



# Stakeholder Engagement Plan

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**TRANS ANATOLIAN NATURAL GAS  
PIPELINE PROJECT (TANAP)**



**Stakeholder Engagement Plan**

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## ACRONYMS AND ABBREVIATIONS

Acronym and Abbreviation	Definition
AGI	Above Ground Installation
BOTAS	Petroleum Pipeline Corporation of Turkey
BVS	Block Valve System
CLO	Community Liaison Officer
CRF	Complaint Register Form
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESMMP	Environmental and Social Management and Monitoring Plan
IFC	International Finance Corporation
LRE	Land Rights Entity
MoEU	Ministry of Environment and Urbanisation
NGO	Non-Governmental Organization
PAP	Project Affected People
PCDP	Public Consultation and Disclosure Plan
SEP	Stakeholder Engagement Plan
SOCAR	State Oil Company of Azerbaijan
TANAP	Trans Anatolian Natural Gas Pipeline
TBMM	Turkish Grand National Assembly
TPAO	Turkish Petroleum Corporation

# 1.0 Introduction

## 1.0 INTRODUCTION

This "Stakeholder Engagement Plan ("SEP") document has been prepared by Golder Associates S.r.l. and Golder Associates Ltd. ŞTI (collectively referred as "Golder") for Azerbaijan South Caucasus Pipeline Ltd., the affiliate company of State Oil Company of Azerbaijan (SOCAR), represented by Trans Anatolian Gas Pipeline Project ("TANAP" or "Client"). TANAP will be responsible for implementing the SEP and has been actively involved in developing the document with assistance from its consultants.

The TANAP project will consist of the design, construction and operation of a 1,900 km pipeline intended for the transport of natural gas from the eastern border of Turkey to the country's western border. The SEP is intended to meet the International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability and the Environmental and Social Policy of the European Bank for Reconstruction and Development (EBRD). The SEP has been prepared in accordance with TANAP's social policy and other corporate standards.

### 1.1 Objectives of the SEP

The overall objective of the SEP is to explain how TANAP will engage with stakeholders through the course of the Project. Stakeholder engagement is a key activity within large- scale projects such as the present one, because it creates an open communication channel with stakeholders, it allows stakeholders to understand significant impacts of the project and helps the sponsor address local expectations and incorporate feedback in the project design, overall fostering the achievement of a sound and comprehensive project. SEP presents a plan for consultation designed to: provide timely information about the project and its potential impacts to project affected people (PAP) and other stakeholders; provide opportunities to those groups to voice their opinions and concerns in a way that is most appropriate to their circumstances; and provide an opportunity for feedback to, and discussion with, those settlements concerning measures proposed.

The SEP aims to;

- Identify key stakeholders and ensure there are adequate mechanisms for stakeholder feedback and information sharing;
- Provide an outline for consultation at the local, national and international levels, starting at the Project planning stage, and continuing throughout construction, operation and decommissioning of the pipeline;
- Ensure issues raised by key stakeholders are addressed in the ESIA as well as in project decision-making and design phase; and
- Outline a grievance mechanism for all stakeholders.

The SEP is a working document that will be revised during the development of the Project. This version of the SEP is a planning and management document, which explains what stakeholder engagement activities will be done during the ESIA process, and throughout the entire lifespan of the Project (construction, operation and decommissioning phases). A specific Guideline Document will support the implementation of the SEP. Subsequently, the SEP will be revised to reflect a list of planned meetings and other stakeholder engagement activities. As part of the impact assessment, which aims to measure and predict actual impacts, stakeholder engagement attempts to capture the perceived impacts of the project. The final ESIA will include a Consultation Report to explain how stakeholder activities were implemented throughout the ESIA process. The Report will include issues, concerns and questions raised during the ESIA, as well as TANAP's response related to how such issues have been addressed.

As part of the package of management plans prepared in the ESIA process, there will also be an updated SEP with additional details on stakeholder engagement throughout the remaining phases of the Project.

This SEP presents a plan for stakeholder consultation that includes the following key elements:

- **INFORM:** provide accurate, relevant, timely and culturally appropriate information to stakeholders about the TANAP Project, its impacts and benefits, and the ESIA process;
- **ENGAGE:** provide opportunities for stakeholders to express their opinions and concerns about the Project, and to seek broad stakeholder support for the Project and impact management;
- **UNDERSTAND:** enable the TANAP Project team to understand the concerns and priorities of stakeholders;
- **REVIEW:** incorporate these concerns and priorities into the design, construction and operation of the TANAP Project; and
- **INFORM:** provide feedback to stakeholders as the project develops so that the consultation process continues.

It is critical that collaboration, partnership and learning are the main structural functions of the engagement process. Stakeholder feedback is a source of valuable information that will be integrated into core business and strategic process.

All stakeholders are invited to review and provide feedback on Project activities. Such feedback will be taken into consideration in future revisions of this SEP.

This document is available in English and Turkish. Additional copies can be downloaded from the TANAP website. All comments and questions welcome and should be sent to the contact details located in Section 7.0, Roles and Responsibilities.

### 1.2 Project Justification

With Trans Anatolian Natural Gas Project, it is planned to distribute the natural gas resourced from the natural gas reserves located in Şah Deniz-2 Field in Azerbaijan, other fields in Azerbaijan and in surrounding neighbour countries to Turkey's internal market and to transmit the natural gas to the European countries via Turkey.

Natural gas, which is a source of energy with an ever-increasing share among the energy sources of the world owing to its prominent advantages, is the subject of the significant commercial trends in the international field. Turkey, being a developing country with its rapidly increasing energy demand, natural gas constitutes one of the important factors for a rapid and sustainable economic development.

### 1.3 Brief Project Description

With Trans Anatolian Natural Gas Project, it is planned to transmit the natural gas extracted from the natural gas reserves located in Şah Deniz-2 Field in Azerbaijan and/or other fields in Azerbaijan and in surrounding neighbor countries to Turkey's internal market and to the European countries via Turkey.

Within the scope of "the Intergovernmental Agreement Concerning the Sales of Natural Gas to the Republic of Turkey and the Transit Passage of Natural Gas Originating from the Republic of Azerbaijan Across the Territory of the Republic of Turkey and the Development of a Standalone Pipeline for the Transportation of Natural Gas Across the Territory of the Republic of Turkey", which was signed on 25 October 2011 between the Government of the Republic of Turkey and the Government of Azerbaijan Republic, and also subsequent to this Agreement in relation with the intention of the two states as the parties of the agreement to construct a new standalone pipeline, the Memorandum of Understanding was signed on 24 December 2011 between the Republic of Turkey Ministry of Energy and Natural Resources and the Republic of Azerbaijan Ministry of Industry and Energy and it was approved by Turkish Grand National Assembly TBMM and the ratification acts were published in the Official Gazette No. 28351 dated 12 July 2012.

Within the framework of the Memorandum of Understanding, it was decided that a Project Consortium be established for the purpose of fulfilling the design, construction and the subsequent operation of Trans-Anatolian Natural Gas Pipeline Project (TANAP) and that the feasibility studies for the Project and other relevant activities be conducted by State Oil Company of the Republic of Azerbaijan (SOCAR) and TANAP Project Entity is established and authorized by SOCAR as the project owner.

The companies assigned by two countries to form a project-specific joint consortium are State Oil Company of the Republic of Azerbaijan (SOCAR) and Petroleum Pipeline Corporation (BOTAŞ) together with Turkish Petroleum Corporation (TPAO).

In continuation of the process, to lay out the legal, technical and commercial elements of TANAP Project, "Inter-Governmental Agreement Regarding the Trans Anatolian Natural Gas Pipeline between the Governments of the Republic of Turkey and the Republic of Azerbaijan and its annex "Host Government Agreement" were signed on June 26, 2012 in İstanbul. The aforementioned agreements were deemed suitable to be approved pursuant to the Law No 6375, and were approved through the Decision of the Cabinet Council. The agreements were published in the Official Gazette on March 19, 2013.

The Pipeline System will be an approximately 1,950 Km long buried natural gas pipeline system including all above and underground facilities. These facilities will include the pipeline, compressor stations, metering stations, off-take stations, block valve stations, SCADA, telecom and control systems, and other related equipment and installation. Moreover; temporary construction facilities such as the camp sites, temporary pipe stock yards, power transmission lines, access roads, etc. will be used in the construction phase of the pipeline. Locations of the compressor stations, pig stations, block valve stations, measurement stations and off-take structures and other above ground installations (camp sites and pipe stock yards, etc.) explained above will be determined at the further stages of the Project during design studies and elaborated in the EIA/ESIA Study.

The pipeline is planned to start at the Georgian border of Republic of Turkey (Ardahan Province, Posof District) and end at the Greek border (Edirne Province, İpsala District) and/or the Bulgarian border (Kırklareli Province, Kofçaz District), to pass through the provinces of Ardahan, Kars, Erzurum, Erzincan, Bayburt, Gümüşhane, Giresun, Sivas, Yozgat, Kırşehir, Kırıkkale, Ankara, Eskişehir, Bilecik, Kütahya, Bursa, Balıkesir, Çanakkale, Tekirdağ, Kırklareli and Edirne. The number of communities that will be affected by the project is not precisely known, but will be clarified in the Social Impact Assessment process.

Trans-Anatolian Natural Gas Pipeline (TANAP) Project enters Turkey at Georgia- Turkey/Türkgözü border and goes southwards to Horasan-Erzurum region, and after this point, in general terms, it moves westwards to the locations near the Dardanelles of Marmara Sea, passing between the north of Kemer Village on Anatolian side and the south of Kızılcaerzi Village in Thrace. The length of the pipeline for the marine crossing is about 18 km. In the Figure 1 and the Figure 2 below, the approximate lengths of the project route are illustrated.



Figure 1: Illustration of the Passage through the Marmara Sea

Within the borders of the province of Çanakkale, the pipeline separates into two branches between Evreşe and Kavakköy. A branch (1) of the pipeline enters the borders of the province of Tekirdağ and proceeds via Kırklareli and near Kırklareli/Malkoçlar Village to Bulgaria. The other branch (2) of the pipeline proceeds into the borders of the province of Edirne and enters via Edirne/İpsala to Greece, thereby heading towards Europe. In the Figure 2. below, the approximate lengths of the project route are illustrated.

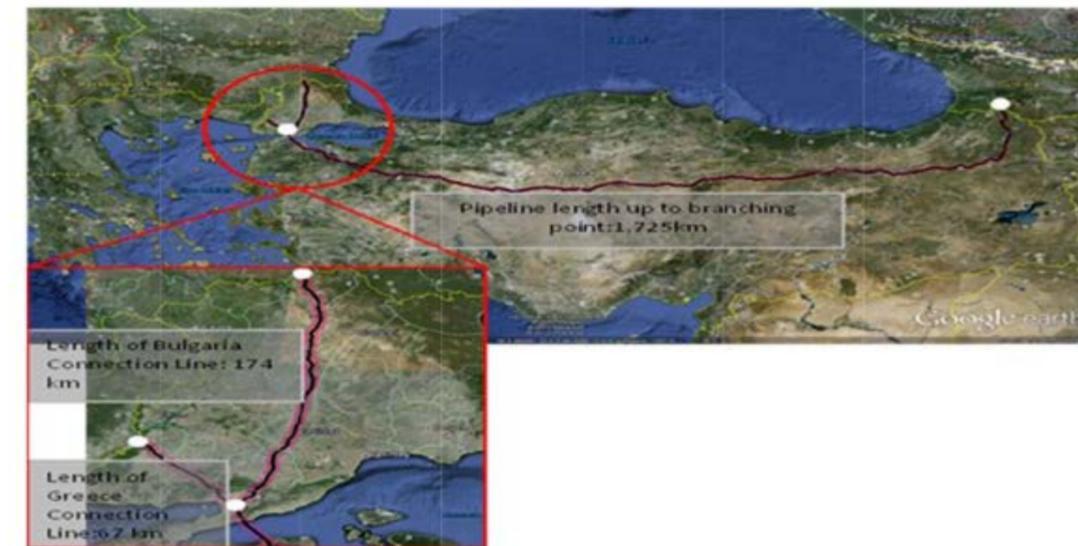


Figure 2: Illustration of the Project Route Lengths

The TANAP Project will take into consideration potential cumulative impacts related to the existing pipeline projects (Blue Stream Natural Gas Pipeline, Eastern Anatolia Natural Gas Transmission Line, Turkey-Greece-Italy Natural Gas Pipeline (ITGI) Project, Baku Tbilisi Ceyhan (BTC) Crude Oil Pipeline) and the planned pipeline projects (Nabucco Natural Gas Pipeline Project, Iran Turkey Europe Natural Gas Pipeline Project –ITE) (See: Figure 3).





**Stakeholder Engagement:** An emerging term to describe a broader, more inclusive and continuous process between companies and stakeholders. The term encompasses a range of activities and approaches that spans the entire life of the Project (IFC, 2007).

**Stakeholder Engagement Plan (SEP):** Relatively new term for the stakeholder engagement planning document. The SEP, often called a Public Consultation and Disclosure Plan (PCDP), is a key component required for verifying compliance with international standards on public disclosure.

## 2.0 Legislations and International Standards

## 2.0 LEGISLATIONS AND INTERNATIONAL STANDARDS

TANAP intends to fund the TANAP Project partly with foreign loans and has committed to undertake an Environmental and Social Impact Assessment (ESIA) compliant with national and international standards and best practices. The Stakeholder Engagement Process of the TANAP project will conform to:

- National Legislations;
- Guidelines established by international financial institutions, specifically the IFC and EBRD; and
- European Commission Requirements,

The main requirements are set out in the following sections.

### 2.1 National Legislation

The related legislation related to stakeholder engagement and consultation component of the project is described below.

#### I. THE CONSTITUTION OF THE REPUBLIC OF TURKEY

“The Constitution of the Republic of Turkey” is the main document related to the stakeholder engagement component of the project. The articles of the Constitution related to engagement issues are listed below:

##### VII. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal his thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of his thoughts and opinions.

##### VIII. Freedom of Expression and Dissemination of Thought

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or in pictures or through other media, individually or collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities.

##### VIII. Health, the Environment and Housing

###### A. Health Services and Conservation of the Environment

ARTICLE 56. Everyone has the right to live in a healthy, balanced environment.

It is the duty of the state and citizens to improve the natural environment, and to prevent environmental pollution.

##### XI. Conservation of Historical, Cultural and Natural Wealth

ARTICLE 63. The state shall ensure the conservation of the historical, cultural and natural assets and wealth, and shall take supportive and promotive measures towards that end.

##### VII. Right of Petition

ARTICLE 74. Citizens and foreigners resident considering the principle of reciprocity have the right to apply in writing to the competent authorities and to the Turkish Grand National Assembly with regard to the requests and complaints concerning themselves or the public.

The other law related to involvement of stakeholders to the Project include the Expropriation Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215).

(Amended 03.10.2001-article 4709/26) The response to or the actions taken in response to the application of the petitioner shall be made known to the petitioner in writing without delay.

(Abolished: 12.09.2010-article 5982/8)

(Additional clause: 12.09.2010-article 5982/8) Everyone has the right to receive information and apply to the government auditor.

However, the TANAP Project in Turkey is governed by the Host Government Agreement (HGA).

Article 17.1 in HGA stated that; The environmental, social and community health impact relating to the TANAP Project shall be established by the TANAP Project Entity, after completion of an environmental and social impact assessment to be conducted in respect to the TANAP Project in accordance with this Article 17 and shall be recorded in written form (to be prepared by the TANAP Project Entity for approval by the HGA) (the Environmental and Social Standards”) Such E&S Standards shall comply with National Laws and shall also take due account of international standards and practices generally prevailing in the Natural Gas pipeline industry, including relevant Performance Standards of the International Finance Corporation.

#### II. CIVIL LAW

Real property rights and restrictions are defined under relevant section of Civil Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and met in all phases of the Project.

#### III. LAW ON THE RIGHT TO INFORMATION

Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. Everyone has right to information on the activities of the public institutions and the professional organisations, which qualify as public institutions.

#### IV. LAW ON THE USE OF RIGHT TO PETITION

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities with regard to the requests and complaints concerning themselves or the public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreigners resident have this right considering the principle of reciprocity and drawing up petitions in Turkish.

#### V. EXPROPRIATION LAW

The administration action of the expropriation process is done in line with the Expropriation Law No. 2942 (Issued on 08.11.1983, Official Gazette No. 18215) according to its purpose, authorization, procedure, reason and subject of the action.

#### VI. ENVIRONMENTAL LAW

In addition to the legislation explained above, the fundamental law in Turkish Environmental Legislation is the Environmental Law No.2872 (Issued on 11.08.1983, Official Gazette No.18132, amended by Law No. 5491). According to Environmental Law, citizens as well as the State bear responsibility for the protection of environment based on the “polluter pays” and “user pays” principles. The Law is supported by numerous Regulations and decrees prepared or updated in the process of alignment with European Union legislation.

The Ministry of Environment and Urbanisation (MoEU) is the responsible authority for the issuing and implementation of policies and legislation adopted for protection and conservation of the environment, and for sustainable development and management of natural resources, in addition to policies and legislation related to urban planning.

The main stages of the Environmental Impact Assessment are defined by the Turkish Regulation on Environmental Impact Assessment (EIA) (17.07.2008, OG No. 26939, amended 30.06.2011). On the other hand, if any project will be carried out with foreign loans (funding agencies, international financial institutions etc.), the project owner will fall under the standards and requirements of the funding institutions (and EU Environmental Impact Assessment Directive and other relevant EU directives if the funding institution is from the EU).

The projects requiring an Environmental Impact Assessment Report, the EIA process and other relevant principles and procedures are detailed in the Environmental Impact Assessment Regulation. The first Turkish EIA Regulation was put into force in 1993 and it was amended in 1997, 2002 and 2003 and finally last EIA Regulation came into force on July 17, 2008 and lastly amended 30.06.2011. The projects are divided in two groups in Turkish EIA Regulation according to the potentially expected environmental impacts. These are Annex 1 (directly subjected to a full EIA Report) and Annex 2 (subject to Screening by MoEU to derive a decision whether or not an EIA is needed). TANAP Project is an Annex 1 project according to Turkish EIA Regulation and requires a full EIA report.

The projects listed in Annex I are directly subjected to a full EIA Report. The EIA process begins with the submission of the EIA Application File to the MoEU and this is to be prepared in accordance with the format set out in the Regulation. If the EIA Application File is prepared fulfilling the format requirements of the MoEU, a Commission is established by the MoEU. Initiation of the EIA Process is announced to the public through the relevant Governorship.

Prior to Scope and Special Format Determination Meeting, a Public Participation Meeting, as required to suit the scale of the project is organized in order to inform the public and elicit feedback including getting their opinions and recommendations on the project. According to EIA Regulation, prior to Environmental Impact Assessment process, the project owner may organize studies such as surveys or seminars in order to inform the public.

The place of the meeting shall be determined with the MoEU Provincial Directorates from the Provinces affected and the owner of the project. Care shall be taken in determination of the meeting place in such a way that easy access is ensured to the public most likely expected to be affected by the project.

The project owner shall have an announcement published in a national newspaper and a local newspaper of that vicinity at least 10 days before the date of meeting stating the date, time, place, and subject of the meeting. In addition to this, the meeting can be announced through Mukhtar or local parties.

The meeting shall be chaired by the Provincial Director of MoEU or an official assigned by him. In the meeting, it shall be ensured that the public is informed about the project and their opinions, questions, and recommendations are taken. The Chairman may ask the participants to give their opinions in writing. The minutes of the meeting, one copy to be kept at the Governorate, shall be sent to the Ministry.

The Governorate shall announce to the public the time schedule and contact information regarding public participation meeting and process in which the public will be able to communicate their opinions and recommendations. Public opinions and recommendations shall be submitted to the Commission in accordance with the time schedule.

The Commission Members may examine the project application area prior to Scope and Special Format Determination Meeting and may participate in the public participation meeting in line with the date communicated to them. The secretariat service regarding public participation meeting works shall be carried out by the Provincial Directorate of the MoEU.

The EIA Report's special format is decided by the Commission by taking into account the comments and suggestions collected during the Public Participation Meeting. The EIA special format defines the EIA's scope for the project and outlines studies to be prepared during the EIA process.

After the submission of the EIA Report, the examination and assessment process begins. The public is notified that the examination and assessment process for the project has been initiated and the EIA Report is available for public review. The public's opinion is taken into consideration and reflected in the final EIA Report.

The EIA Report is examined by the Assessment and Evaluation Commission. The members of Commission are assigned within the framework of their authorities, tasks, and responsibilities and address the subjects relating to the central or local institutions and organizations which they represent. In the assessment and evaluation meeting, the following are assessed:

- Whether the EIA report and its appendices are sufficient and appropriate;
- Whether there is adequate information, data, and documentation;
- Whether environmental impacts and measures are identified comprehensively and sufficiently; and
- Whether issues highlighted in the Public Participation Meeting have been sufficiently addressed and resolved.

If the Commission considers it necessary, amendments to the report are requested. EIA report finalized by the Commission is then made available for public review. Considering the public opinion as well, the MoEU then renders a decision regarding whether they have found the EIA positive or negative.

The EIA process is illustrated in the following diagram of Figure 5.

### EIA Process



Figure 5: EIA Process diagram

## 2.2 International Standards

### European Commission

While Turkey is not bound by European legislation, TANAP will seek to develop stakeholder engagement in compliance with European Union environmental policy.

Environmental Impact Assessment (EIA) is a key instrument of European Union environmental policy. Since the inception of the first EIA Directive in 1985 (Directive 85/337/EEC) both the law and the practice of EIA have evolved. An amending Directive was published in 1997 (Directive 97/11/EC).

The primary aspects related to stakeholder engagement are linked to the EIA Directive (85/337/EEC), which includes amendments that align with the Aarhus Convention on Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention) and the Espoo Convention on EIA in a Transboundary Context (Espoo Convention).

The Aarhus Convention focuses on three key areas:

**Access to information:** ensures that the public can have a system whereby one can request and receive information, thus allowing for informed participation;

**Public participation;** provides for public participation early in decision-making on activities that can have significant environmental impact; and

**Access to justice:** ensures that the public has legal mechanisms available to review potential violations of access to information and public participation provisions.

The Espoo Convention applies in cases where there may be significant adverse transboundary impacts and requires the country from which the potential impact originates to notify the public of the affected country and to take into account comments received.

The Aarhus Espoo Conventions differ from international standards below in that the responsibility for disclosure, participation and access to justice resides with the host government and not the project sponsor. However, government representatives can only fulfil the requirements of the Conventions if a project sponsor has fully disclosed all information relating to environmental and social impacts.

### International Finance Corporation and European Bank for Reconstruction and Development

The IFC and EBRD requirements for project information disclosure are stringent and exceed the requirements of the European Union (as defined by the Aarhus Convention and Espoo Convention).

The IFC Performance Standards, the basis for the Equator Principle Financial Institutions, stress that public consultation should be started early in project development and that engagement with interested parties at every stage should be:

- “Free” (free of intimidation or coercion);
- “Prior” (timely disclosure of information); and
- “Informed” (relevant, understandable and accessible information).

Specific requirements for the IFC include:

### Stakeholder Analysis and Engagement Planning

- Identify affected communities and other stakeholders that may be interested in a Project and consider how external communications might facilitate a dialog with all stakeholders;
- Development of a SEP, including measures to allow for the effective participation of stakeholders identified as disadvantaged or vulnerable;

### Disclosure of Information

- Provision of relevant information on (i) the purpose, nature and scale of the project; (ii) duration of the proposed activities; (iii) any risks to and potential impacts on such communities and the relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism;

### Consultation

- Undertake a process of consultation that provides affected communities with opportunities to express their views on project risks, impacts and mitigation measures;
- Include a two-way process that (i) begins early in the process of identification of environmental and social impacts and continue on an ongoing basis as impacts arise; (ii) is based on prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information that is in a culturally appropriate local language; (iii) focuses inclusive engagement on those directly affected as opposed to those not directly affected; (iv) is free of external manipulation, interference, coercion, or intimidation; (v) enables meaningful participation where applicable; and (vi) is documented;
- Tailor consultation to the language preferences of the affected communities, their decision-making process and the needs of disadvantaged or vulnerable groups;

### Informed Consultation and Participation

- Conduct an Informed Consultation and Participation process that will result in affected communities' informed participation;
- Managed a consultation process that (i) captures both men's and women's views, if necessary through separate forums or engagements, and (ii) reflect men's and women's different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate.
- Document the process, in particular the measures taken to avoid or minimize risks to and adverse impacts on the affected communities, and will inform those affected about how their concerns have been considered.

### External Communications

- Implementation of a procedure for external communications that includes methods to (i) receive and register external communications from the public; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track and document responses; and (iv) adjust the environmental and social management program;

### Grievance Mechanism for Affected Communities

- Establish a grievance mechanism to receive and facilitate resolution of affected communities' concerns and grievances about the environmental and social performance;
- Inform the Affected Communities about the mechanism in the course of the stakeholder engagement process;

**Ongoing Reporting to Affected Communities**

- Provision of a schedule for periodic reports to the affected communities that describe the progress with implementation of the project action plans on issues that involved ongoing impacts on affected communities and on issues that the consultation process of grievance mechanism have identified as a concern to those communities; and
- Provision of reports not less than annually (IFC, 2012).

Similarly, EBRD requires:

- Evidence that stakeholder engagement has been free of manipulation, interference, coercion, and intimidation, and that it has been conducted on the basis of timely, relevant, understandable and accessible information;
- Stakeholder identification of individuals or groups who are i) are affected or likely to be affected by the project (affected-parties) or ii) may have an interest in the project (other interested-parties);
- Disclosure of environmental and social action plans or mitigation measures;
- Documentation of the public consultation process;
- Provision of ESIA documents in the public domain; and
- Development of a grievance mechanisms for all segments of affected communities that is available at no cost and guarantees using the mechanism will not cause retribution (EBRD, 2008).

In relation to land acquisition and easement, TANAP must facilitate a series of consultations with affected communities throughout the planning and implementation of the procedures outlined by land acquisition process. The objective of these consultations is to ensure the participation of affected parties in their own resettlement planning and implementation. In particular, the following areas require consultation:

- Assessment of project impacts;
- Economical resettlement strategy;
- Compensation rates and eligibility for entitlements;
- Development opportunities and initiatives;
- Grievance procedures and dispute resolution; and
- Methods and mechanisms for monitoring and evaluation and implementing corrective actions.

With this document, TANAP's work in Turkey is being formalized in a Stakeholder Engagement Plan, a material requirement for the EBRD, IFC and Equator Principle Financial Institutions.

The IFC and EBRD requirements to the information disclosure and stakeholder engagement exceed the Turkish and the European Union requirements. Compliance with the national requirements will be fulfilled through the implementation of the IFC and EBRD requirements.

## 3.0 Overview of Previous Engagement

### 3.0 OVERVIEW OF PREVIOUS ENGAGEMENT

Preliminary consultations conducted prior to this SEP have been aimed at informing national authorities and relevant Provincial authorities about the TANAP Project and allowing them to express their views on the Project and identify their key constraints within 2 km corridor.

During these activities, 21 Provinces along the proposed pipeline route were visited including; Ardahan, Kars, Erzurum, Erzincan, Gümüşhane, Bayburt, Giresun, Sivas, Yozgat, Kırıkkale, Kırşehir, Ankara, Eskişehir, Bilecik, Kütahya, Bursa, Balıkesir, Çanakkale, Tekirdağ, Kırklareli and Edirne. Meetings with Governors, Deputy Governors and Directors of Provincial Planning and Coordination Departments were held. The meetings were conducted jointly by representatives from Sebat Engineering (contractor of TANAP for Authority liaison, mapping, land acquisition and ground investigation services) and TANAP Doğalgaz İletim A.Ş.

A list of officials consulted of the 21 Provinces are listed in Appendix A.

Government authorities have also been engaged in writing. Official correspondence has been submitted to relevant Governorships and national authorities with 1/25,000 maps attached to show the 2 km corridor and requesting their existing and planned utilities / constraints on the corridor.

The collection of information from Governorships is ongoing. To date, replies have been received from roughly 85% of the authorities that were contacted. Replies have been registered in an Authority Register.

From late February through March 2013, TANAP conducted formal Public Participation Meetings required by Turkish EIA Legislations. In collaboration with the Provincial Directorates of Environment and Urbanisation, Sites were selected in all 21 Provinces. In addition to the required events, TANAP also held Public Participation Meetings in the other 42 districts predicted to be traversed by the preliminary route selection. Given that not all districts were within easy traveling distance to the selected 21 meetings sites, additional meetings were meant to make it easier for interested people to attend.

In total, 1,250 people attended the meetings, which were opened and chaired by Cinar on behalf of TANAP. Attendees received the Project Brochure and each meeting included a PowerPoint presentation of the Project, followed by a session for question and answers.

Preparation for all meetings included placing newspaper advertisements in national newspapers, as well as regional newspapers within each Province. All 63 district administrations were contacted directly by letter about the events and were asked to relay the invitation to the settlements within each jurisdiction.

#### 3.1 Preliminary Stakeholder Issues

Data collected from written authority responses were recorded in the Authority Register. Responses were categorized. Digital information was transferred to GIS. There have been 33 route changes requests received from authorities due to infrastructure or other elements. Routing studies are on-going on these sites. Some of the reasons for route change requests are tourism area interfaces, spatial planning issues, military sites, interface with archaeological sites and mining sites.

Public Participation Meetings have been the most extensive opportunity to date for stakeholders to share feedback on issues, concerns and questions relating to the Project.

Aside from general inquires on Project details, all of which will be considered in future disclosure of Project details, the most common topic raised in meetings related to land acquisition and easement, as well as the procedures that will regulate this process throughout the ESIA and permitting process. Many comments were on the schedule, valuation process and management responsibilities related to compensation. Numerous attendees raised the issue of land users also being considered in any compensation scheme.

Given that portions of the TANAP pipeline will be adjacent to other existing pipelines, many districts have experience with similar projects. A common issue raised in these meetings relates to legacy issues, often linked to damaged land, unclear or unfair compensation practices or damage to crops and other assets. Meeting attendees are concerned about previous poor practice and expect the TANAP Project to fulfil legal requirements and other promises. Some attendees also expressed frustration about either promises that were not fulfilled by the companies building previous pipelines or a lack of fairness in the way benefits were distributed.

The follow is a list of other important topics raised in the Public Participation Meetings:

- Local employment, including equal opportunities for all settlements along the route;
- Requests for gas distribution and improvements to supply;
- Requests for social investment and other benefits for settlements along the route;
- Water quality, particularly as it may be affected by pipeline routing;
- Agricultural impacts and potential limitations on crops after the pipeline is built;
- Waste management;
- Damage to existing roads from construction traffic;
- Contractor management;
- Security of the pipeline, as well as safety for people and animals;
- Archeological sites and their potential disturbance; and
- Health risks.

Many stakeholders asked about the possibility of gas supply in settlements through which the pipeline will pass. Because TANAP is only responsible for the transportation of natural gas, it does not have the ability to control where the commodity is sold.

All of the key issues raised by stakeholders will be considered by environmental and socio-economic specialists conducting the ESIA. The ESIA will predict negative impacts, as well as where the Project will have positive benefits. The associated management and monitoring plans will have details on the mitigation measures needed to reduce negative impacts and other policies and procedures that will try to maximise benefits, including local employment and procurement.

## 4.0 Stakeholder Identification

### 4.0 STAKEHOLDER IDENTIFICATION

Stakeholder identification is a key step in managing the overall stakeholder engagement process. It reduces the risk that a narrow stakeholder group can dominate the consultation process.

Stakeholders are defined as individuals or groups who can affect, or are affected by, or have a legitimate interest in the Project results and performance. Some stakeholders are obvious, such as government authorities responsible for permitting, local communities adjacent to the Project and other Project-affected People (PAP). Preliminary stakeholder identification intends to include other groups, organisations and individuals that may not appear to be directly involved. Health professionals and educators, for example, may not be directly involved in the Project development, but are familiar with the existing community and socio-economic dynamics and can help improve the quality of impact analysis. Such consultation is combined with baseline information collection. Consideration of feedback from such stakeholders helps to align mitigation and social investment with existing initiatives and the actual socio-economic needs.

Expanding stakeholder identification beyond government and local residents increases the likelihood that a wide representation of interests and opinions will be a priority in the development of the Project.

Stakeholders will be recorded throughout the life of the Project in the following categories:

- Governmental authorities at the national, regional and local levels;
- Multi-national and international organizations (i.e., United Nations, World Bank Group, bilateral donors, etc.);
- Non-commercial, non-governmental and public organisations particularly those with an interest in environmental and social issues at the international, national, regional and local levels;
- Interest groups, such as universities and their foundations, cooperatives, local business establishments, business associations, chambers of commerce and others (i.e., labour, youth, religious, businesses, etc.);
- PAPs including non-organised groups with particular areas of interest or that may be vulnerable (i.e., elderly, people with disabilities, ethnic minorities, etc.). PAPs include land owners and residents that may use communal land;
- Project employees; and
- Media.

A stakeholder Consultation and Grievance Database will be maintained to demonstrate the continuous efforts made to inform stakeholders in each category. The database will document stakeholders' specific interests in the Project, issues, concerns and questions raised during consultation and any grievances submitted. While the database itself will not be public, a list of stakeholders identified and consulted in the ESIA process will be included in the Consultation Report, which is to be disclosed upon completion of the ESIA.

The elements for using this system include:

#### **Stakeholder Register**

The objective is to identify project stakeholders and affiliations to better understand and address their concerns and interests through stakeholder identification, analysis and stakeholder reports.

#### **Recording of Formal Consultations / Minutes of Meeting**

This set of data will include a meeting agenda, participants' attendance, questions and answers, decisions and information disclosure, as well as management of actions and commitments.

**Complaints and Grievances Management**

For receipt and registration, reviewing and investigation, developing resolution options, response, close-out, and monitoring and evaluation of complaints and grievances.

**Commitments Management**

To registers and consolidate all commitments made by the company to stakeholders during engagement activities and enable the allocation of a responsible person to manage issues until the closure of the project.

Additional to this system, a Stakeholder Engagement Expert has been assigned to coordinate stakeholder engagement and grievance management activities during all phases of the Project and to manage the Database.

Any person or group that would like to be added to the stakeholder Database and updated on future activities should be provide to his or her contact information via the contact details in Section 7.0, Roles and Responsibilities. The Stakeholder Engagement Expert will add stakeholders to the database, and, if requested, will include these stakeholders in future efforts to disclose public information about the Project.

At this stage of the project, preliminary stakeholder identification has been conducted by TANAP through desktop review and the acquisition of public information on NGOs, government administrative units and agencies, media outlets and international organisations. The list includes a broad range of parties that could be potentially affected by the Project, to ensure that they are all considered for engagement activities. However their level of involvement in stakeholder engagement activities will vary, according to a selection of stakeholders that will be done as the process goes ahead. This level of involvement will be discussed with stakeholders themselves. Future iterations of this SEP will have an increased level of detail on particular activities needed for specific stakeholders, which will be based on feedback collected through the implementation of this plan.

Future stakeholder analysis will include the collection of details on stakeholder issues, concerns and questions. This information will be collected through group meetings, informant interviews and other data collection activities that require interaction with stakeholders and PAPs.

## 5.0 Stakeholder Engagement Program

## 5.0 STAKEHOLDER ENGAGEMENT PROGRAM

### 5.1 Integration with ESIA

The results of stakeholder engagement will be integrated into the specialist environmental and social baseline studies undertaken for the ESIA. Stakeholder issues will be considered in the ESIA and in the Project planning and design.

Stakeholder engagement during the ESIA will include a minimum of two formal periods of consultation:

- Stakeholder engagement during the pre-route corridor assessment and baseline studies, including consultation during the initial scoping site visits, and;
- Stakeholder engagement during impact assessment, including consultation on the draft ESIA report disclosure of the Project Brochure and baseline studies.

Stakeholder engagement is an underlying process that continues throughout the ESIA and beyond. The various phases of the ESIA depicted in the Figure 6 below largely correspond to the first two stages describe below, but it should be noted that the stakeholder engagement will continue into the construction and operations stages. Though there will be less activities and intensity of engagement during operation, stakeholder engagement will be a Project-long process.

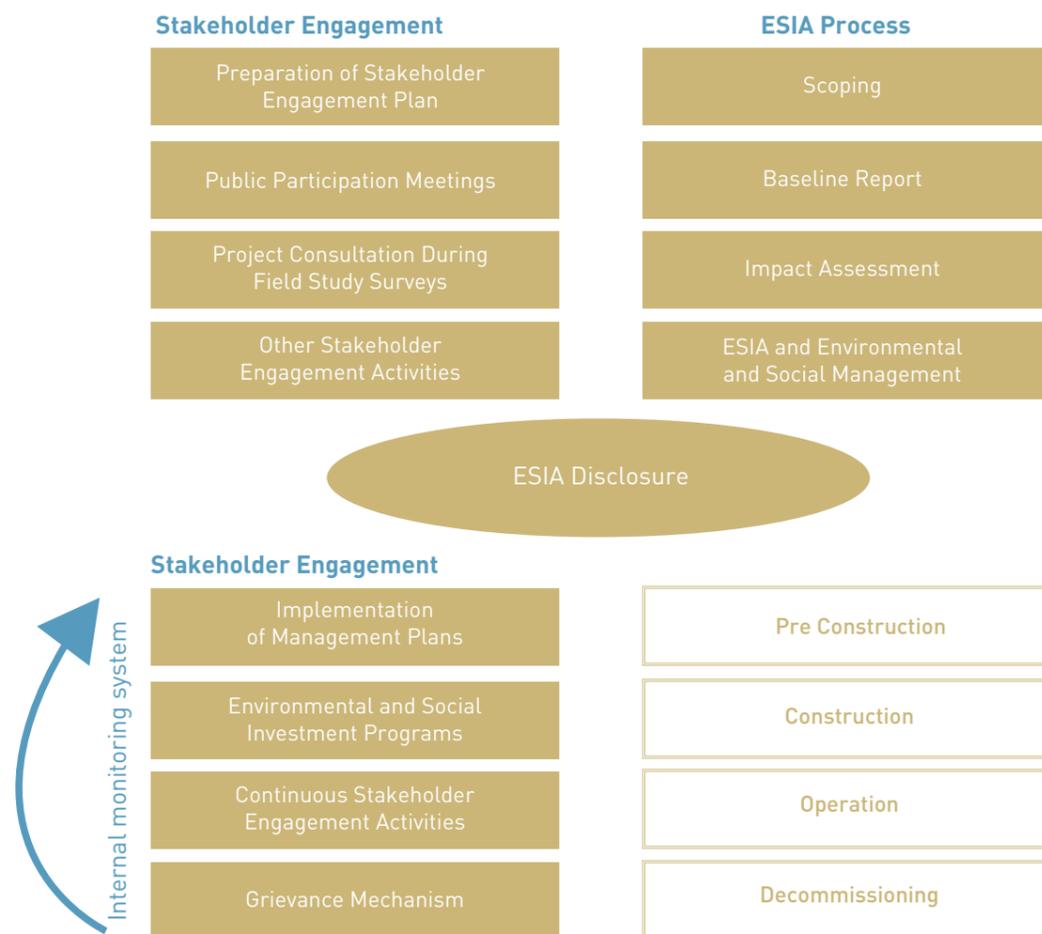


Figure 6: Diagram of the ESIA process and relationship with Stakeholder Engagement

The SEP is one of the first management plans to be developed in the Project ESIA process and is meant to be complementary to other management documents. These management documents are intended to provide clear commitments on actions meant to reduce negative impacts. At the conclusion of the ESIA process, the SEP will be included with the other management plans (like the monitoring plan chapter that will be handled in ESIA process) to form the overall Environmental and Social Action Plan required by Turkish authorities, and international financial institutions.

### 5.2 General Principles for Engagement

The following general principles will govern stakeholder engagement activities:

#### 5.2.1 Capacity building

In order to facilitate meaningful participation of stakeholders, activities aimed at education and capacity building will be followed:

- The content of documents for public comment will provide accessible and adequate information on the Project, and not create concerns (regarding potential negative impacts) or expectations (regarding potential positive impacts such as job creation, etc.);
- Written information will be accompanied by visual illustrations and explanations as needed to build understanding of the project;
- The information will be disclosed in Turkish and English if needed and in a manner that is accessible and culturally appropriate, taking into account any vulnerable people
- If key issues of particular concern arise, technical workshops may be offered to explain technical processes, assessment techniques, and quality assurance measures to verify results and ensure mitigation procedures are followed; and
- Efforts will be made to explain not only the proposed project and ESIA process, but also applicable national laws and legislations, international principles and standards and how TANAP will address compliance.

#### 5.2.2 Provision for the participation of vulnerable groups

Vulnerable groups may be defined as people that by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status may experience different or unique effects from the Project than others. International best practice encourages that individuals or groups particularly vulnerable to adverse project impacts and risks be supported to participate in the consultation process. The following measures will be implemented to enhance the ability of vulnerable stakeholder groups to participate meaningfully in the ESIA and engagement process:

- During the continued process of stakeholder identification, TANAP will identify disadvantaged or vulnerable persons or groups; and
- Staff will identify consultation approaches and activities that will support effective engagement of vulnerable persons.

### 5.3 Stages and Associated Engagement Activities

Stakeholder engagement is a continuous process that began prior to the development of this SEP and will continue through the life of the Project until decommissioning. The most active period of engagement will be during the Project development and ESIA process, when stakeholder inputs will be critical to designing the route in a way that minimises impact on the environment and communities near the pipeline.

For planning purposes, stakeholder engagement is organised in four stages:

- Stage 1: Scoping and baseline data collection
- Stage 2: ESIA disclosure
- Stage 3: Construction and operations
- Stage 4: Decommissioning and closure

#### 5.4 Methods and Activities

The following section reports the methods and activities that will be used and identifies how they will be used in the different phases of the process.

**Public Participation Meetings:** Public Participation Meetings are a key method and a requirement in national legislation. These events are held to announce and present Project information and are closely organised and implemented with government authorities.

Public Participation Meetings are carried out in compliance with Regulation on Environmental Impact Assessment, which came into effect upon publication thereof in the Official Gazette Issue No 26939 and dated 17.07.2008. Within this scope, as per Article 9 of the regulation, a series of Public Participations Meetings will be held on a dates set by the MoEU and have to be held in advance to the to the specific format determination meeting, in order to inform the public about the investment and take their views and suggestions regarding the project.

Public Participation Meetings have to be held at venues, which are easily accessible by the local people and communities, as jointly determined with the Environment and Urbanization Provincial Directorates of Ardahan, Kars, Erzurum, Erzincan, Bayburt, Gümüşhane, Giresun, Sivas, Yozgat, Kırşehir, Kırıkkale, Ankara, Eskişehir, Bilecik, Kütahya, Bursa, Balıkesir, Çanakkale, Edirne, Tekirdağ and Kırklareli.

Announcements have to be made for the Public Participation Meetings in the areas which are most likely to be affected by the Project and public notices with agenda, date and time of the meetings will be published both in national and local newspapers, at minimum 10 days before the meeting so to ensure wide participation from a large number of stakeholders. Thus, it would be possible for local people to share their comments and suggestions regarding the activity.

Public Participation Meeting will be held under the chairmanship of the Provincial Directorate of Environment and Urbanization or an executive officer to be assigned by the Directorate. The objective of the meeting is to ensure that stakeholders are informed about the project and to allow them to convey their comments, questions and suggestions. The Chairman may ask the participants to submit their comments in writing. The Minutes of the Meeting will be sent to the Ministry of Environment and Urbanisation, with a copy retained by the Governorship.

In addition, the Environmental Impact Assessment Report, that will be accomplished by the EIA Commission, will be made public in the Provincial Directorates of Environment and Urbanization and in the Ministry to receive public views and suggestions for a period of ten business days and the comments will also be taken into consideration by the Ministry during the decision making process. These comments taken from the public will also be assessed in the EIA Report.

**Consultation Meetings:** As the owner of the Project, TANAP will organise additional Consultation Meetings throughout the entire ESIA process, in addition to Public Participation Meetings organised in accordance with the MoEU as part of the national EIA process. These meetings will provide additional opportunities to inform stakeholder on the Project, and to allow comments and questions, which will be incorporated in the decision process. Meetings will be held in settlements, villages and cities affected by the Project, in order to encompass a wide array of

stakeholders. The identification of settlements where the meetings are to be held will be decided and updated as required by the social team in next phases of stakeholder engagement activities.

Meetings will have to be organised following a preliminary involvement of local authorities, such as the Muhtar, to establish operational details (time, venue, advertisement, etc.). The Muhtar or any other local authority representative may also suggest the involvement of key stakeholders and representatives, but meetings are to be open to any stakeholders. The meetings will have to be duly advertised, well in advance, through local media, bulletins, signs and posters. Brochures of the project will be left at local outlets, such as town halls, local shops to allow stakeholders to learn about the project prior to the meeting. Special attention will have to be paid to involve remote villages and communities. The venue will have to be in a central and known location, in order to facilitate participation. The meeting will be carried out by Project experts and consultants under supervision of TANAP staff. Information to be disclosed will include main technical details, timeline, objectives, risks and mitigation measures under study. The presentation will be done by showing slides and pictures of the Project and providing written material, such as brochures and fact sheets. Braille text material will also be provided if needed. At the end of the Consultation Meetings, question and answer sessions will be held to allow participants to express comments and opinions, as well as to clarify possible doubts. Participants will also be informed on communication channels and the grievance mechanism in place, to ensure that feedback from stakeholders can be sent after the meeting.

**Public Disclosure Meetings:** Public Disclosure Meetings will be linked to the disclosure of the draft ESIA and associated management documents. The format will be similar to Public Participation and Consultation Meetings, but as specifically linked to the impact assessment disclosure.

**Presentations:** All meetings listed above include PowerPoint presentations that aim to give attendees visual information and to summarise written disclosure documents.

**Letters:** Formal written correspondence is used by TANAP staff and specialist consultants as part of official permitting requirements for documentation.

**Media advertisements:** Invitations to public participation meetings and other events will be issued in newspapers and radio stations and televisions, as appropriate.

**Project Brochure:** As explained above, the Project Brochure is a communication tool that will present the Project to stakeholders. The Project Brochure is a key consultation document meant to give general information about the Project, the ESIA process, contact details for requesting more information and the grievance mechanism. The Project Brochure includes:

- Non-technical project description and schedule;
- Information on future studies for environmental and social management;
- Overview of the process for land acquisition and easement;
- Outline of stakeholder engagement activities; and
- Information on grievance mechanism.

**Corporate website:** The corporate website provides announcements, Project documents, reports and contact details for requesting more information.

**Grievance Mechanism:** Procedures for collecting and resolving grievances is an important method that will be used throughout the project. The submission of grievances will be encouraged by all staff who have contact with external stakeholders.

**Technical Workshops:** Workshops will be a method used on request from stakeholders. As and when stakeholders have specific questions that require more than written responses, TANAP will organise workshop meetings and invite stakeholders to hear presentations and speak with experts conducting studies.

**Free Hotline:** A toll free hotline - 0 800 314 11 22 - is available for any stakeholder to use. The hotline is meant to give stakeholders easy access to the company.

#### 5.4.1 Stakeholder Consultation During Baseline Information Collection

In addition to the methods and activities described in the previous section, some methods of stakeholder engagement will be conducted as part of information and data collection. Primary data and information collection often yields valuable information for the stakeholder engagement team and vice versa. The stakeholder engagement team will work closely with specialist consultants conducting the baseline and impact assessment studies. This will be especially important for those working with stakeholders in the area of influence.

**Informant interviews:** Many TANAP staff and specialist consultants will conduct informant interviews as part of the data and information collection process for the ESIA. While the primary purpose of such meetings is to complete baseline studies, such semi-structured interviews will be flexible to provide Project information and collect issues, concerns and questions that are relevant to the stakeholder engagement team.

**Focus groups:** Similar to informant interviews, focus group discussion will be conducted primarily to collect information for the ESIA. However, these small group meetings will be used as a means to provide Project information and collect stakeholder feedback.

**Baseline surveys:** Surveys will be used by many environmental and socio-economic researchers in the ESIA process. Most common will be the household and settlement surveys that will be used by the socio-economic team. These surveys aim to help characterise communities along the pipeline. The primary purpose is to collect this information for the ESIA, but each survey will allow time for discussion about the project.

**Land acquisition and easement interviews:** The process of land acquisition and easement will be the most common form of engagement. While the primary purpose is to accurately identify landowners and use that may be affected, the meetings with landowners will be used as an opportunity to disclose information and collect stakeholder feedback for those within the pipeline corridor.

**Land Rights Entity (LRE):** There will be approximately 10 offices linked to the land acquisition and easement process. TANAP will provide each office with Project information, induction trainings on the SEP and Grievance Mechanism.

#### 5.4.2 Stage 1: Scoping and baseline data collection

The purpose of stakeholder engagement during the scoping and baseline data collection phase is to make sure all stakeholder issues, questions and concerns are sufficiently considered in Project design and in the development of baseline studies to be used in impact analysis.

At this time, some of the activities have already been undertaken as part of the Pre-Route Corridor Assessment Report, which sought to characterise the entire route and select options that minimise impact in consideration of scientific, technical, environmental and socio-economic context.

Public participation meetings during this stage are a key regulatory requirement and will be conducted from the beginning of 2013 (Quarter 1) in close cooperation with the MoEU. Media announcements will be made at least 10 days prior to the meetings.

During this phase, the actual documents disclosed include, at a minimum:

- Environmental Impact Assessment Application File;
- SEP; and
- Project Brochure

The Project Brochure, a background information document, is the key document to be used by ESIA specialists and the land acquisition and easement teams. It is intended to provide sufficient information to all stakeholders, make them aware of other technical documents available and allow them to easily request technical documents as needed.

The scoping and baseline data collection phase will finish at the end of 2013 (Quarter 4).

Key activities during the scoping and baseline data collection stage are summarised in the table below:

Engagement Method	Location (if applicable)	Stakeholder Groups	Schedule
Public Participation Meetings	Provinces Along Pipeline Route	All	Q1 – Q2 2013
Consultation Meetings	Provinces Along Pipeline Route	All	Q2 – Q3 2013
Presentations	Provinces Along Pipeline Route	All	Q2 – Q3 2013
Letters	Not applicable	Governmental Authorities	Q4 2012 – Q1 2013
Media advertisements	Provinces Along Pipeline Route	All	Q1 – Q2 2013
Press Releases	Not applicable	Media	Q1 – Q4 2013
Project Brochures	Provinces, Districts and Settlements Along Pipeline Route	All	Q1 – Q4 2013
Corporate website www.tanap.com	Not applicable	All	Q1 – Q4 2013
Free Hotline	Not applicable	All	Q1 – Q4 2013
Grievance mechanism	Provinces, Districts and Settlements Along Pipeline Route	NGOs, interest groups, PAP	Q4 2012 – Q4 2013
Technical workshops	As needed and requested by stakeholders	As needed and requested by stakeholders	Q2 – Q4 2013
Informant interview	Provinces, Districts and Settlements Along Pipeline Route	All	Q4 2012 – Q4 2013
Focus groups	Districts and Settlements Along Pipeline Route	PAP	Q2 – Q4 2013
Household surveys	Districts and Settlements Along Pipeline Route	PAP	Q2 – Q4 2013
Land acquisition and easement interviews	Districts and Settlements Along Pipeline Route	PAP	Q2 – Q4 2013
LRE offices	Provinces Along Pipeline Route	PAP	Q2 – Q4 2013

#### 5.4.3 Stage 2: ESIA Disclosure

The objective of stakeholder engagement during the ESIA phase is to disclose the impact assessment findings and associated management plans. According to the Turkish EIA regulation, the draft EIA report will be disclosed publicly through the MoEU website and through MoEU provincial directorates. Moreover the standards of international financial institutions requires that final draft version of the Environmental and Social Impact Assessment Report and its management plans are disclosed to stakeholders and that stakeholder comments and questions are incorporated into the final ESIA document.

The specific methods and the number of events will be determined with appropriate government authorities and with stakeholders themselves, particularly the PAP.

- **During this phase, the actual documents disclosed include, at a minimum:**
  - Environmental and Social Impact Assessment Report;
  - Associated management and monitoring plans
  - Non-technical summary of ESIA
  - Guide to Land Acquisition and Compensation

The ESIA phase will finish in mid-2014 (Quarter 2)

Key activities of stakeholder engagement process during the ESIA stage are summarised in the table below:

Engagement Method	Location (if applicable)	Stakeholder Groups	Schedule
Public Disclosure Meetings	Provinces Along Pipeline Route	All	Q1 – Q1 2014
Media advertisements	Provinces Along Pipeline Route	All	Q1 – Q1 2014
Press Releases	Not applicable	Media	Q1 – Q1 2014
Presentations	Provinces Along Pipeline Route	All	Q1 – Q1 2014
Corporate Website www.tanap.com	Not applicable	All	Q1 – Q1 2014
Free Hotline	Not applicable	All	Q1 – Q1 2014
Grievance mechanism	Provinces, Districts and Settlements Along Pipeline Route	NGOs, interest groups, PAP	Q1 – Q1 2014
Technical workshops	As needed and requested by stakeholders	As needed and requested by stakeholders	Q1 – Q1 2014
LRE offices	Provinces and Settlements Along Pipeline Route	PAP	Q1 – Q2 2014

#### 5.4.4 Stage 3: Construction and Operations

The objective of stakeholder engagement during the construction and operations phase is to maintain links with all stakeholders to ensure that impact mitigation is being implemented as planned. The frequency of stakeholder engagement will diminish as the Project transitions from construction to operations, but key methods such as the maintenance of the grievance mechanism will be used to identify and solve any impacts or problems that were not foreseen by the ESIA and associated management planning process.

The construction and operations phase is the longest stage of the Project and will continue for the life of the pipeline. The SEP will be updated upon major project changes to reflect engagement activities that may be required during the life of the Project.

Key activities during the construction and operations stage are summarised in the table below:

Engagement Method	Location (if applicable)	Stakeholder Groups	Schedule
Consultation Meetings	Provinces Along Pipeline Route	All	At Least Monthly During Construction; at Least Annually During Operations
Presentations	Provinces Along Pipeline Route	All	At Least Monthly During Construction; at Least Annually During Operations
Media Advertisements	Provinces Along Pipeline Route	All	At Least Monthly During Construction; at Least Annually During Operations
Press Releases	Not Applicable	Media	To Be Determined
Corporate Website www.tanap.com	Not Applicable	All	To Be Determined
Free Hotline	Not Applicable	All	Ongoing Throughout Project
Grievance Mechanism	Provinces, Districts and Settlements Along Pipeline Route	NGOs, Interest Groups, PAP	Ongoing Throughout Project
Technical Workshops	As Needed and Requested by Stakeholders	As Needed and Requested by Stakeholders	To Be Determined
LRE Offices	Provinces and Settlements Along Pipeline Route	PAP	Q2 2014 – Q4 2015

#### 5.4.5 Stage 4: Decommissioning and Closure

The objective of stakeholder engagement during the decommissioning and closure phase is to reduce the impacts related to closure, especially any environmental legacy issues. No specific details of the frequency and schedule are possible now, but such details would be added during the annual revision of the SEP and when the decommissioning schedule is set. Given the preliminary estimates of construction and operations, decommissioning would not begin until 2040.

Key activities during the decommissioning and closure stage are summarised in the table below:

Engagement Method	Location (if applicable)	Stakeholder Groups	Schedule
Consultation Meetings	To Be Determined	All	To Be Determined
Presentations	To Be Determined	All	To Be Determined
Media Advertisements	To Be Determined	All	To Be Determined
Press Releases	Not Applicable	Media	To Be Determined
Corporate Website www.tanap.com	Not Applicable	All	To Be Determined
Free Hotline	Not Applicable	All	Ongoing Throughout Project
Grievance Mechanism	Provinces, Districts and Settlements Along Pipeline Route	NGOs, Interest Groups, PAP	Ongoing Throughout Project
Technical Workshops	As Needed and Requested by stakeholders	As needed and requested by stakeholders	To be determined

## 6.0 Social and Environmental Investment and Stakeholder Engagement

### 6.0 SOCIAL AND ENVIRONMENTAL INVESTMENT AND STAKEHOLDER ENGAGEMENT

As per the TANAP Cooperate Social Responsibility (CSR) Policy, a Social and Environmental Investment Programme will be implemented along the pipeline route. Further details of this Programme will be available prior to the completion of the ESIA in early 2014.

TANAP will design and implement a Social and Environmental Investment Programme in the areas affected by construction activities. The Project's Social and Environmental Investment Programmes will go beyond the social and environmental impact mitigation measures described in the ESIA Reports, and take a step further in order to meet the goal of having a positive influence in the areas in which Pipeline project operates.

The purpose of the investments is to create sustainable development for local populations, and steadily improve the quality of life during the construction and operations phase of the TANAP Project.

The Social and Environmental Investment Programme is a practical tool that will identify and describe activities and operations to reach the objectives stated above, indicating how they will be implemented among affected communities and territories. Key aspects of the Social Investment Programme include:

- Capacity Building on local development;
- Increasing economic opportunities for income and employment;
- Improving social infrastructure for economic development;
- Supporting youth and women and other vulnerable groups that may be identified as part of the socio-economic analysis conducted during the ESIA.

Social Investment Programme will support and complement mitigation measures developed in the ESIA process in order to maximise benefits to the PAP along the pipeline.

## 7.0 Roles and Responsibilities

### 7.0 ROLES AND RESPONSIBILITIES

The TANAP Project is being undertaken by the companies appointed upon a joint consortium dedicatedly constituted for this project by both countries comprise of SOCAR, and Petroleum Pipeline Corporation of Turkey (BOTAS) and Turkish Petroleum Corporation (TPAO).

The Trans Anatolian Gas Pipeline Company is responsible for project development and the TANAP Social Team will manage stakeholder engagement. Their primary responsibilities are to coordinate stakeholder engagement activities and to support the specialist consultants during their engagement during the baseline studies and impact assessment. Key specialist consultants are Cinar and Golder Associates, responsible for the national EIA and international ESIA reports respectively.

While many TANAP staff interact with external stakeholders, TANAP Social Team is responsible for documenting these interactions, and in particular, recording key meetings and consistent issues. The following are core tasks of the TANAP Social Team:

- Incorporate all stakeholder engagement activities into the overall environmental and social management systems;
- Develop an internal system to communicate progress and results of stakeholder engagement to the senior management and staff members;
- Ensure stakeholder engagement is understood by all TANAP staff members, contractors and consultants;
- Manage Public Participation Meetings and other events related to public disclosure of information;
- Ensure that all meetings, including meetings conducted by other project staff are documented ;
- Track “follow on tasks” or commitments made during all meetings, including meetings conducted by other project members through a commitments register;
- Coordination of all verbal and written communication from stakeholders, particularly comments solicited from the Project Brochure and formal grievances;
- Management and coordination of external messages, including written materials (Project Brochure, Grievance Mechanism, Social Investment Programme and others, as needed);
- Frequent coordination with external consultants and contractors to ensure technical, environmental and other studies are summarised appropriately for all stakeholders;
- Frequent coordination with staff or external partners responsible for Social Investment Programme to ensure social investment is summarised appropriately for all stakeholders; and
- Support to other staff that may have interaction with stakeholders, especially if other staff members become aware of problems with local communities or other stakeholder groups.

Contact details to liaise with TANAP are indicated below:

**Address:** P.K. 106040 Ulus / ANKARA - Turkey

**Toll Free Number:** +90 800 314 11 22

**Phone Number:** +90 312 999 11 11

**Email Address:** info@tanap.com

**Corporate website:** www.tanap.com

# 8.0 Grievance Mechanism

## 8.0 GRIEVANCE MECHANISM

### 8.1 Purpose and Scope

The purpose of a grievance mechanism is to demonstrate responsiveness to stakeholder needs. A clear and widely publicised grievance mechanism improves stakeholder management by ensuring the grievances are documented in writing and clearly understood. All stakeholders are encouraged to submit written grievances and should be reassured that written submissions will not be used in any way to intimidate those submitting the complaints.

Key elements of a grievance mechanism include:

- Clear instructions on how grievances are submitted and handled after submission, including a minimum period that a stakeholder must wait to receive a reply; and
- Alternatives for submitting a grievance in person to a staff member if a stakeholder is not able to or comfortable submitting a grievance in writing.

### 8.2 Responsibilities

TANAP Social Team is responsible for coordination of stakeholder engagement activities and the management of the grievance procedure. TANAP Social Team does not have the authority to resolve grievances, but rather works with a team of managers to collect accurate information about a given issue, to share it with appropriate senior management, and to communicate the resolution back to the person submitting the grievance.

### 8.3 Procedure

The Grievance Mechanism is a management procedure through which communities and individuals affected by TANAP's activities can formally communicate their concerns, complaints and grievances to the company and facilitate resolutions that are mutually acceptable by the parties, within a reasonable timeframe. The grievance mechanism is a management tool designed to help address stakeholder concerns and facilitate a trustworthy and constructive relationship.

A Grievance and Dispute Resolution Procedure is followed up by TANAP to manage the community concerns through active and transparent engagement with stakeholders. As part of the procedure, a toll free number (+90 800 314 11 22) was set up and a Complaint Register Form (CRF) is prepared for the complaints log and the registered complaints will be inserted to TANAP central complaints database.

Management of the complaints will be followed up through this system and reported as specified in the Complaint Management Procedure.

Steps of the management of the complaints are as below;

- Receiving and registering of the complaints - 2 business days
- Assessment and investigation of the complaint - 10 business days
- Resolution of the complaint
- Response to the complainant within - 30 business days
- Close out of the complaint



Grievances may be submitted in writing or verbally through staff of the project to the TANAP Social Team that will put the grievance in writing for management purposes.

Other aspects include:

- All formal grievances will receive a formal reply within two weeks (10 working days) unless indicated otherwise in the grievance itself. The formal response will provide additional information or, if appropriate, further instructions on proposed measures to resolve the issues;
- All grievances will be documented. The importance of documenting all grievances is to make sure problems are accurately understood and handled appropriately;
- Written submissions will not be used in any way to intimidate the person or organisation submitting the complaint;
- As a general rule, names of persons submitting a grievance will be kept confidential unless a grievance is made in a public meeting;
- TANAP aims to resolve complaints within 30 business days and closure form should be attached as a background document.
- Grievances received anonymously will be treated as comments or issues and recorded, but no formal response will be issued; and
- While efforts will be made to resolve all grievances amicably, if a grievance cannot be resolved, TANAP will seek to involve other external experts, neutral parties or local and regional authorities, as necessary.
- The grievance procedure may be used by anyone at no cost and without any fear of retribution.

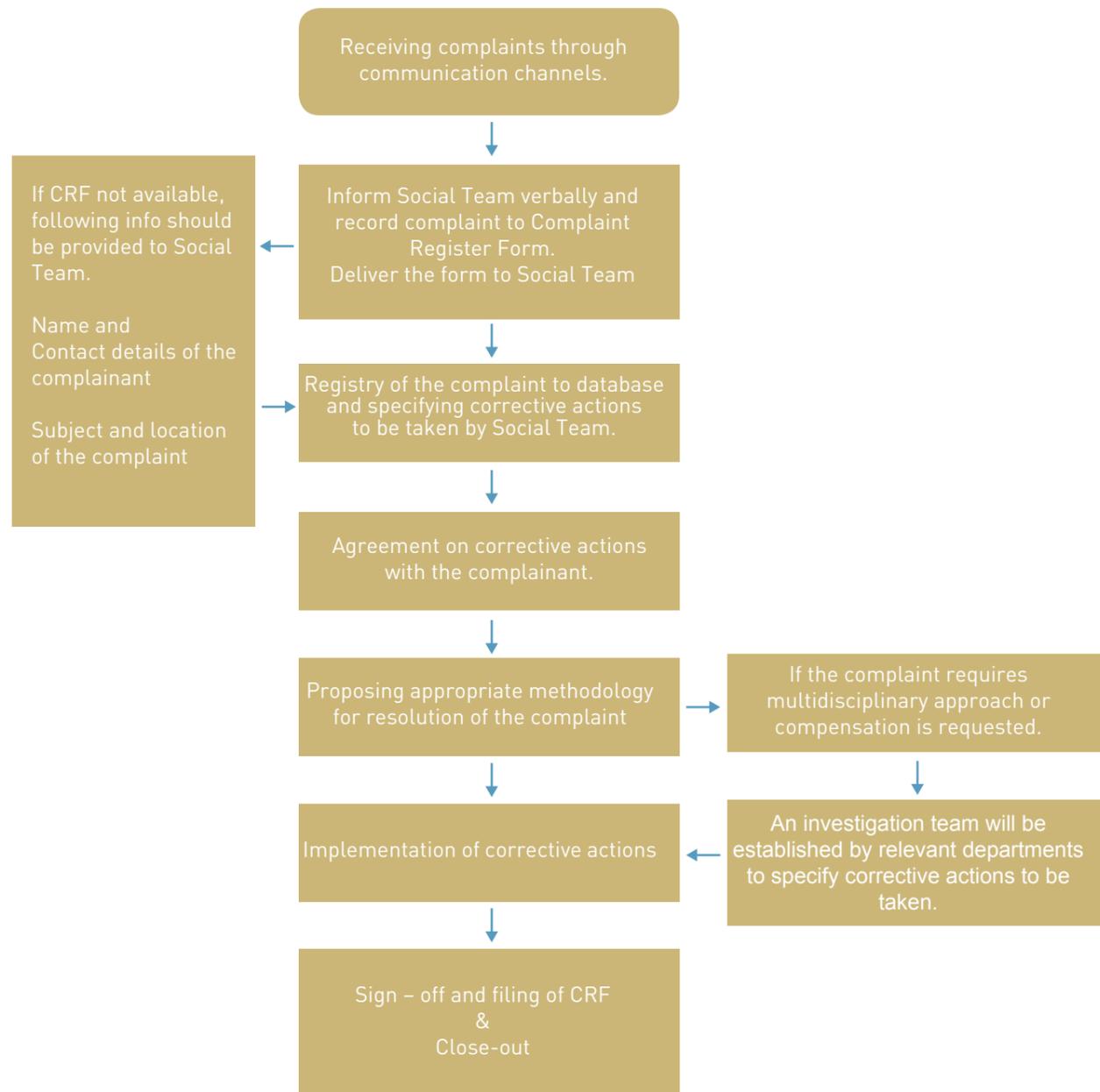
Written grievances may be submitted with the Complaint Register Form (0) or by including the following information in a letter or e-mail:

- Name;
- Organisation and position, if relevant;
- Address;
- Telephone/Fax and e-mail;
- Most effective means to send a response; and
- Details of the grievance (any important details; date of the incident, location, etc.)

The procedure for handling complaints is provided in following flowchart.

## 9.0 Grievance Mechanism Flowchart

### 9.0 Grievance Mechanism Flowchart



## 10.0 Monitoring, Evaluation and Reporting



## 10.0 MONITORING, EVALUATION AND REPORTING

A process of establishing monitoring criteria is in an initial phase of development. The results to be analyzed will provide background for planning better initiatives for the implementation and closure of the project phases.

Throughout the project life, TANAP will maintain communication channels with relevant stakeholders as identified. Any additional stakeholders identified during the life of the Project will also be added to the stakeholder Database and communication with them will be initiated. In case of significant changes or updates regarding the project, environmental and social issues will continue to be addressed and reported to the stakeholders. Improvements, upgrades and all environmental and social issues will be timely communicated via the methods outlined in Section 5 of this SEP.

The SEP will be updated periodically and upon major project changes. Updates will provide brief summaries of issues, concerns and questions raised during the previous year, as well as information on any changes between planned activities and the activities and events actually held.

Results of grievances will be summarised on an annual basis to demonstrate the types of issues managed in the process, as well as the number of grievances received, closed and number remaining open. Results will also include the number of grievances that were not solved through internal procedures and that may have included third party or legal resolution.

All stakeholders should be confident that reporting on grievances will protect confidentiality.

As explained throughout the SEP, stakeholder engagement is an underlying process that informs the on-going environmental and social management processes. The SEP will regularly list environmental and social reports that have been prepared and disclosed to the public. This process will be overseen by the TANAP Social Team and Community Liaison Officers (CLOs), who will be appointed before the construction phase begins.

The reporting commitments related to stakeholder engagement will take place during the periodic disclosure of environmental and social performance information. This reporting will take place at least one time year. The exact schedule for the reporting will be determined at the completion of the ESIA and start of construction.

## 11.0 Referances



## 11.0 REFERENCES

EBRD, 2008. Environmental and Social Policy. London, UK.

IFC, 2007. Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets. Washington, D.C., USA.

IFC, 2012. Performance Standards on Environmental and Social Sustainability. Washington, D.C., USA.

### Report Signature Page

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Registro Imprese Torino  
società soggetta a direzione e coordinamento di Enterra Holding Ltd. Ex art. 2497 c.c.

# Appendix A

## APPENDIX A

### Government authorities consulted during preliminary consultation

During preliminary stakeholder engagement, 21 Provinces along the proposed pipeline route were visited. Meetings with Governors, Deputy Governors and Directors of Provincial Planning and Coordination Departments were held. The meetings were conducted jointly by representatives from Sebat Engineering (contractor of TANAP for Authority liaison, mapping, land acquisition and ground investigation services) and TANAP Doğalgaz İletim A.Ş.

A list of officials consulted of the 21 Provinces are listed below:

- Governorship of Ardahan (Provincial Directorate of Environmental and Urban Planning), date of PPM: 4th March;2013
  - Governorship of Ardahan (Provincial Directorate of Public Health);
  - Governorship of Ardahan (Provincial Directorate of Food Agriculture and Livestock);
  - Governorship of Ardahan (Secretary General of Special Provincial Administration);
- Governorship of Kars (Provincial Directorate of Environmental and Urban Planning), date of PPM: 4th March 2013;
  - Governorship of Kars (Provincial Directorate of Public Health);
  - Governorship of Kars (Provincial Directorate of Food Agriculture and Livestock);
  - Governorship of Kars (Secretary General of Special Provincial Administration);
- Governorship of Erzurum (Provincial Directorate of Environmental and Urban Planning), date of PPM: 5th March 2013;
  - Governorship of Erzurum (Provincial Directorate of Public Health)
  - Governorship of Erzurum (Provincial Directorate of Food Agriculture and Livestock)
  - Governorship of Erzurum (Secretary General of Special Provincial Administration)
- Governorship of Erzincan (Provincial Directorate of Environmental and Urban Planning), date of PPM: 7th March 2013;
  - Governorship of Erzincan (Provincial Directorate of Public Health);
  - Governorship of Erzincan (Provincial Directorate of Food Agriculture and Livestock);
  - Governorship of Erzincan (Secretary General of Special Provincial Administration);
- Governorship of Bayburt (Provincial Directorate of Environmental and Urban Planning), the date of PPM: 5th March;
  - Governorship of Bayburt (Provincial Directorate of Public Health);
  - Governorship of Bayburt (Provincial Directorate of Food Agriculture and Livestock);
  - Governorship of Bayburt (Secretary General of Special Provincial Administration);
- Governorship of Gümüşhane (Provincial Directorate of Environmental and Urban Planning), date of PPM, 6th March 2013;
  - Governorship of Gümüşhane (Provincial Directorate of Public Health);
  - Governorship of Gümüşhane (Provincial Directorate of Food Agriculture and Livestock);
  - Governorship of Gümüşhane (Secretary General of Special Provincial Administration);
- Governorship of Giresun (Provincial Directorate of Environmental and Urban Planning) the date of PPM: 6th March 2013;
  - Governorship of Giresun (Provincial Directorate of Public Health);
  - Governorship of Giresun (Provincial Directorate of Food Agriculture and Livestock);
  - Governorship of Giresun (Secretary General of Special Provincial Administration);
- Governorship of Sivas (Provincial Directorate of Environmental and Urban Planning); the date of PPM: 7th March 2013;
  - Governorship of Sivas (Provincial Directorate of Public Health);
  - Governorship of Sivas (Provincial Directorate of Food Agriculture and Livestock);
  - Governorship of Sivas (Secretary General of Special Provincial Administration);
- Governorship of Yozgat (Provincial Directorate of Environmental and Urban Planning), the date of PPM: 8th March 2013;
  - Governorship of Yozgat (Provincial Directorate of Public Health);
  - Governorship of Yozgat (Provincial Directorate of Food Agriculture and Livestock);
  - Governorship of Yozgat (Secretary General of Special Provincial Administration);
- Governorship of Giresun (Provincial Directorate of Environmental and Urban Planning) the date of PPM: 6th March 2013;
  - Governorship of Giresun (Provincial Directorate of Public Health);
  - Governorship of Giresun (Provincial Directorate of Food Agriculture and Livestock);
  - Governorship of Giresun (Secretary General of Special Provincial Administration);
- Governorship of Sivas (Provincial Directorate of Environmental and Urban Planning); the date of PPM: 7th March 2013;
  - Governorship of Sivas (Provincial Directorate of Public Health);
  - Governorship of Sivas (Provincial Directorate of Food Agriculture and Livestock);
  - Governorship of Sivas (Secretary General of Special Provincial Administration);
- Governorship of Yozgat (Provincial Directorate of Environmental and Urban Planning), the date of PPM: 8th March 2013;
  - Governorship of Yozgat (Provincial Directorate of Public Health);
  - Governorship of Yozgat (Provincial Directorate of Food Agriculture and Livestock);
  - Governorship of Yozgat (Secretary General of Special Provincial Administration);

- Governorship of Kırşehir (Provincial Directorate of Environmental and Urban Planning), the date of PPM: 8th March 2013;
- Governorship of Kırşehir (Provincial Directorate of Public Health);
- Governorship of Kütahya (Provincial Directorate of Food Agriculture and Livestock);
- Governorship of Kütahya (Secretary General of Special Provincial Administration);
- Governorship of Bursa (Provincial Directorate of Environmental and Urban Planning), the date of PPM: 27th February 2013;
- Governorship of Bursa (Provincial Directorate of Public Health);
- Governorship of Bursa (Provincial Directorate of Food Agriculture and Livestock);
- Governorship of Bursa (Secretary General of Special Provincial Administration);
- Governorship of Balıkesir (Provincial Directorate of Environmental and Urban Planning), the date of PPM: 27th February 2013;
- Governorship of Balıkesir (Provincial Directorate of Public Health);
- Governorship of Balıkesir (Provincial Directorate of Food Agriculture and Livestock);
- Governorship of Balıkesir (Secretary General of Special Provincial Administration);
- Governorship of Çanakkale (Provincial Directorate of Environmental and Urban Planning), the date of PPM: 26th February;
- Governorship of Çanakkale (Provincial Directorate of Public Health);
- Governorship of Çanakkale (Provincial Directorate of Food Agriculture and Livestock);
- Governorship of Çanakkale (Secretary General of Special Provincial Administration);
- Governorship of Edirne (Provincial Directorate of Environmental and Urban Planning), the date of PPM: 26th February;
- Governorship of Edirne (Provincial Directorate of Public Health);
- Governorship of Edirne (Provincial Directorate of Food Agriculture and Livestock);
- Governorship of Edirne (Secretary General of Special Provincial Administration);
- Governorship of Tekirdağ (Provincial Directorate of Environmental and Urban Planning), the date of PPM: 25th February 2013;
- Governorship of Tekirdağ (Provincial Directorate of Public Health);
- Governorship of Tekirdağ (Provincial Directorate of Food Agriculture and Livestock);
- Governorship of Tekirdağ (Secretary General of Special Provincial Administration);
- Governorship of Kırklareli (Provincial Directorate of Environmental and Urban Planning) the date of PPM: 25th February 2013;
- Governorship of Kırklareli (Provincial Directorate of Public Health);
- Governorship of Kırklareli (Provincial Directorate of Food Agriculture and Livestock);
- Governorship of Kırklareli (Secretary General of Special Provincial Administration);
- Erzurum Metropolitan Municipality;
- Eskişehir Metropolitan Municipality;
- Bursa Metropolitan Municipality.

## Appendix B

Previous Engagement Activity Material

# Appendix C

## APPENDIX C

### Complaint Register Form

		<b>TANAP</b> TRANS ANATOLIAN NATURAL GAS PIPELINE PROJECT	
		Complaint Register Form / Şikayet Kayıt Formu	
Şikayetin Alındığı Yer / Location of Complaint Received		Tarih / Date:	
Alan Yetkilisinin Adı / Name of Person Incharge:		Şikayet Kayıt No/Complaint Register Number	
Şikayete Konu Alanın Koordinatları / Coordinates of the area subject to complaint : (UTM ED 50)			
Arazi Parsel numarası (Şikayet arazi konulu ise) / Land Parcel Number (If complaint is related to land)			
<b>1 - ŞİKAYET SAHİBİ HAKKINDA BİLGİ / 1 - COMPLAINANT INFO</b>			
Ad Soyad / Name Surname :		Şikayetin Geliş Yolu / Form of Complaint :	
T.C. Kimlik No / Identification Number		<input type="checkbox"/> Telefon-Ücretsiz Hat / Phone-Free Phone Line	
Telefon / E-posta Telephone / E-mail :		<input type="checkbox"/> Halk Toplantısı / Community Meeting	
Adres / Address:		<input type="checkbox"/> Dilekçe / Petition	
Köy - İlçe - İl Village -District -Province:		<input type="checkbox"/> Diğer (Açıklayın) / Other (Specify)	
<b>2 - ŞİKAYET DETAYLARI / 2 - DETAILS OF COMPLAINT</b>			
Şikayeti Açıklayın / Define The Complaint :			
Şikayet sahibi tarafından talep edilen çözüm / Solution requested by the complainant :			
Kayıt eden kişinin ad soyad ve imzası / Name Surname and Signature of the Registerer		Şikayet Sahibinin ad soyad ve imzası / Name Surname and Signature of the Complainant	
TNP-SOC-FRM-002 Rev.1			







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