



Midia Gas Development FEED Study

Stakeholder Engagement Plan (SEP)

Black Sea Oil & Gas SRL

Assignment Number: A200283-S00

Document Number: A-200283-S00-A-REPT-009

Client Document Number: MGD-D-EN-REP-009-D02

Xodus Group
Xodus House, 50 Huntly Street
Aberdeen, UK, AB10 1RS

T +44 (0)1224 628300
E info@xodusgroup.com
www.xodusgroup.com



Stakeholder Engagement Plan

A200283-S00

Client: Black Sea Oil & Gas SRL

Document Type: Report

Document Number: A-200283-S00-A-REPT-009

Client Document Number: MGD-D-EN-REP-009-D02

A02	11/05/2017	Re-Issued for Use	Green Partners	AW	AW	
A01	05/04/2016	Issued for Use	Green Partners	FP	AW	
R01	24/02/2016	Issued for Review	Green Partners	AW	AW	-
Rev	Date	Description	Issued By	Checked By	Approved By	Client Approval



CONTENTS

ABBREVIATIONS AND ACRONYMS	4
1 INTRODUCTION	5
1.1 Scope and Objectives of the Stakeholder Engagement Plan	5
1.2 Brief Project Description	6
1.2.1 Ana offshore wellhead platform, including topsides and substructure	7
1.2.2 Subsea infrastructure including Doina subsea facilities, Ana-Doina infield pipeline and pipeline to shore, including beach crossing	7
1.2.3 Gas Treatment Plant and associated onshore pipeline linking the beach crossing to the GTP	7
2 REGULATIONS AND REQUIREMENTS	9
2.1 National Requirements	9
2.2 European Bank for Reconstruction and Development (EBRD) Requirements	10
3 STAKEHOLDER IDENTIFICATION AND MAPPING	12
4 STAKEHOLDER ANALYSIS	14
5 PREVIOUS ENGAGEMENT ACTIVITIES	16
6 STAKEHOLDER ENGAGEMENT PLAN	18
6.1 Action Plan	18
6.2 Record keeping	21
7 GRIEVANCE MECHANISM	22
8 MONITORING AND EVALUATION	25
APPENDIX A CONTACT LIST – GRIEVANCE MECHANISM	27



ABBREVIATIONS AND ACRONYMS

Abbreviation or Acronym	Definition
Aarhus Convention	The Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, signed in Aarhus on 25 June 1998.
BSOG	Black Sea Oil & Gas
DDBRA	Danube Delta Biosphere Reserve Administration
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EPA	Environmental Protection Agency
EU	European Union
ESIA	Environmental and Social Impact Assessment
FEED	Front End Engineering Design
GTP	Gas Treatment Plant
LPA	Local Public Authorities
MEG	Monoethylene glycol
MGD/MGD Project	Midia Gas Development/Midia Gas Development Project
NGO	Non-Governmental Organisation
NTS	National Gas Transmission System
PIU	Project Implementation Unit
PR	Performance Requirement
SEP	Stakeholder Engagement Plan
TEG	Triethylene glycol
TRANSGAZ	National Gas Transmission Company



1 INTRODUCTION

1.1 Scope and Objectives of the Stakeholder Engagement Plan

Stakeholder engagement is a key element in building strong, constructive and responsive relationships which are essential for the successful management of a project's environmental and social risks and impacts. It aims to inform stakeholders about the potential environmental and social impacts related to the project through appropriate disclosure of information, to ensure their perceptions of the proposed development are as accurate as possible, to consult with them to obtain feedback, and to provide a mechanism for resolving any concerns or complaints they might have.

The Stakeholder Engagement Plan (SEP) is a guiding document that maps the main categories of stakeholders who need to be meaningfully engaged within the development and implementation of a project. It focuses on:

- > Identification of stakeholders who are likely to be affected by the project;
- > Establishment of engagement methods that are suitable for each identified category of stakeholder;
- > Documentation of previous engagement activities and stakeholder feedback;
- > Development and implementation of the Stakeholder Engagement Action Plan;
- > Introduction of the project's grievance mechanism; and
- > Monitoring and evaluation of engagement actions.

This SEP is prepared in relation to the Midia Gas Development (MGD) Project which is currently in the process of being worked up and implemented by Black Sea Oil & Gas SRL (BSOG). It sets out the planned programme for disclosure of project information and consultation with stakeholders, as well as the methods for recording and addressing comments and grievances from various stakeholders.

While the local regulatory framework in Romania only requires an Environmental Impact Assessment (EIA), the project's initiator, BSOG, has decided to examine the social implications of MGD as per best international practice. In light of the planned Environmental and Social Impact Assessment (ESIA) process, this document establishes the basis of the stakeholder engagement programme for the whole project. BSOG is committing to support all the engagement activities included in the SEP and to allocate sufficient resources (human and financial) in order to ensure its implementation.

The SEP is a 'live' document that will be progressively developed through updated versions in line with the phases of the MGD Project. The SEP will be made publicly available on BSOG's website and will also be made accessible to local communities as part of the project information disclosure policy and programme as described below.

BSOG and the Project Implementation Unit (PIU) will respect individual stakeholders' Right to Privacy which is relevant to this SEP in regards to information relating to personal or private affairs and the protection of communications, including grievances.

Note that the current version of SEP has been developed during the Environmental and Social Impact Assessment (ESIA) development process so that stakeholder feedback can be considered when identifying potential impacts and concerns (during the scoping phase) and determining the various impact control and mitigation actions during the ESIA preparation phase. As far as reasonably practicable, the project's Environmental and Social Action Plan will seek to establish suitable and sufficient impact mitigation measures that reflect such feedback. Upon finalisation of the socio-economic baseline, there will be an update of the SEP to take account of the new information.



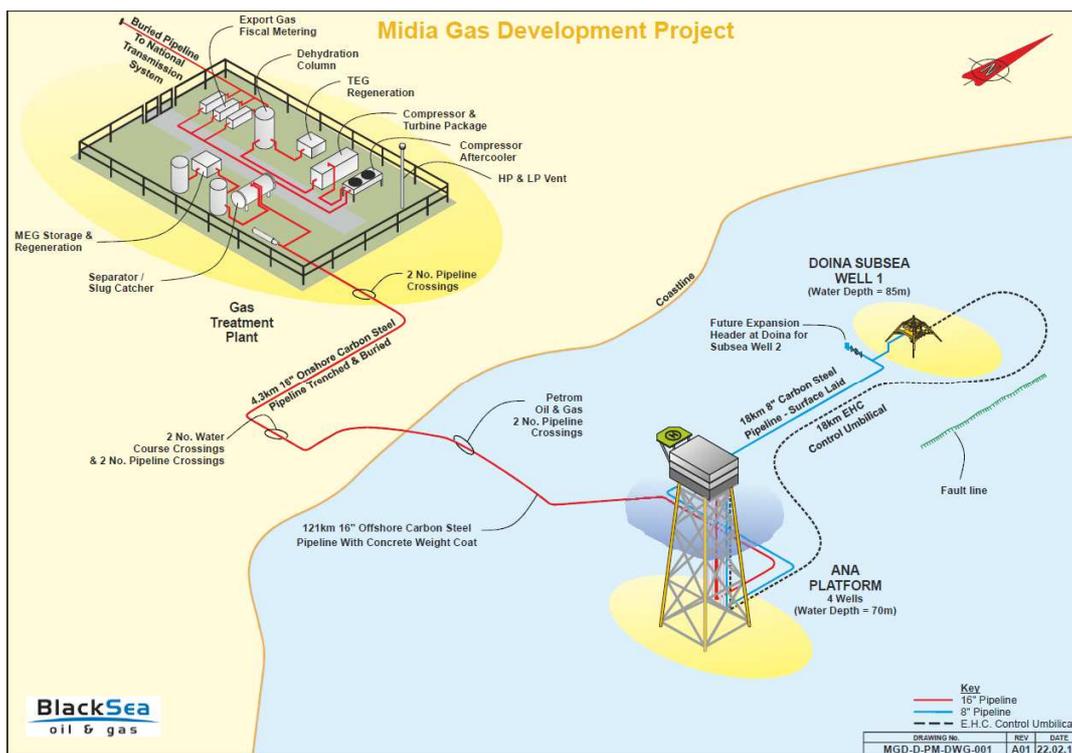
1.2 Brief Project Description

BSOG is the titleholder (together with Petro Ventures Europe B.V. and Gas Plus International B.V.) and operator of the Concession Agreement for Petroleum Exploration, Development and Production in Blocks XIII Pelican and XV Midia, Contract Area B, located on the continental shelf of the Romanian Black Sea.

The Midia Gas Development (MGD) Project consists of the design and construction of the offshore facilities for the production of gas from the Ana and Doina Discoveries, located in XV Midia Block, a production pipeline and a Gas Treatment Plant (GTP). The Project will produce and process gas from the Ana and Doina discoveries and will route it to export to consumers within Romania and/or European Union (EU).

An 18 km pipeline will route production from subsea well(s) at the Doina field location to a new (normally) unmanned platform at the Ana field location. A 121 km pipeline will then route the combined production from the Ana and Doina fields from the Ana platform to the shoreline, where an approximately 4.3 km pipeline (of which 4.1 km is onshore, on BSOG land) will connect to the new GTP. MGD will be connected to the National Gas Transmission System (NTS) through an approximately 25 km export pipeline to be built by TRANSGAZ (the National Gas Transmission Company) as a development of the NTS.

The concept of the MGD Project is presented in Figure 1.1.



Source: Black Sea Oil & Gas

Figure 1-1 Concept for the Midia Gas Development Project



The Project is divided into three packages as described below.

1.2.1 Ana offshore wellhead platform, including topsides and substructure

The facilities at the Ana wellhead platform comprise:

- > 4 x platform wells;
- > pipework fully rated to well closed in tubing head pressure;
- > cold vent;
- > helideck;
- > chemical storage and injection pumps for mono ethylene glycol (MEG);
- > temporary refuge/equipment room;
- > lifeboat;
- > facilities to enable temporary installation of pig receivers and pig launchers;
- > crane; and
- > minimal ancillary facilities.

1.2.2 Subsea infrastructure including Doina subsea facilities, Ana-Doina infield pipeline and pipeline to shore, including beach crossing

The facilities for the offshore subsea infrastructure are:

- > Doina: Up to 2 × subsea wells in a daisy chain arrangement controlled via an electro-hydraulic-chemical umbilical from the Ana platform (initial development is 1 x Doina subsea well);
- > Doina to Ana infield pipeline: 8-inch carbon steel pipeline with no concrete coating, continuously inhibited against hydrates with MEG;
- > Ana to shore pipeline: 16-inch steel pipeline with a concrete coating for stability, continuously inhibited against hydrates with MEG; and
- > Beach crossing: trenched beach crossing using cofferdams (base-case option).

The offshore pipeline will cross: Natura 2000 areas of ROSCI (Romanian Site of Community Importance) 0066 Danube Delta - marine area; and ROSPA (Romanian Special Protection Area) 0076 Black Sea, as well as the economic area of the Danube Delta Biosphere Reserve (in Romanian: "Rezervația Biosferei Delta Dunării").

The offshore pipeline will undercross a crude oil pipeline and a natural gas pipeline owned by OMV Petrom SA.

1.2.3 Gas Treatment Plant and associated onshore pipeline linking the beach crossing to the GTP

The facilities required for the onshore pipeline and GTP are:

- > Trenched and buried 16-inch carbon steel pipeline, continuously inhibited against hydrates with MEG; and
- > Gas Treatment Plant: pig receiver, slug catcher/separator, single stage turbine driven compressor (with scrubber and air cooled after cooler), triethylene glycol (TEG), dehydration of gas, fiscal metering, MEG regeneration and storage, control room, power generation, utilities, cold vent, etc.



The onshore pipeline will cross the non-built-up area of the Administrative Unit of Corbu Commune located in Constanta County. Two settlements are in proximity to the Project (Corbu Village and Vadu Village). Vadu is the nearest settlement, located approximately 1.9 km from the GTP.

The onshore pipeline will cross: Natura 2000 areas of ROSCI 0065 Danube Delta; ROSPA 0031 Danube Delta and Razim-Sinoe Complex; ROSPA 0076 Black Sea, as well as the economic area of the Danube Delta Biosphere Reserve (*Rezervația Biosferei Delta Dunării*).

Also, the ROSPA 0066 Tasaul and Cobu lakes area is located approximately 6.5 km from the GTP.

The pipeline right-of-way will comprise a 20 m width on each side, extended to 22.75 m in the inflexion points. The protection zone will have a width of 6.3 m on each side.

The onshore 16-inch steel pipeline will be buried to a minimum depth of 1.1 m. Exceptions will be made when crossing roads, where the pipeline will be buried to a minimum depth of 1.5 m, and when crossing wetlands where the depth will be 2 m. Wetlands crossing will be made by open trench or by micro-tunnelling. Five exploitation roads will be crossed by the pipeline: De 539/80, De 539/79, De 539/78, De 522/9 and De 265.

The onshore pipeline will undercross a crude oil pipeline and a natural gas pipeline owned by OMV Petrom SA. Also, the onshore pipeline will cross two Rompetrol wastewater pipelines and the Balta Mare and Balta de Mijloc wetlands.

The main characteristics of the onshore pipeline are presented in Table 1.1.

Item	Measurement unit	Size
Pipeline outside diameter	mm	406.4
Thickness of the pipeline	mm	9.1 (minimum)
Designed pressure	barg	110
Maximum operation pressure	barg	105
Total length of the onshore pipeline including beach crossing	km	4.3

Table 1-1 Main characteristics of the onshore pipeline



2 REGULATIONS AND REQUIREMENTS

2.1 National Requirements

At national level, there are no specific requirements for preparing a dedicated Stakeholder Engagement Plan. Nevertheless, some provisions for stakeholder engagement are included in several regulations and procedures, including:

- > The Romanian Constitution, which stipulates in article 31 (1) that “a person's right of access to any information of public interest cannot be restricted” and in article 31 (2) that “the public authorities, according to their competence, shall be bound to provide for correct information of the citizens in public affairs and matters of personal interest”;
- > Law no. 86/2000, for ratification of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, signed in Aarhus on 25 June 1998 (Aarhus Convention).
- > Law no. 544 of October 12th, 2011 regarding the free access to information of public interest, which defines and details the free access of any person to any piece of information of public interest, which, as a general principle, constitutes one of the fundamental principles of the relationship between citizens and public authorities in accordance with the Constitution of Romania and with the international undertakings ratified by the Parliament of Romania. Law 544/2011 stipulates further that the public authorities or institutions will ensure that access to information of public interest shall be done ex officio or upon request, through the intermediary of the department for public relations or through the intermediary of the person appointed for this purpose.
- > Governmental Decision no. 878/2005 on right to access to environmental information transposes EU Directive 2003/4/CE from 28 January 2003 (on right to access to environmental information and repealing the Directive no. 90/313/CEE), and ensures the right to access environmental information held by or for the public authorities and sets out the conditions, general terms and ways to exercise that right.
- > Emergency Government Ordinance no. 195/2005, related to the environmental protection, as amended from time to time, clearly stipulates in article 5 that the state recognizes the right of any person to an “ecologically healthy and balanced environment” and for this purpose, the state warrants, *inter alia*, free access to environment related information, including the right of any person to be consulted during a process of making environment-related decisions (i.e. legislation, plans and programs) and the right to access to justice.
- > Further, article 20 of Emergency Government Ordinance no. 195/2005 clearly stipulates that the Competent Authority for Environmental Protection together with all other local and central public authorities, if the case, will ensure proper access to information, participation of the public in specific activities related to decisions and access to justice in accordance with the requirements of the Aarhus Convention;
- > Governmental Decision no. 445/2009 on environmental impact assessment pertaining to certain public and private projects. In accordance with the stipulations of G.D. no. 445/2009, the relevant information has to be made publicly available by the Investor and/or the National Authorities during each of the EIA stages listed in article 6 of G.D. no. 445/2009. Public Consultations and open disclosure of documentation connected with the Project have to be carried out and financed by the Investor in close connection with the guidance given by the relevant authority and consistently with the requirements of the relevant Romanian legislation (see in this respect, art. 16 of G.D. no. 445/2009).
- > Order no. 135/84/76/1.284/2010 - Methodology for Environmental Impact Assessment for Public and Private Projects (Order no. 1284/2010), a joint document issued by the Ministry of Environment and Forests, Ministry of Administration and Internal Affairs, Ministry of Agriculture



and Rural Development and Ministry of Regional Development and Tourism, as published in the Official Gazette no. 274/24.04.2010. Order no. 1284/2010 details the necessary stages for the performance of the EIA procedure, as listed in article 6 of G.D. 445/2009. In this context, Order no. 1284/2010 contains very specific and detailed information on the timing of disclosure of the relevant documents, the method of involving of the interested public, the organisation of public consultation meetings, including but not limited to the way of taking account of the comments raised/amendments proposed by the interested public, for the final EIA documentation (to be approved by NEPA).

- > Order no. 2701/2010 - Methodology regarding the mechanism of information and consultation of the public on the occasion of preparing or revising the zonal planning and urbanism plans enacted by the Ministry for Regional Development and Tourism (published in the Official Gazette no. 47/January 19, 2011), which provides the legal framework for performing the information disclosure and public consultation as a prerequisite for approving any urbanism and zonal planning documents.
- > Law 52/2003 on decisional transparency in public administration – the law has the role to enhance the accountability of government to the citizen and the beneficiary of the administrative decision, and to increase the involvement of citizens in decision-making processes of the administrative and legislative drafting process, to enhance transparency across government.
- > Order No. 863/2002 on approval of the methodological guidelines applicable to the stages of the environmental impact assessment procedure.
- > Law 185/2016 on the necessary steps for the implementation of projects of national importance in the field of natural gas – the law clearly sets out the way in which people and land owners are to be engaged during the development and implementation of an oil and gas project.

2.2 European Bank for Reconstruction and Development (EBRD) Requirements

According to the EBRD, stakeholder engagement is important for building strong, constructive and response relationships with all interested and impacted persons/institutions. EBRD's Performance Requirement 10 (PR10) states that national laws and regulations regarding public information disclosure and consultation must always be considered when developing and implementing a project. Also, EBRD's Performance Requirement 8 (PR8) states that consultation with stakeholders and affected communities should be made in the context of cultural heritage issues.

In the event that national laws are insufficient or there are significant discrepancies between national and PR 10 provisions, then the following principles should be considered:

- > Promoting transparent communication between the project promoter, its workforce, the local communities directly affected by the project, and other interested stakeholders;
- > The involvement of the stakeholders has to be a process free of manipulation, interference, coercion and intimidation;
- > The involvement of the stakeholders has to be adapted on the basis of their status, level of influence and interest towards the project. For vulnerable groups, specific actions will be considered to eliminate possible barriers to their participation in the engagement process;
- > The involvement of stakeholders is a process which must take place in the early stages of the project, and continue throughout the entire life of the project; and
- > Ensuring access to an appropriate, fair complaints management mechanism for stakeholders to submit their questions, concerns or grievances about the project.

EBRD's Performance Requirement 1 (PR1), together with PR10, make it clear that engagement with the project stakeholders is an integral part of the process of assessing the potential environmental



and social impacts and issues associated with the project, and developing and implementing procedures for managing and monitoring these impacts and issues (i.e., in the present case, the ESIA process). PR1 requires the identification of the project's stakeholders and the design of a plan for engaging with the stakeholders in a meaningful manner to take their views and concerns into consideration in planning, implementing and operating the project. PR10 states that the process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the life of the project. In particular, Clause 22 notes that the client will engage in a scoping process with interested parties and identified stakeholders at an early stage of the ESIA process to ensure identification of key issues to be assessed as part of the ESIA. As part of the scoping process, stakeholders should be able to provide comments and recommendation on a draft SEP and other scoping documents.



3 STAKEHOLDER IDENTIFICATION AND MAPPING

Mapping (classifying) stakeholders is an on-going process throughout the life of the project, with some parties being identified in the initial phase of the implementation, while others are added as they gain influence or interest in the project. Stakeholders are individuals or organisations that:

- > Are directly or indirectly affected by a project (or company's operations);
- > Have "interests" in a project or a company or its area of influence that determine them as stakeholders; and/or
- > Have the potential to influence project outcomes or company operations.

In the current project context, several key stakeholders have already been identified, while others will be included in future project stages.

The stakeholders have been identified:

- During the preparation of the social baseline;
- Via direct meetings with the BSOG team;
- Based on the available documentation and research;
- Based on the observation notes made during the site visits; and
- Based on previous experience with similar oil and gas projects and on local knowledge.

The following list presents the key stakeholders who are engaged in project preparation / permitting phase:

- > **National Authorities** – Ministry of Environment (through the Environmental Protection Agency of Constanta and Danube Delta Biosphere Reserve Administration), Ministry of Culture and National Identity (through the Direction of Culture of Constanta County), Ministry of Waters and Forests (through the Romanian Waters National Authority), National Committee of the Coastal Area, Romanian Intelligence Service, Ministry of Defence (through the General High Staff), Ministry of Interior, National Agency for Mineral Resources, Hydrographic Marine Directorate, Forests' National Authority, Office of Cadastre and Real Estate Publicity, National Energy Regulatory Authority.
- > **Regional / Local Public Authorities (LPAs)** – Local Council and the Mayor's Office of Corbu, Environmental Protection Agency (EPA) of Constanta, Land Improvement Agency, Direction for Agriculture of Constanta, Direction of Public Health of Constanta, Prefecture of Constanta, Environmental Guard of Constanta, County Council of Constanta, State Inspectorate for Emergency Situations – Dobrogea.

Other central authorities involved in the upcoming permitting process will also be considered as stakeholders and added in the updated version of the SEP.

Beside the above, there are other categories of stakeholders who will be directly or indirectly engaged either at this stage or in future stages. These include the following key stakeholder groups for the overall project:

- > **Non-governmental organisation (NGOs)** – active both at national and/or regional/local level that are working in the fields of environmental protection, gender equality and social protection, forestry, nature conservation and agriculture.
- > **Fishery organisations** representing those who perform fishing activities in the project area.
- > **Tourists** who use the beach that will be crossed by BSOG pipeline for recreational purposes.
- > **Local businesses**, especially tourism-related businesses.



- > **Land owners/users** in the proximity of the project.
- > **Other businesses in the region** – especially other oil and gas companies that are present in the same general area as BSOG (either offshore or onshore)
- > **Mass-media** – represented by both national and local television, radio stations, newspapers and other online publications.
- > **Community Leaders and Opinion Makers** – high profile local leaders (mayor, priest, etc.)
- > **Public at large** – all interested persons that have an interest in the project.

There are also two categories of stakeholders that are considered to be internal to BSOG which shall be taken into account. The first category is represented by BSOG employees and contractors, while the second one is represented by BSOG shareholders/investors.

By plotting influence together with impact/interest on a matrix diagram and taking due account of further criteria such as expertise (i.e. knowledge to contribute and legitimacy) and the stakeholders' willingness to engage, the relative needs of key stakeholders in terms of the level and type of consultation and engagement are determined and can therefore be properly planned by BSOG throughout the project lifecycle.

Note that a stakeholder map that presents the relative importance of the stakeholder groups will be included in the next version of this SEP when more information will be available.



4 STAKEHOLDER ANALYSIS

Stakeholder analysis is achieved by assessing the position of each stakeholder in the context of the project preparation phase.

Each identified stakeholder has been analysed from two perspectives: its estimated interest in the project and its potential influence over the project. Table 4.1 presents the main outcomes of this analysis.

Stakeholder	Potential Interests	Potential Influence
National Authorities	> Project to be developed and implemented according to national and international standards.	> High influence due to their permitting responsibilities.
Regional/Local Authorities Public	> Project to be developed and implemented according to national standards. > Local authorities are interested in obtaining benefits for the local community.	> High influence due to their permitting responsibilities. > High influence over community perception.
Non-Governmental Organisations	> Interested in monitoring and oversight of how the project will comply with the environmental and social provisions and commitments.	> Medium influence via their lobby power or media coverage that might influence the company's image.
Fishermen organisations	> Interested in understanding the restrictions for fishing, if the case and how to overcome such restrictions.	> Medium influence via their lobby power.
Tourists	> Interested in using the beach and having no disturbance during their holiday. (It should be noted that within the area of the Delta Danube Biosphere Reserve, tourist activities and access for tourist purposes is strictly prohibited by Law; however, in practice people often disregard this restriction.)	> Medium influence via their potential to influence local decisions.
Local businesses (especially those focused on tourism) and other businesses in the area	> Interested in understanding the impacts of the project on their business activities.	> Medium influence via their lobby power at local level.
Land owners/users – neighbouring BSOG land	> Interested in having no disturbances on their property during construction and operational periods.	> Low influence but still significant due to media and NGO attention on such issues.
Mass media	> Interested in understanding the project and monitoring how all	> High influence due to their capacity for



Stakeholder	Potential Interests	Potential Influence
	provisions are complied with, especially the ones related to environment and social safeguards.	presenting information to a large audience.
Public at large / affected communities	> Interested in understanding the benefits and disadvantages of the project.	> Medium influence, with a potential to be able to become vocal and express their concerns about the project's risks.

Table 4-1 Results of Stakeholder Analysis



5 PREVIOUS ENGAGEMENT ACTIVITIES

Previous engagement activities have been related mainly to (1) the permitting processes that started in 2014 and are still ongoing and to (2) the land acquisition process that was finalised in 2016. Table 5.1 presents the current status of the permitting process for MGD.

Note that further details will be added and updates made as the project progresses.

Type of Permit	Offshore	Onshore	
		Pipeline	GTP
<i>Decision for the approval of the Urban Zoning Plan (PUZ) planning</i>	Not required	Obtained	
Environmental permitting procedure Environmental Consent (in Romanian: <i>Aviz de Mediu</i>)		Ongoing - several public consultation procedures conducted prior to the obtaining of the PUZ's approval	
<i>Construction permit</i>	Not available yet	Not available yet	Not available yet
Environmental Permit (in Romanian: <i>Acord de Mediu</i>)	Ongoing	Not available yet	Passed the screening procedure. Procedure suspended until Environmental Consent is obtained.

Table 5-1 Status of MGD Permitting Process

The following engagement activities have already been undertaken by the BSOG team:

- > **Development of the project website** – via this website, the company constantly provides information to all interested stakeholders about the project's development and makes public announcements about key stakeholders decisions, public consultation processes, and decisions related to permitting process;
- > **Official letters/correspondence with national/regional/local authorities** – BSOG has fully participated in the various permitting procedures for the components of the project. These procedures are ongoing and shall expand to cover elements of the entire project. On-going relevant engagement with a large number of authorities continues throughout this process;
- > **Direct meetings** – BSOG has organised and participated at a significant number of meetings with representatives of the various authorities in order to explain and present the project. Summary details of these meetings are presented in Table 5.2. Also, a series of meetings were organised with landowners in the area of Corbu and Vadu in order to acquire the necessary land for the on-shore activities. The land acquisition process was conducted by the BSOG team, without intermediaries. All necessary land for the onshore activities has now been acquired via **direct negotiations**. There are no registered complaints or court cases against BSOG on this matter;



- > **Public consultation sessions** – organised in the context of the environmental permitting procedures and urban zoning procedure conducted so far. The public consultation meetings were organised by the local environmental protection agency (EPA) from Constanta. Summary details of these sessions are presented in Table 5.3. Public announcements were made on the website of the local EPA and BSOG. Also, a public announcement was printed and posted at the municipality in Corbu and also published in a national newspaper. The public consultation session was held in November 2015. According to the official reports prepared after the public consultation sessions, there was no public participation at the public consultation session; thus, there were no comments / suggestions to the project documents. This activity will continue throughout the entire permitting process for MGD;
- > **Public announcements** – related to public consultations, posted on the notification board of municipality of Corbu, published in widespread newspapers and published on the company's website;
- > **Media coverage** – BSOG has also prepared press releases and media announcements, especially when a project milestone is achieved and whenever a public consultation session was organised;
- > **Internal official reports** - prepared either annually or twice a year for presenting the results of the performance monitoring and evaluation to internal stakeholders and in order to provide meaningful information to all the investors that are supporting BSOG.

To date, BSOG has not received any complaints related to the development of the project. This is a good indication that the engagement actions that have been performed were effective and that all parties were properly and timely informed and consulted. Experience from these activities has helped to inform the strategy for this SEP as defined in Section 6.

Date	Organisation consulted	Purpose of the meeting and information presented	Key outcomes/points raised

<HOLD – BSOG to provide details> Table 5-2 Summary of direct meetings held before preparation of this SEP

Date	Location	Purpose of the session and information presented	Key outcomes/points raised

<HOLD – BSOG to provide details> Table 5-3 Summary of public consultation sessions held before preparation of this SEP



6 STAKEHOLDER ENGAGEMENT PLAN

6.1 Action Plan

The following action plan has been designed for 2017 and is presented in Table 6.1. **This corresponds to the permitting phase of the project, including the development and disclosure of the Environmental and Social Impact Assessment (ESIA) Report** based on EBRD standards and other IFI requirements. This plan will be updated at least once per year or according to the project needs and the achieved results.

The disclosure of the ESIA report will be done in parallel with the disclosure process of the EIA reports prepared for the offshore and onshore project components. The EIA disclosure process is formally organised by the competent environmental protection agency (Danube Delta Biosphere Reserve Administration (DDBRA) and EPA Constanta), while the ESIA disclosure will be done by BSOG and EBRD.

BSOG will engage in a disclosure and consultation processes organised by the EPA Constanta as appropriate to ensure that outcomes for stakeholders are commensurate with the requirements of this SEP. If there are any significant gaps (e.g. in regard to any vulnerable people within the affected communities), BSOG shall implement suitable supplemental actions to address those gaps.

Figure 6.1 presents the parallel actions of disclosure of both the ESIA and the EIA:

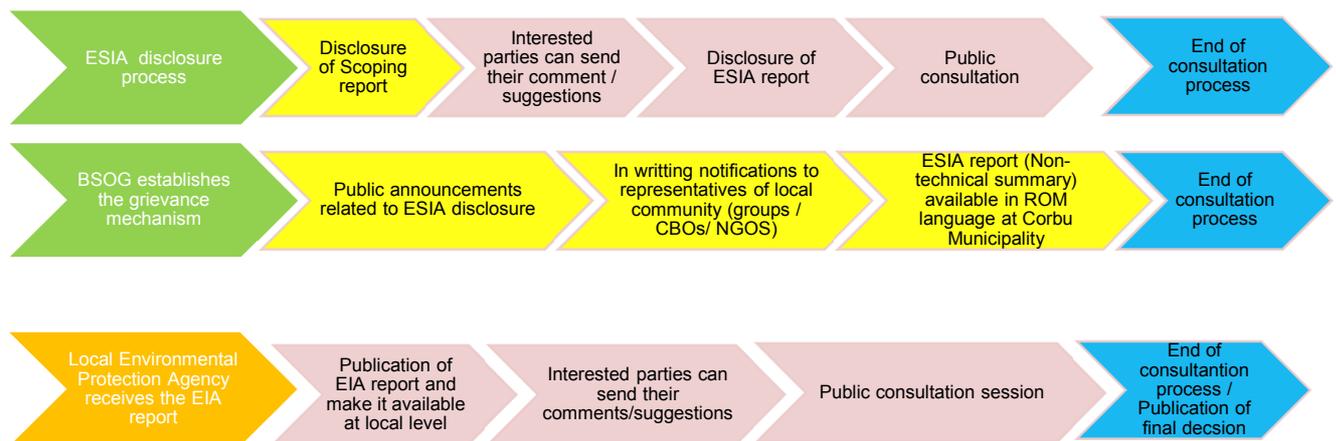


Figure 6-1 Overview of ESIA and EIA Disclosure Processes



Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location and period of disclosure	Responsibilities
All	Website	To provide access to information in a timely and efficient manner	Provide information related to: <ul style="list-style-type: none"> - project structure and components - company structure and policies - project's achievements - permitting procedures - timing for project development and implementation - contact details and grievance mechanism - ESIA documentation (scoping report, ESIA report) - environmental and social action plan (ESAP) 	BSOG office / ongoing	BSOG
	Public consultations	To provide information and consult interested parties	Provide information about the project's impacts and mitigation measures	Corbu municipality / during the disclosure procedure for the environmental permitting	BSOG / Local environmental authority
Local authorities of Constanta County	Meetings	To offer sufficient information about the project, to request feedback on the proposed ESIA process, to identify any concerns and to obtain the necessary permits	Provide information related to the project and the ESIA process, decisions related to project stages, etc.	Local authorities offices/when necessary	BSOG
	Official correspondence			When necessary	BSOG
National	Meetings	To offer sufficient information	Provide information related to the	National / Central authorities -	BSOG



Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location and period of disclosure	Responsibilities
Authorities		about the project, to request feedback on the proposed EIA process, to identify any concerns and to obtain the necessary permits	project, decisions related to project stages, etc.	when necessary	BSOG
	Official correspondence			When necessary	
Representatives (and potentially individual members) of the affected local communities / Professional groups (fishermen/local businesses)	Focus group meetings	Understanding the community concerns, needs and expectations, including those of specific groups such as vulnerable people and those whose livelihoods could be impacted	Presenting the project, its objectives, time life, impacts and benefits for local community Understanding the concerns, needs and expectations of specific groups and any vulnerable stakeholders	Corbu municipality/during ESIA disclosure process	BSOG
Mass media	Press releases	Offering timely information	Provide information about: <ul style="list-style-type: none"> - the project development - period of time of the public consultations sessions - results of the permitting procedure steps - decisions about permits 	Local/ Regional newspapers that are accessible to residents of affected communities / when necessary	BSOG

Table 6-1 Stakeholder Engagement Action Plan



6.2 Record keeping

The ESIA disclosure and consultation process may help to identify a range of issues that are directly associated with the project or with more strategic issues. Each individual issue raised needs to be considered and addressed by BSOG and, where appropriate, individual responses compiled and further meetings arranged. All environmental or social concerns raised by stakeholders specific to the Midia Gas Development project should be taken forward for consideration in the ESIA and decision-making processes.

To help manage this, all responses received as part of ESIA consultation will be documented in a register and appropriate actions identified and tracked. The register will be maintained and updated as appropriate throughout the project. Minutes will also be produced from all consultation meetings and documented within the consultation register.



7 GRIEVANCE MECHANISM

Stakeholders have the right to be informed about the project development and implementation and they also have the right to raise concerns and suggestions during the decision-making process. Effective and timely response to grievances is essential for maintaining good community relations, and this includes potential issues related to the project and its associated impacts.

Any request, objection, complaints or proposal filed by any stakeholder related with the project will be classed as a grievance.

The objectives of the BSOG grievance mechanism are to ensure that all grievances are promptly and effectively addressed, in a fair and transparent manner, throughout the Project lifetime. All complaints will be investigated to establish their validity and to ensure that all accepted grievances are dealt with in a correct and prompt manner; where relevant, corrective actions will be implemented to prevent any recurrence of problems.

A dedicated project grievance mechanism will be available at the level of BSOG and PIU (Project Implementation Unit). This will include but not be limited to: a template (record form) for logging complaints and suggestions; a direct phone line made available for anybody interested in communicating about the project; an appropriate access via emails and direct meetings with responsible project persons before, during and after construction works; and an online complaint form.

The following elements are included in the dedicated grievance mechanism for the current project:

- > A simplified grievance template that will be available at Corbu Municipality. The template will be available in the mayor's office and anybody interested in any aspect of the project can lodge it whenever necessary. BSOG will collect lodged grievances once per week. Appendix A includes an English language version of this template; the Romanian language template is the official version.
- > A direct phone number and email address from BSOG community engagement manager will be provided to all interested parties for enabling them to contact BSOG's representatives whenever necessary (please also see **Appendix B Contact List – Grievance Mechanism**).
- > Direct meetings with representatives of local communities where they can raise their complaints and/or suggestions, verbal complaints.
- > A complaint / suggestion box will be installed at the Corbu Mayor's offices. The box will be checked by the community engagement manager once per week and all the complaints will be registered and transmitted to PIU.
- > Online complaint form posted on BSOG's website that can be easily filled in by any interested party.

A complaint is considered to be valid if it is submitted using one of the above mentioned channels. All valid complaints received during the project ESIA disclosure and implementation process will be processed and registered by PIU in a dedicated grievance register. BSOG should keep these grievance registries in order to track all grievances and to be able to present these registries upon any request from EBRD or other relevant entity. The period of time for registry keeping and the methods for archiving documents should be established by internal procedures.

The register will include the following information:

- > Date lodged by complainant or date received by PIU;
- > Contact details of complainant;
- > Responsible person / department for investigating the complaint, checking its validity and addressing the issue and its causes;
- > Actions to be undertaken;
- > Due date;



- > Proposed resolution;
- > Feedback from the complainant;
- > Results; and
- > Closing date of the issue.

PIU will make all reasonable efforts to address the complaint upon acknowledgement of the grievance, progress chasing with the responsible person / department if actions are overdue and escalating any major problems to senior management. Stakeholders will be informed about the proposed corrective actions and follow-up of corrective action within 30 working days upon acknowledgement of the grievance.

If the complainant is not satisfied with the solutions proposed / implemented by the PIU to address the grievance, he/she may seek other legal remedies in accordance with the legal framework of Romania.

All stakeholders will be able to deliver complaints personally by post, e-mail, web site or facsimile. Any complaint may be delivered to the company at:

BSOG main office

București

Calea Floreasca nr. 175, etaj 10

Sector 1, 014459

București, România

Telefon: +40 21 231 32 56

Contact person: **Oana Ijdelea**

Web site: <http://www.blackseaog.com/en/home/>.

Email: oana.ijdelea@blackseaog.com

Figure 7.1 presents the steps that will be taken when a complaint is received by BSOG/PIU.

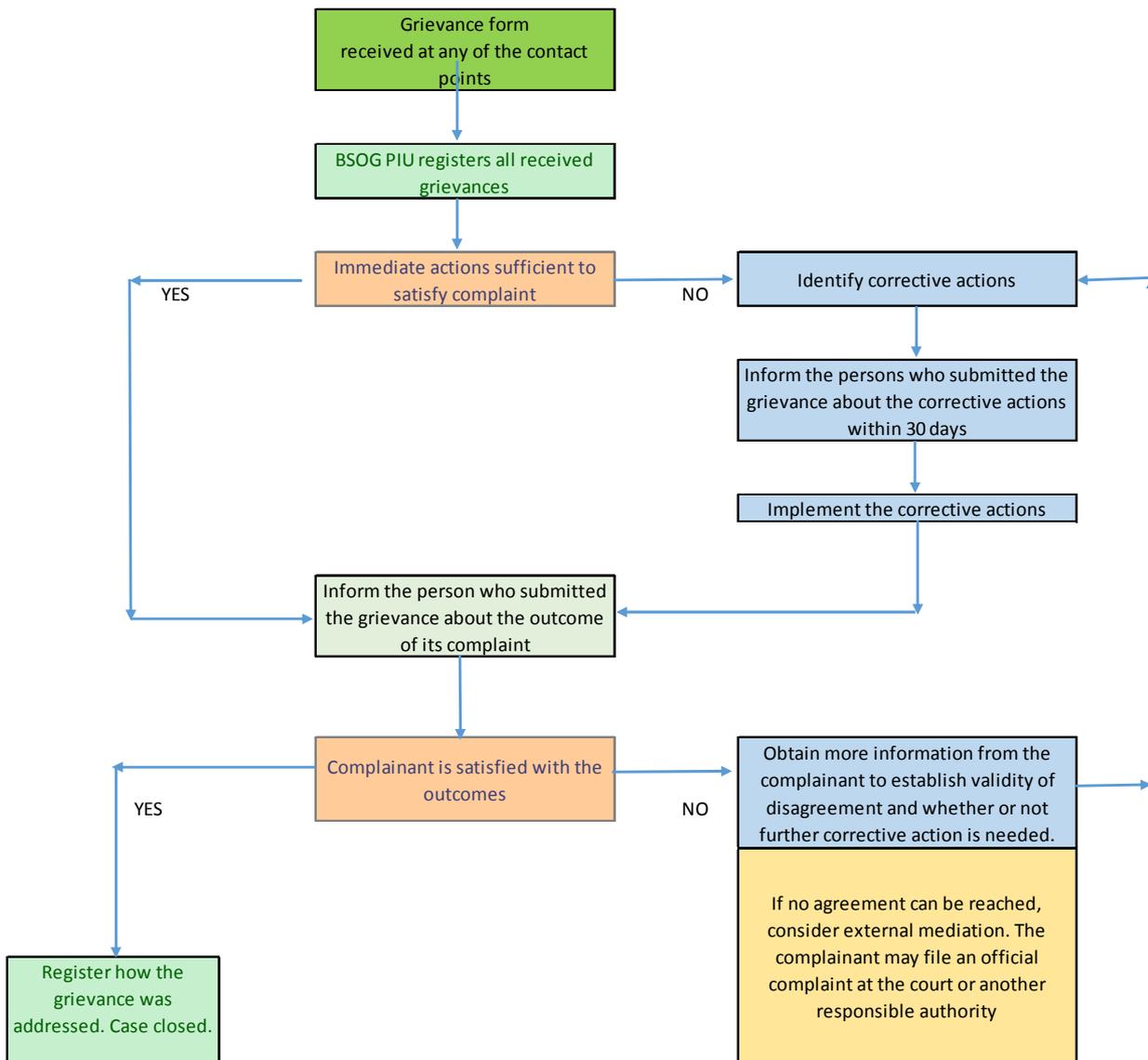


Figure 7-1 Overview of Grievance Mechanism



8 MONITORING AND EVALUATION

The objective of the monitoring and evaluation process is the continuous improvement of the environmental and social performance of the company.

Subsequent to signing the financing contract, BSOG will have to comply with the environmental and social provisions included in the financing agreements, to monitor the project's performance and to provide periodic environmental and social reports to the EBRD. BSOG will also have the responsibility to facilitate any monitoring visit or audit requested by EBRD.

Monitoring activities will be commensurate with the environmental and social impacts and issues associated with the project. They may also reflect any significant stakeholder concerns and include an environmental and social project completion review or audit, where relevant.

In the monitoring and evaluation process for stakeholder engagement, all the consultations undertaken, all the issues raised and the actions taken will be recorded. Also, this process implies the description of the lessons learned and any changes to the consultation process.

All queries in relation to the project will be filed in the comments registry, analysed and reported by BSOG project implementation team to management team on a two-month basis during project development and implementation.

The results and feedback from information disclosure and public consultation will be documented and reported as appropriate. Summary reports – in both English and Romanian - will contain details about suggestions or concerns raised by stakeholders and how their comments have been taken into account.

PIU will constantly monitor the engagement level of their stakeholders by developing a set of indicators which will include at least the following items:

- > Number of communications;
- > Type of communications;
- > Frequency of communications;
- > Number of valid complaints (and number rejected as unclear, problematic or dubious);
- > Type of complaints;
- > Sources of complaints;
- > Number of resolved complaints;
- > Average time for resolution of complaints;
- > Number of presentations on environmental, social and economic status of the company;
- > Number of mass media articles and / or announcements;
- > Number of stakeholders involved per action;
- > Level / degree of involvement for each stakeholder;
- > Number of visitors on the websites; and
- > Number of requests for information via websites.

A clear record of all these indicators will be kept at BSOG PIU office.

Another important aspect is the manner in which the public is informed about the SEP. PIU will make announcements about the SEP both on BSOG's website and in the local and national mass media. Also, the SEP will be part of the annual environment and safety report of BSOG.



Simplified Grievance Template

Comments & Suggestions Form

Project: Midia Gas Development Project, BSOG

Full Name, Surname

(If you want to remain anonymous, please do not fill this part. However, although we will address your communication, this will not allow us to reply to your suggestion/comment)

Reference No.	
Received on	
Received by	

Contact information (*please fill in how you want to be contacted*):

Post Address _____

Telephone _____

E-Mail _____

Contact:
Oana Ijdelea
Tel. 0721.936.235
Email
oana.ijdelea@blackseaog.com

Preferred contact Language: Romanian Other (pls. specify)

Please note here your suggestions and comments concerning the planned construction of the Project:

Please send this form back to BSOG per mail,



APPENDIX A CONTACT LIST – GRIEVANCE MECHANISM

<i>Organisation</i>	Contact person
BSOG	<p>Oana Ijdelea Tel. 0721.936.235 Email oana.ijdelea@blackseaog.com</p>
Corbu Municipality	<p>TBC</p>