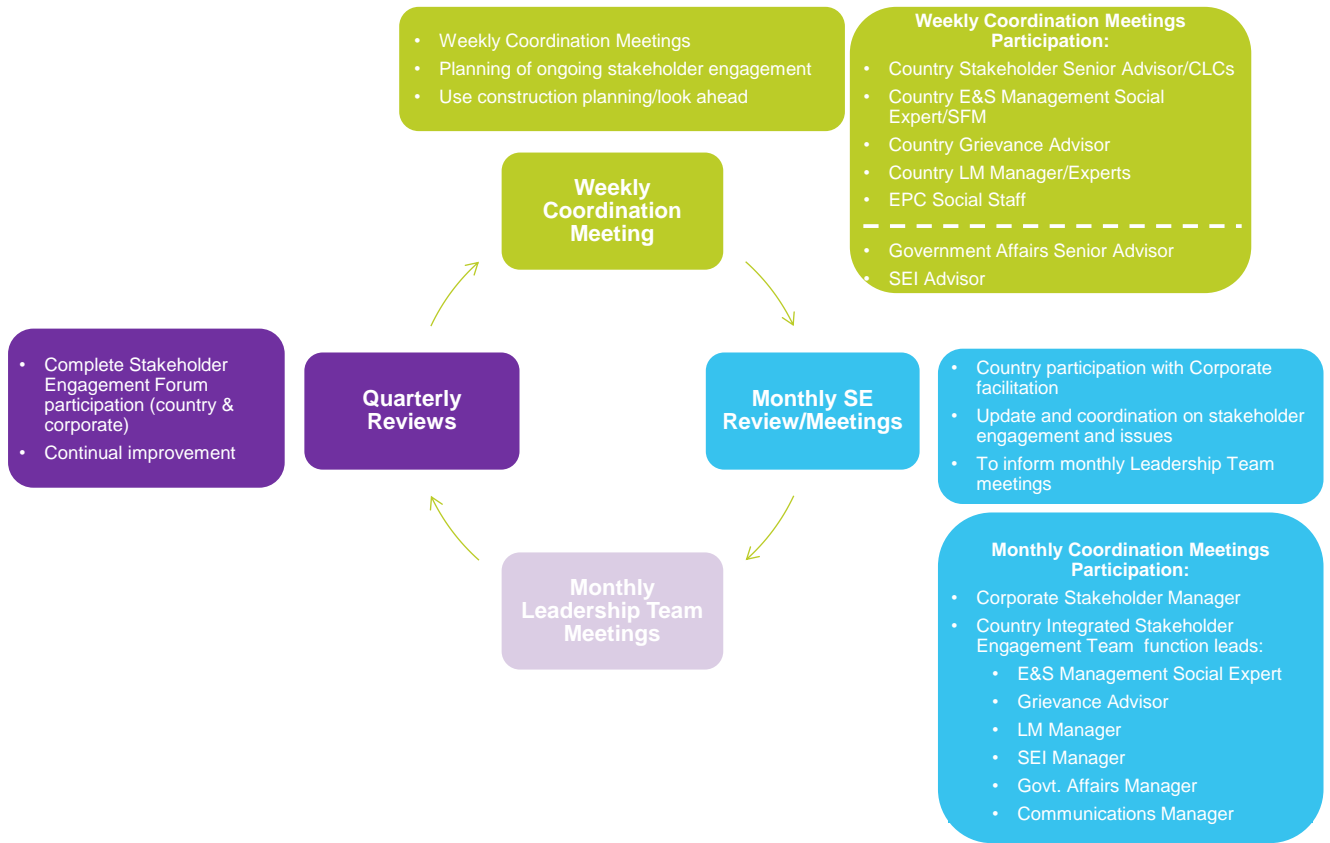
7.2 Internal Coordination

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 in each country.

The Integrated Stakeholder Engagement Team members and the EPCs participate in regular coordination meetings as illustrated in figure 7.1 below.

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Figure 7.1: Stakeholder Engagement – Coordination Meetings



Weekly coordination and monitoring meetings take place in the field, at the EPC contractor facilities. 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 is in charge of organising the weekly coordination meetings.

On a monthly basis, the country stakeholder engagement functional leads participate in a Stakeholder Engagement Review Meeting by country, co-ordinated and facilitated by the Corporate Stakeholder Manager. These monthly meetings are held by teleconference and are aimed at reviewing foregoing month engagement, ensuring coordination and monitoring of the engagement process between in-country and corporate-level teams, and looking ahead to the next monthly phase of stakeholder engagement.

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

On a quarterly basis, TAP performs reviews of the performance and risks associated with 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.

7.3 Capacity Building

TAP encourages sharing of experiences between the three operating countries.

Staff undertaking SE work will be trained in:

- Basic skills such as interest-based negotiations, expectations management, managing conflict situations and behavioural skills. Contractors will also be responsible for training their own staff in basic SE skills.
- The use of the Grievance and Stakeholder Management Database. TAP is responsible for the provision of training to contractors on the database.
- The Voluntary Principles for Security and Human Rights (VPSHR). 'Train-the-trainer' sessions will be conducted with the security team so that contractors can conduct training sessions with their security personnel.

7.4 Monitoring & Evaluation

All Stakeholder-facing functions are developing Monitoring and Evaluation (M&E) frameworks for their SE activities. This will determine and measure:

- Relevant key performance indicators (KPIs).
- Stakeholder satisfaction with the engagement process (e.g. by tracking participation levels, but also incorporating formal independent surveys).

Examples of key performance indicators (KPIs) being used by TAP for evaluating the effectiveness of stakeholder engagement activities and analysis of trends are provided in Table 7.1.

Table 7.1: KPIs

Outreach	Actual	Planned	%
Number of outreach sessions/meetings conducted.			
HSE community training sessions conducted.			
% of pipeline corridor communities informed.			
% of participation in pre- entry/pre-exit construction awareness meeting.			
Planned number of participants in outreach sessions.			
Visits	Actual	Planned	%
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 into SGMT			
Issues/Commitments	Actual	Planned	%
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).			
E&S Management	Actual	Planned	%
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.			
Grievance	Actual	Planned	%
Efficiency: total number of grievances received and resolved, number of grievances 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 of 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