

## ANNEX 11: STAKEHOLDER ENGAGEMENT PLAN

---

Pioneer in integrated consulting services



March 2016



## PRINOS OFFSHORE DEVELOPMENT PROJECT

Stakeholder Engagement Plan

*THIS PAGE IS LEFT INTENTIONALLY BLANK*

PRINOS OFFSHORE DEVELOPMENT PROJECT STAKEHOLDER ENGAGEMENT PLAN	
Environmental Consultant:	
	LDK Engineering Consultants SA
Date:	04/03/2016
Revision:	04
Description:	4 <sup>th</sup> Draft interim submittal

	Name – Company	Responsibility	Signature	Date
Prepared by:	Thomas Kollias, LDK	Senior ESIA / O&G / social / stakeholder engagement consultant		
	Dimitra Evaggelakopoulou, LDK	Junior ESIA/ O&G/ social / stakeholder engagement consultant		
Checked by:	Costis Nicolopoulos, LDK	Head of LDK Environment, principal, project director		
Approved by:	Vassilis Tsetoglou – ENERGEAN	HSE Director		
	Dr. Steve Moore – Energean	General Technical Director		

*THIS PAGE IS LEFT INTENTIONALLY BLANK*

## TABLE OF CONTENTS

<b><u>1</u></b>	<b><u>INTRODUCTION</u></b>	<b><u>1</u></b>
1.1	CONTEXT AND PURPOSE OF THIS DOCUMENT	1
1.2	STRUCTURE OF THE PRESENT SEP	2
<b><u>2</u></b>	<b><u>BRIEF DESCRIPTION OF THE PROJECT</u></b>	<b><u>3</u></b>
2.1	SHORT PROJECT DESCRIPTION	3
2.2	SOCIAL CONTEXT	1
<b><u>3</u></b>	<b><u>REQUIRMENTS FOR STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</u></b>	<b><u>1</u></b>
3.1	INTRODUCTION	1
3.2	NATIONAL AND EUROPEAN LEGISLATION	1
3.2.1	LAWS AND REGULATIONS	1
3.2.2	ENGAGEMENT AND DISCLOSURE REQUIREMENTS	3
3.3	EBRD REQUIREMENTS	4
<b><u>4</u></b>	<b><u>STAKEHOLDER IDENTIFICATION AND ANALYSIS</u></b>	<b><u>6</u></b>
4.1	STAKEHOLDER IDENTIFICATION AND PRIORITIZATION	6
<b><u>5</u></b>	<b><u>STAKEHOLDER ENGAGEMENT AT DIFFERENT PROJECT STAGES</u></b>	<b><u>1</u></b>
<b><u>6</u></b>	<b><u>PAST STAKEHOLDER ENGAGEMENT</u></b>	<b><u>2</u></b>
6.1	ESIA SCOPING	2
6.1.1	INTRODUCTION	2
6.1.2	STAKEHOLDER ENGAGEMENT ACTIVITIES	2
6.1.3	ISSUES RAISED BY STAKEHOLDERS AND RESPONSES	5
<b><u>7</u></b>	<b><u>FUTURE STAKEHOLDER ENGAGEMENT</u></b>	<b><u>9</u></b>
7.1	ESIA STAGE	9
7.1.1	ESIA DISCLOSURE	9

---

<b>7.2</b>	<b>POST-ESIA</b>	<b>1</b>
7.2.1	CONSTRUCTION PHASE	1
7.2.2	OPERATION PHASE	2
<b>7.3</b>	<b>ACTION PLAN</b>	<b>2</b>
<b><u>8</u></b>	<b><u>GRIEVANCE MECHANISM</u></b>	<b><u>1</u></b>
<b><u>9</u></b>	<b><u>MONITORING AND REPORTING</u></b>	<b><u>3</u></b>
<b><u>10</u></b>	<b><u>ROLES AND RESPONSIBILITIES</u></b>	<b><u>4</u></b>
<b><u>11</u></b>	<b><u>APPENDICES</u></b>	<b><u>1</u></b>
	<b>APPENDIX 1 – MINUTES OF MEETING FROM SCOPING</b>	<b>1</b>
	<b>APPENDIX 2 – PRESENTATION USED IN SCOPING</b>	<b>2</b>
	<b>APPENIDX 3 – GRIEVANCE MANAGEMENT PROCEDURE</b>	<b>3</b>
	<b>APPENIDX 4 – INCORPORATION IN ESIA OF THE RESPONSES TO STAKEHOLDERS ISSUES</b>	<b>4</b>

# 1 INTRODUCTION

---

## 1.1 CONTEXT AND PURPOSE OF THIS DOCUMENT

---

This document presents the Stakeholder Engagement Plan (SEP) for the Prinos Offshore Development Project, located offshore in the Gulf of Kavala, 8 km west of the island of Thasos and 18 km south from the main coastline of Kavala.

The Licence Operator is Energean Oil & Gas S.A., engaged in the exploration, production and exploitation of hydrocarbons as per the concession agreement ratified by the Greek parliament (Law 2779/1999, Law 4135/2013 and Law 4296/2014) covering the offshore areas of Prinos and South Kavala.

Energean is a private company specialized in exploration, production and exploitation of hydrocarbons, operating for many years in the offshore areas of Gulf of Kavala. Currently, the company operates three offshore oil and gas fields in the Prinos basin (Prinos, Prinos North and South Kavala) in the Gulf of Kavala via various wells from small drilling platforms.

The investment plan of Energean is the installation of two new unmanned offshore platforms in the offshore area of Gulf of Kavala, a series of wells as well as submarine pipelines connecting the new platforms to the existing platforms.

This SEP provides a framework to guide the establishment of a broader and continuous engagement process between the company and those who potentially would be impacted, or have any kind of interest in the Project (stakeholders). This process encompasses a range of activities and approaches and spans the entire life of the project (design, preconstruction, construction, operation, decommissioning).

The overall goal of this SEP is to realise a process of planned stakeholder dialogue, incorporating the sharing of information and knowledge to build strong longterm local relationships based on mutual understanding and trust. The key objectives of the SEP are as follows:

- Provide a preliminary identification and mapping of key stakeholders of the project, including vulnerable groups (if any), to be updated as the Project evolves.
- Provide a practical framework for the dialogue with stakeholders through the life of the aforementioned Project that is technically and culturally adapted to the local context.
- Ensure that the SEP is underpinned with sufficient resources, supportive institutional structure and adequate processes.



The SEP is a key supporting document to the Project Environmental and Social Impact Assessment (ESIA) that is developed by LDK Consultants with the assistance of ERM Ltd for Energean S.A. and is planned for submission to the Greek competent authorities (Ministry of Environment and Energy) in March 2016.

The dialogue approach detailed in this SEP has been prepared in line with national legislation and country norms as well as EBRD standards. The SEP is a “living” document that will be updated as the project evolves and the stakeholder landscape is further understood.

## 1.2 STRUCTURE OF THE PRESENT SEP

---

This document comprises the following sections:

- Introduction
- Description of the Project and of the Social Context
- Regulative framework
- Stakeholder identification and prioritization
- Presentation of past stakeholder engagement activities
- Development of future stakeholder engagement activities
- Grievance Mechanism
- Monitoring and reporting
- Roles and responsibilities

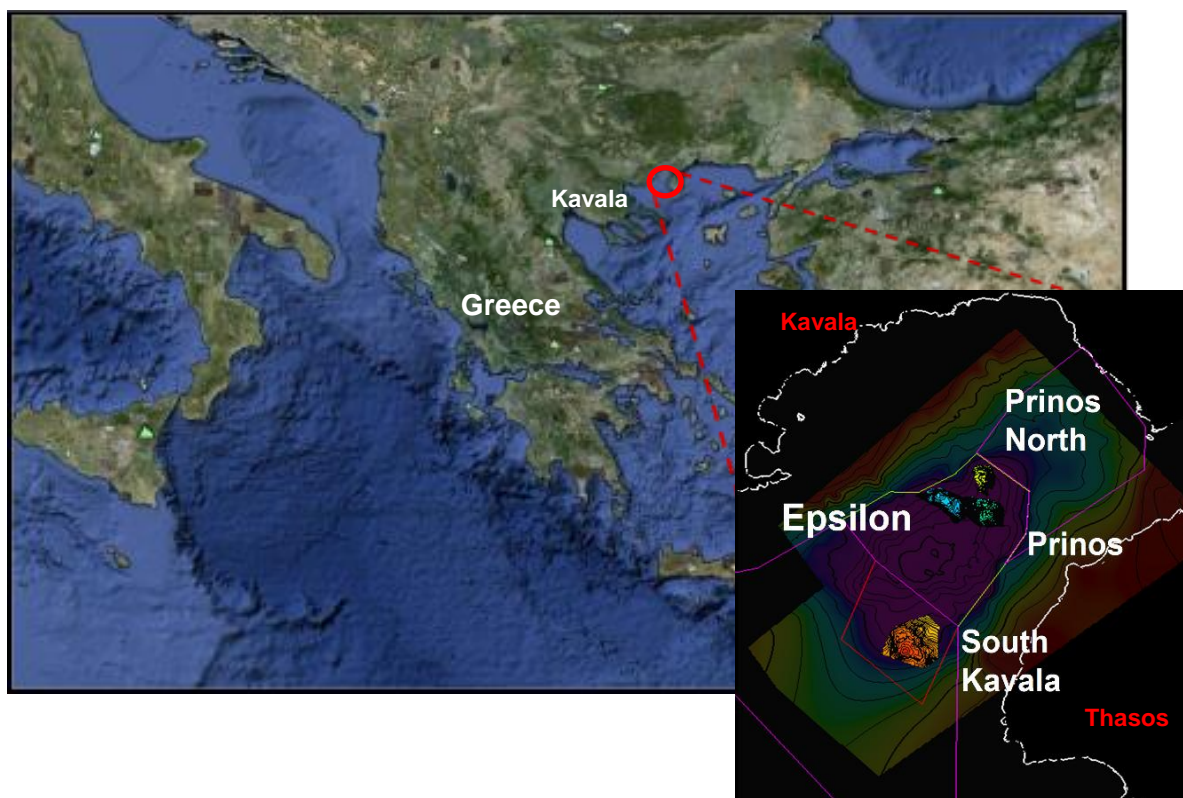
The document contains the following Annexes:

- Appendix 1 – Minutes of Scoping Meeting
- Appendix 2 – Presentation used in Scoping Meeting
- Appendix 3 – Grievance Management Procedure
- Appendix 4 - Incorporation in the ESIA of the responses to stakeholders issues

## 2 BRIEF DESCRIPTION OF THE PROJECT

### 2.1 SHORT PROJECT DESCRIPTION

As mentioned earlier, the overall development area is located offshore in the Gulf of Kavala, 8 km west of the island of Thasos and 18 km south from the main coastline of Kavala. The Gulf of Kavala is part of the Thracian Sea and falls within the North East Aegean as presented in the below maps. The Project area extends over an approximate area of 4 km<sup>2</sup>.



Map 1: Location of the Project in the Gulf of Kavala and hydrocarbon deposits in the Gulf of Kavala.

To date eight separate hydrocarbon deposits have been discovered in the Gulf of Kavala. Three of these (South Kavala, Prinos and Prinos North) are in production. Epsilon has been appraised and is ready to be developed.

Partially processed oil and gas is transported through submarine pipelines to the onshore plant, called Sigma plant. The Sigma plant includes units for converting produced sour gas to sweet gas producing sulfur by a chemical reaction of hydrogen sulfide, for the dehydration, desalination, stabilization and storage of the produced crude oil in order to be safely loaded on

tankers.

The Project comprises the development of a drilling resource, infill drilling in the Prinos field, obtaining sub-surface data to identify subsequent development areas, develop the Epsilon satellite field and confirm plans to install a second platform at Prinos North (future phase). Further activities will depend on the interpretation of newly acquired 3D seismic data and studies to investigate the Enhanced Oil Recovery (EOR) potential of Prinos.

Due to the fact that the overall project consists of already existing facilities in operation since 1981, planned extension as well as potential further developments (as capsulated in the ESIA), the present SEP respectively covers:

- The overall offshore facilities that have been developed and in operation since 1981;
- The planned extensions to be included in the EBRD loan package; and
- The potential future extensions that Energean is currently studying.

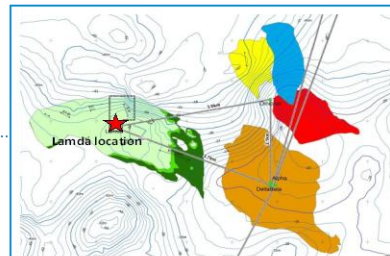
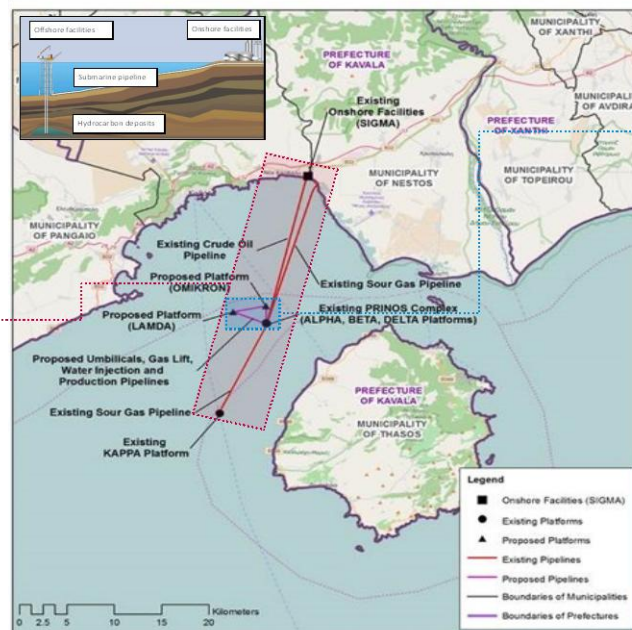
As mentioned earlier those facilities will be covered in the SEP actions throughout their life cycle, i.e. construction, operation and abandonment phases.

The infogram presented below provides an overview of the existing facilities, the planned project and the further potential developments in the offshore licensed areas of the Gulf of Kavala as well as the company's investment plan's time schedule.

**Project Description**

**EXISTING FACILITIES**

- The Kappa platform located on the sweet, non-associated gas field South Kavala;
- The 12" pipeline that transports sweet gas and condensate from South Kavala to Prinos Delta;
- The 12-slot production jackets Prinos Alpha and Prinos Beta which form part of the bridge linked Prinos complex;
- The Prinos Delta platform that contains all offshore processing facilities and which receives oil, gas, water and condensate produced from Prinos, Prinos North and South Kavala fields;
- The Prinos flare jacket;
- A 12" dry-gas pipeline connecting Prinos Delta to the onshore facilities;
- An 8" oil pipeline connecting Prinos Delta to the onshore facilities;
- A 5.3" pipeline that transfers sweet dry gas from the onshore facilities to Prinos Delta;
- Two 10kV submarine power cables that transport electricity from the onshore facility to Prinos Delta.



**PLANNED EXTENSION PROJECT**

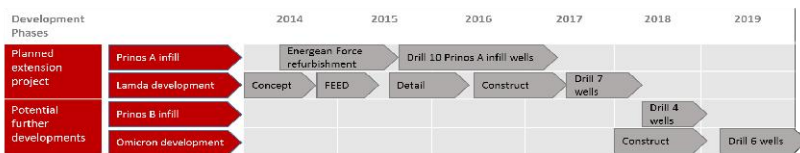
- The re-entry of nine (9) existing wells on the Prinos Alpha platform and the sidetracking of these to new bottom-hole locations in the Prinos field.
- The re-entry of one (1) existing Prinos North extended reach well located on the Prinos Alpha platform.
- The design, fabrication, installation, commissioning and subsequent operation of a new well-head jacket platform (called "Lamda") approximately 3.5 km's north west of the existing Prinos platforms. All produced fluids are transported to the Prinos Delta platform where existing equipment is used to separate oil, water and gas.
- Three (3) sub-marine pipelines that connect Lamda to Prinos Delta. These comprise one 10" pipeline to carry multi-phase well fluids from Lamda to Delta, and two 6" pipelines to carry injection water and lift gas respectively from Prinos Delta to Epsilon.
- Between 5 and 9 new wells to be drilled from the Lamda platform into the Epsilon field. These wells will initially be completed as producers with between 2 to 4 being converted after approximately 18 months to water injectors. The range of well numbers planned reflects the uncertainty in recoverable reserves. The designed platform is equipped with 15 slots.



**POTENTIAL FUTURE DEVELOPMENTS**

This would introduce a second new wellhead jacket ("Omicron"), which would be located between the Prinos North and Prinos platforms and used to further develop Prinos North in addition to the Kazaviti discovery. Kazaviti will be appraised by the 3rd planned Prinos Alpha sidetrack (well PA-36), allowing a decision to be made on the viability of this potential project subsequently.

**PRINOS AREA OVERALL DEVELOPMENT SCHEDULE**

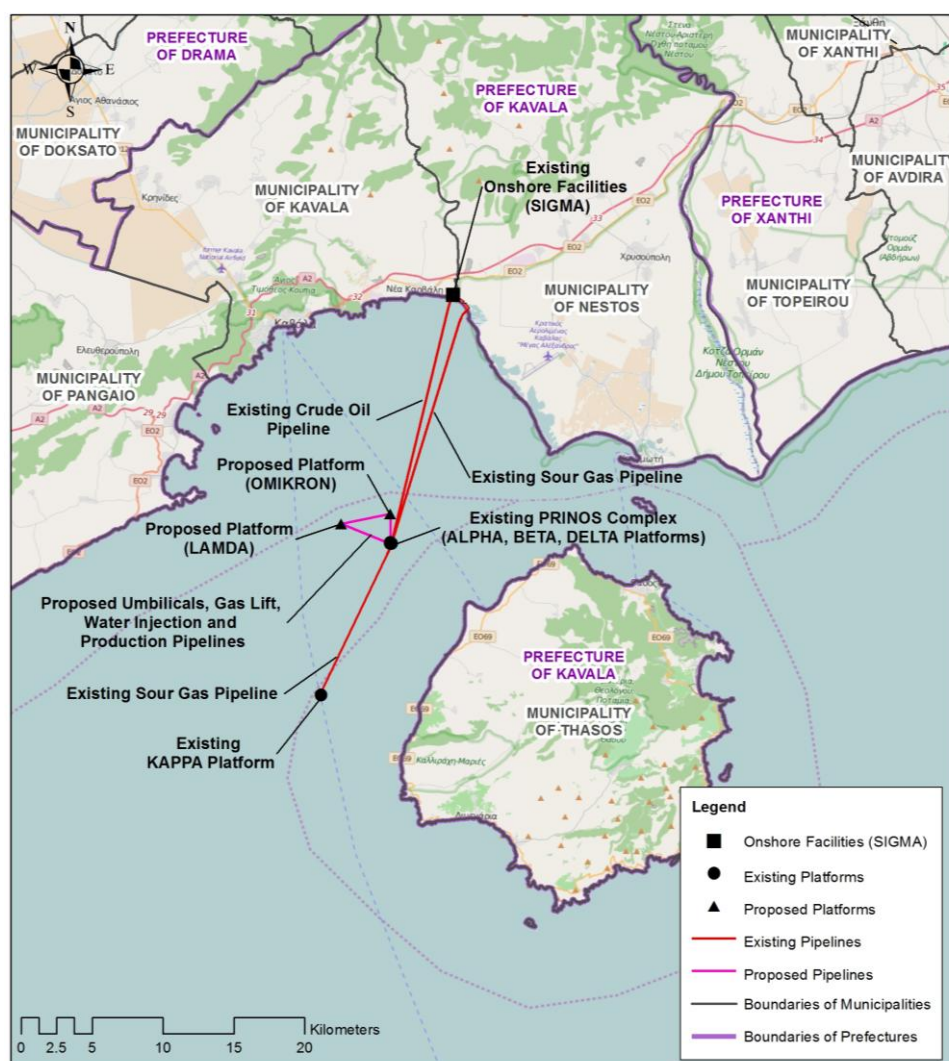




## 2.2 SOCIAL CONTEXT

The proposed and existing facilities are located in the East Macedonia and Thrace region, in the southern coastal part of the Regional Unit of Kavala, near the limits of Municipalities of Kavala (on the North), Pangaio (on the North-NorthWest), Nestos (on the North-NorthEast) and Thasos (on the East-SouthEast), following the L.3852/2010 (A' 87) "Kallikratis" Programme.

Associated onshore facilities (Sigma plant) fall within the Municipality of Kavala bordering with Municipality of Nestos (see Map 3 below).



Map 2: Administrative units of the project's surroundings

All the municipalities of the Regional Unit (RU) of Kavala have a coastline and the main settlements are next or near the sea. The majority of Kavala Regional Unit's population lives in coastal areas (including Thasos Island).

The permanent population of the RU of Kavala, according to the results of the 2011 census, amounts to 608,182 residents, representing 5.62% of the total population of the country. Out of all residents, 49.3% (299,643 residents) are male and 50.7% (308,539 residents) are female. 59.1% of the total population is classified as urban population, with an increasing trend of urbanisation, whereas 40.9% of the population is classified as rural population.

There are no ethnic or linguistic minorities in the wider Project area, nor are there any significant parts of population that lack housing or are vulnerable due to other economic or social factors. Thus, no particular vulnerable groups were identified for the purpose of this Project.

Agriculture, animal farming, fishing, aquaculture (in sea and fresh water) and beekeeping are developing throughout the area and contribute significantly to its financial figures. The secondary sector includes businesses processing the primary sector, such as the natural and mineral wealth (oil and marble extraction), and businesses processing other raw materials. The tertiary sector is important for the RU of Kavala, especially the tourism industry, which occurs mainly during the summer and is focused on the island of Thasos and the coastal zone of the RU of Kavala.

The infogram presented below provides an overview of the main socioeconomic and environmental sensitivities present in the study area. Fishing activities, plus aquaculture and fisheries process units, provide income to many residents of Kavala and Thasos Island. Tourism (hotels and restaurants) in Kavala and Thasos Island, as part of tertiary sector, contributes significantly to local GDP and employment.

## Socioeconomic Baseline

The current socioeconomic conditions in the Project area set the benchmark against which impacts are considered. The data presented in this figure was collected mainly from secondary sources (literature, past studies etc) which have been supported by a number of field studies. The primary study area for the socioeconomic baseline comprises the Msettlements along the coast of the Kavala Gulf as well as the Kavala Gulf.

### LANDSCAPE AND VISUAL CHARACTER

The area between the rivermouth of Strymonas and Nea Peramos (western shores of Kavala), over the last decade have seen a significant increase of construction activities with regard to holiday houses. The next coastal area between Nea Peramos and Kavala, has long been a tourist attraction, demonstrated by the development of a tourism activities zone, with hotels, holiday and permanent residences, as well as restaurants. The shores of the area between Kavala and Nea Karvali consist of a series of bays with sand beaches, which are formed from low hills, with steep slopes towards the sea.

There are no signs of archaeological findings within the marine area of the Gulf of Kavala. Whereas the shallow waters do not lend themselves to the preservation of any significant archaeological resources.

### SOCIO-ECONOMIC ENVIRONMENT

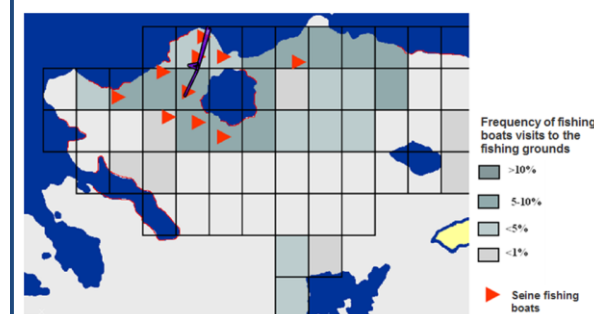
Kavala city is the most developed urban centre of Eastern Macedonia and Thrace, is located exactly on tip of the road axis between Thessaloniki and the Turkish border. It contained the second largest commercial port of Egnatia Odos, to the east of the city of Kavala. With one large port and one equally large marina downtown, in combination with the Nea Peramos port and the Nea Irakleitsa marina, Kavala, among others, is one of the most significant fisheries centres in Greece

As a commercial and industrial centre, it is ranked second in N. Greece, behind Thessaloniki. In addition to tobacco processing industries and tobacco warehouses, food and salted foodstuff factories, as well as roller mills and rice mills operate in the city, while the tobacco of Macedonia and Thrace is exported from its port.

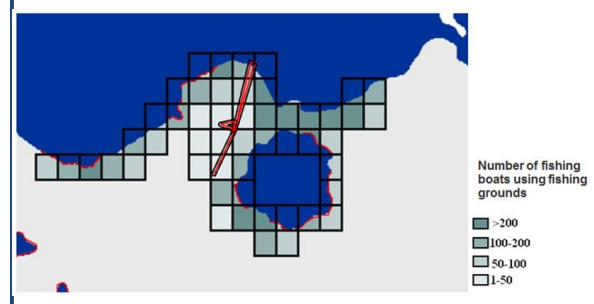
### FISHERIES

The entirety of the Kavala Gulf is considered a fishing ground. Targeted species include molluscs (mussels, oysters), crustaceans (shrimps, prawns, crabs) and pelagic fishes (sardine, European anchovy, bluefish, bonito, tuna). A recent survey observed approximately 250 vessels small coastal vessels (3-15 m) and 38 medium sized vessels (15-30 m). An estimated 2,000 to 2,500 people are directly or indirectly employed in the fisheries sector. The principal market is the Kavala Fish Market where approximately 8,000 to 10,000 tonnes of fish are traded annually.

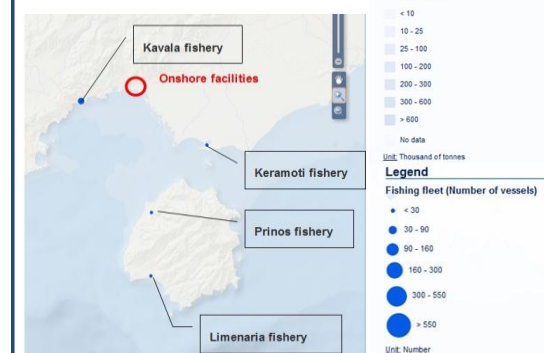
Trawler fishing grounds—red arrows indicate main fish-



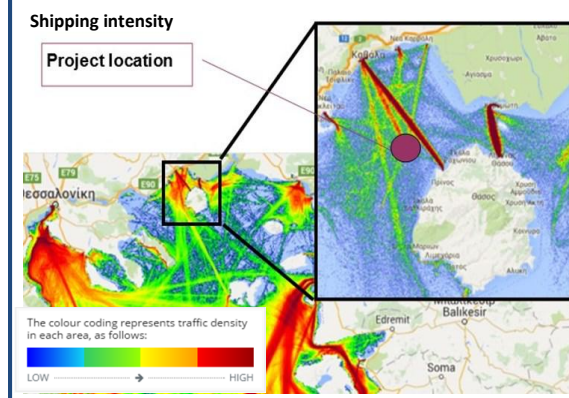
Coastal fishing grounds



### AQUACULTURE



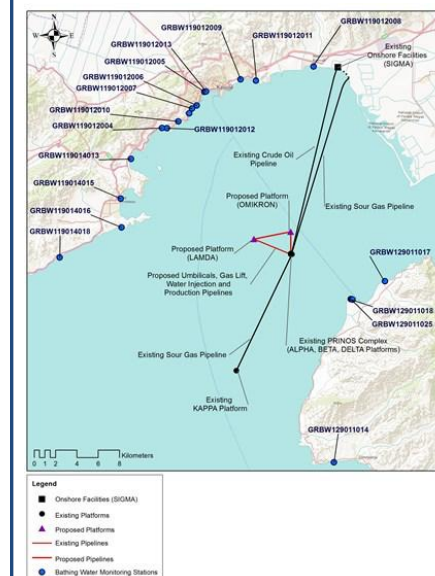
### NAVIGATION



### TOURISM

In accordance with data from Hellenic Statistical Authority (ELSTAT, 2011), the RU of Kavala – which includes the island of Thasos, shows greater specialization in tourism, absorbing 54% of all tourists staying in the region. The island Thasos is the main tourist attraction, located in the Kavala Gulf, at the northern part of Aegean Sea. Thasos is one of the most typical cases of coastal areas with mass tourism – and for many decades it is the most known tourist attraction, resulting in large concentrations thereof, either in the form of visitors or the form of holiday-makers.

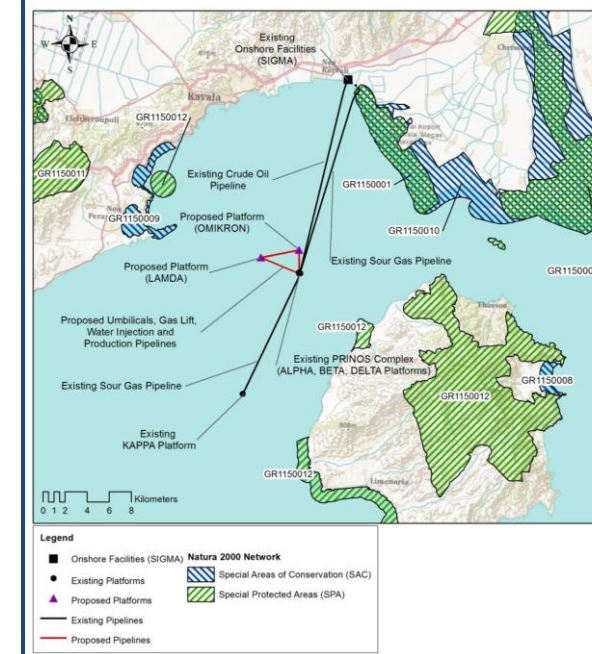
Main beaches in the Study Area



### PORT INFRASTRUCTURE



### PROTECTED AND SENSITIVE AREAS





## 3 REQUIRMENTS FOR STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

---

### 3.1 INTRODUCTION

---

Stakeholder Engagement for the Project will be performed according to the following requirements:

- Legislative requirements of Greece;
- European Union legislation;
- EBRD Requirements.

As mentioned previously, the Stakeholder Engagement process is a basic element of the ESIA that follows the project throughout its life cycle (construction – operation – abandonment).

### 3.2 NATIONAL AND EUROPEAN LEGISLATION

---

#### 3.2.1 Laws and Regulations

The key International Requirement is the “*Aarhus Convention*, on access to information, public participation in decision-making and access to justice in environmental matters” (as referred at ar.6 of the the UN Economic Commission for Europe). The Aarhus Convention lays down a set of basic rules to promote citizens’ involvement in environmental matters and improve enforcement of environmental law. Its main three pillars are:

- Access to information: any citizen should have the right to get a wide and easy access to environmental information. Public authorities are obliged to provide all the information required and collect and disseminate them and in a timely and transparent manner;
- Public participation in decision-making: the public has a right to participate in decision-making in environmental matters. Arrangements should be made by public authorities to enable the public to be informed and subsequently to comment (if wishing to do so) on proposals for projects affecting the environment, or plans and programmes relating



to the environment. Any subsequent comments are to be taken into consideration in the decision-making process;

- Access to justice: the public has the right to judicial or administrative recourse procedures in case a Party violates or fails to adhere to and the convention's principles.

Greece has transposed the European Legislation for environmental impact assessment (with the exception of the new EIA Directive – 2014/52/EU) and disclosure & engagement requirements. The main European Legislation is:

- 2003/35/EC Directive, on public participation in respect of the drawing up of certain plans and programmes relating to the environment and amending with regard to public participation and access to justice Council Directives 85/337/EEC and 96/61/EC.
- 2013/30/EC Directive, on safety of offshore oil and gas operations and amending Directive 2004/35/EC (note: the Directive defines the importance to ensure that the public is given early and effective opportunity to participate in the decision making).
- EIA Directive (2014/52/EU)<sup>1</sup>, which amends 2011/92/EU Directive: certain provisions (article 6) are provided for the consultation of Authorities and to ensure the effective participation of the public concerned in the decision-making procedures, electronically and by public notices. The Member States shall determine the means of disclosure. In any case, the timeframes for consulting the public concerned shall not be shorter than 30 days.

The National Legislation on stakeholder engagement activities is:

- Joint Ministerial Decision (JMD) 1649/45/2014, on consultation means and ways of informing the public during the environmental permitting procedure
- L. 4014/11, on procedures for environmental permitting.
- Ministerial Decision (MD) 167563/2013, on specifications for the environmental permitting process (note: the MD refers, among others, to the means of incorporating the opinion of the public)
- JMD 9269/2007, on judicial process to protect the public against the administrative acts or omissions regarding the disclosure of information and participation during the ESIA stage
- L. 3422/05, on ratification of Aarhus Convention (Directive 2013/35/EC)
- JMD 3711/2003, on means informing citizens on the procedure of approval of environmental terms.

---

<sup>1</sup> Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by 16 May 2017.

### 3.2.2 Engagement and Disclosure Requirements

JMD 1649/45/2014 and L.4014/2011 specify provisions for:

- The consultation means of the different authorities and
- The ways of informing the public as well as its participation in the public consultation during the environmental permitting procedure.

The aforementioned JMD prescribes that the consultation (in line with article 18, paragraph 5 of L.4014/2011), should take place through web-based application, the so-called Digital Environmental Registry. However, there is a transition period foreseen until the registry becomes operational and for this interim time different consultation procedures have been prescribed. Moreover, the authorities that need be consulted are identified in Annex B of the JMD for each type of project and activity.

According to the aforementioned national legislation, the stage of environmental scoping is voluntary, since the analytical specifications for the ESIA table of contents are already specified for all project classes (A1, A2 and B), types and activities, in MD 170225/2014.

Moreover, during the ESIA phase, the Competent Authority (Ministry of Environment and energy – YPEN), following the competence check, will apply the following consultation process:

- The draft ESIA will be sent to following Authorities for their opinion:
  - ⇒ Ministry of Defence
  - ⇒ Ministry of Environment & Energy / Dpt of Spatial Planning
  - ⇒ Ministry of Environment & Energy / Dpt of Forest Management
  - ⇒ Ministry of Environment & Energy / Dpt of Waters
  - ⇒ Ministry of Environment & Energy / Dpt of Biodiversity Protection & Waste Management<sup>2</sup>
  - ⇒ Ministry of Environment & Energy / Dpt of Hydrocarbons
  - ⇒ Ministry of Environment & Energy / Dpt of Spatial Planning & Environmental Protection
  - ⇒ Ministry of Culture
- In parallel to the above, the ESIA will be sent to the Regional Council of East Macedonia – Thrace, which is responsible for disclosing it to the public and for the notification to the media of the availability of the ESIA for comments from the public. More specifically, the ESIA will be disclosed as part of the abovementioned national regulatory approval process and it will be available to the local community, through the Regional Council (locations where the ESIA will be available are determined by the Regional Council) and the public can send comments directly to the Regional Council.

---

<sup>2</sup> The opinion of Management Body of Nestos-Vistonida National Park will be asked by the Dpt.

The disclosure of the ESIA, through the Regional Council, is commencing following media release in local and national press (this is the Company's responsibility). Also, the date for the public information session of the Regional Council for the ESIA is notified to the public through media release in local and national press (this is also Company's responsibility). The Regional Council, according to MD 1649/45/12, is obliged to provide to the public any available environmental information<sup>3</sup>.

- The Regional Council is also asking the opinion of the Municipal Councils and Community Councils. The sessions of these Councils are open to the public.
- In the Regional Council session, for the ESIA, the assigned employee of the Dpt of Environment of the Region presents his/her appraisal of the ESIA including a presentation of the Project, the key baseline elements, and impacts and mitigation measures. Finally, the assigned employee concludes whether the ESIA is acceptable or not. A discussion of the ESIA and the technical report takes place.

The Regional Council, following a public session, which is open to public and any interested party / stakeholder, will send its opinion, by incorporating the public's comments or other stakeholders' comments (minutes of meeting from the aforementioned public hearing), to the Ministry. Stakeholders and the public are present in the Session and they can express their opinion. The Project Owner is invited by the Regional Council and, if asked by the Council, can answer to questions raised by any party.

- The ESIA approval (Decision of Approval of Environmental Terms), usually, incorporates stakeholder's comments.

The whole procedure has a duration of 45 days, according to the law, although in practice it generally lasts more than 60 days.

The National legislation does not require any stakeholder engagement requirements before the ESIA submission to Authorities and subsequent public disclosure.

### 3.3 EBRD REQUIREMENTS

---

Energean Oil & Gas is applying the Performance Requirements (PRs) of the EBRD. The relevant PR for stakeholder engagement is PR10 (Information and Disclosure and Stakeholder Engagement).

According to PR10 "EBRD considers stakeholder engagement as an essential part of good business practices and corporate citizenship, and a way of improving the quality of projects. In

---

<sup>3</sup> "Environmental information": any information or data related to environmental permitting, as defined in ar.3 of MD 1649/45/14.

particular, effective community engagement is central to the successful management of risks and impacts on communities affected by projects, as well as central to achieving enhanced community benefits. In particular, effective community engagement is central to the successful management of risks and impacts on communities affected by projects, as well as central to achieving enhanced community benefits”.

EBRD supports the approach of the UNECE Aarhus Convention, which identifies the environment as a public good and sets the basic objectives of the stakeholder engagement, which are:

- Identifying potentially affected parties by the project, as well as other interested parties.
- Ensuring that such stakeholders are appropriately engaged, through a process of information disclosure and meaningful consultation.
- Maintaining constructive relationships with stakeholders on an ongoing basis.

EBRD Standards (PR10) require the following:

- PR 10 requires the stakeholder consultation to take place at the early phases of ESIA development and in particular during scoping.
- PR 10 requires disclosure of the ESIA to ensure meaningful consultation and disclosure of project information and to allow stakeholders to provide inputs and raise concerns. Consultation and information disclosure should not cease at ESIA disclosure but continue for the life of the Project. Similarly stakeholders should be able to engage with the Project during the life of the project.
- PR10 also requires analytical stakeholder mapping through the stakeholder engagement plan (SEP), which should include a number of interested and affected parties, including the public and vulnerable groups, and not just authorities.
- PR 10 requires the Project owner to take a lead role in ensuring adequate stakeholder engagement and information disclosure takes place.
- The EBRD's public information policy requires the ESIA to be disclosed for a minimum of 60 days before the project can be presented to the EBRD's Board of Directors for an investment decision.
- The ESIA should remain in the public domain for the life of the Project (e.g. online).

## 4 STAKEHOLDER IDENTIFICATION AND ANALYSIS

---

### 4.1 STAKEHOLDER IDENTIFICATION AND PRIORITIZATION

---

“Stakeholders” are defined as:

- Parties which are or can be influenced by the Project (positively and/or negatively).
- Parties showing their interest in the Project.
- Parties which are able to influence the Project.

The list of stakeholders and the plan of engagement with various groups will be issued and revised on regular basis. This will ensure that the Company is aware of those who are interested and/or concerned with the Project and, consequently, should be involved in the engagement process.

While preparing this Plan, the main groups of stakeholders were identified.

The key groups of identified stakeholders are presented in **Σφάλμα! Το αρχείο προέλευσης της αναφοράς δεν βρέθηκε.** Table 3 below. In course of the Project implementation, this list may be clarified and amended.

Identification and analysis of stakeholders groups is decisive for the purposes of the Plan and for choosing of engagement mechanisms. To prioritize stakeholders, the matrix of stakeholders influence is used. The stakeholders influence matrix allows a better understanding:

- Whom and how the Project influences.
- How various stakeholders can influence the Project and with what risks or opportunities for the Project this influence is associated.

Stakeholders are classified in accordance with their potential influence on the Project (X axis) and in accordance with the Project's potential influence on them (Y axis). Three categories of stakeholders are divided into key stakeholders, potentially active stakeholders and other involved stakeholders.

Those categories of stakeholders can be defined as:

- **Key stakeholders:** Stakeholders who have a high level of interest in the project, particularly regarding approvals eg Ministry of Environment, and those who are likely to experience direct impacts, eg neighboring communities, including vulnerable groups.
- **Potentially active stakeholders:** Stakeholders who are likely to voice their opinions and/or concerns about the project and who may experience indirect impacts.
- **Other interested parties:** Stakeholders that are likely to voice their opinions and/or concerns but are unlikely to experience any impacts from the project.

Table 3: Identification and prioritization of stakeholders groups

Group of Stakeholders	Stakeholders	Impact Experienced	Interest in Project	Influence on Project	Prioritization
<b>Local population</b>	Residents of Municipalities of Kavala, Nestos, Paggaios and Thasos	Local population are the stakeholders having the greatest interest in the project, due to the fact that the majority of the population of the Kavala Gulf area lives in Kavala city and nearby coastal suburbs and villages, plus Thasos Island and could potentially be affected by the project.	High	Medium	Key stakeholders
<b>Employees</b>	Employees of Energean	Employees of Energean have a vital interest in preserving their jobs, adequate working and health and safety conditions. Worker engagement activities and grievance management are managed separately under Energean human resources management and are therefore not covered by this SEP.	High	High	Key stakeholders
<b>Administrative Bodies and Authorities</b>	<ul style="list-style-type: none"> <li>Central authorities: <ul style="list-style-type: none"> <li>Management Body of the East Macedonia – Thrace National Park</li> </ul> </li> <li>Regional authorities: <ul style="list-style-type: none"> <li>Decentralized Administration of Macedonia Thrace</li> </ul> </li> </ul>	All Authorities have a key role in authorizations during all project phases (design, construction, operation), but they are not influenced by the Project.	Low	High	Potential active stakeholders

Group of Stakeholders	Stakeholders	Impact Experienced	Interest in Project	Influence on Project	Prioritization
	<ul style="list-style-type: none"> <li>○ Office of Public Defence and Emergency Response Preparedness and Readiness</li> <li>○ Deputy Head of the Region, responsible for Kavala</li> <li>• Local authorities: <ul style="list-style-type: none"> <li>○ Kavala Coast Guard</li> <li>○ Fire Brigade</li> <li>○ Regional Unit of Kavala</li> <li>○ Municipality of Kavala</li> <li>○ Municipality of Nestos</li> <li>○ Municipality of Paggaios</li> <li>○ Municipality of Thasos</li> </ul> </li> </ul>				
General public	<ul style="list-style-type: none"> <li>• General public (i.e. citizens outside Kavala Gulf areas, tourists)</li> </ul>	General public may have a general interest in the Project, but it is not affected by the construction and operation of the Project.	Low	Medium	Other involved stakeholders
Professionals	<ul style="list-style-type: none"> <li>• Fishermen corporation of Kavala</li> <li>• Aquaculture farms</li> <li>• Fishermen</li> </ul>	Fishermen are the main sea users. Although the exclusion zones are a small proportion of the overall fishing fields areas, their interest to the Project is high, due to the fact that they use the marine areas as the only source of income. Professional fishing activities were taken into	Medium	High	Key stakeholders



Group of Stakeholders	Stakeholders	Impact Experienced	Interest in Project	Influence on Project	Prioritization
		account for project design and they will always be a restrictive parameter for future project developments.			
<b>Non-Governmental Organizations (NGOs),</b>	<ul style="list-style-type: none"> <li>NGOs and associations <ul style="list-style-type: none"> <li>Ecological organization of Chrisoupoli;</li> <li>Ecological association of Kavala;</li> </ul> </li> </ul>	NGOs in the area do not have a significant influence in Kavala area and they have never expressed any opinion for the existing nor the future facilities. It cannot be assessed if they will be active in the future, so as to minimize the risk their influence is considered as medium.	Low	Medium	Other involved stakeholders
<b>Professional Associations</b>	<ul style="list-style-type: none"> <li>Professional Associations: <ul style="list-style-type: none"> <li>Technical Chamber of Kavala</li> <li>Commercial and Industrial Chamber of Kavala</li> <li>Labour chamber of Kavala</li> </ul> </li> <li>Tourism Professionals</li> </ul>	Professional associations have an economic interest in the project, either as suppliers or as organizations directly connected to the coastline and sea (tourism professionals, fishermen cooperation), thus they have a strong interest in the project. Since they are professional bodies they have the potential for lobbying or even for legal actions against the project, therefore they have a strong influence on the project.	High	Medium	Key stakeholders

Group of Stakeholders	Stakeholders	Impact Experienced	Interest in Project	Influence on Project	Prioritization
<b>Scientific Organizations</b>	<ul style="list-style-type: none"> <li>Scientific Organizations: <ul style="list-style-type: none"> <li>Fisheries Research Institute</li> <li>Municipal Enterprise of Kavala (Dimofelia)</li> </ul> </li> </ul>	Scientific organizations that are connected directly to coastline areas and sea (tourism, fisheries), may have a scientific interest in the project.	Medium	Medium	Potential active stakeholders
<b>Other</b>	<ul style="list-style-type: none"> <li>Other <ul style="list-style-type: none"> <li>Nautical club of Kavala</li> <li>Marine sports club of Kavala</li> <li>Kavala industrial area management body</li> </ul> </li> </ul>	Other stakeholders that have either no interaction with the project (ie. Kavala industrial area) or very limited (ie. marine sports club, nautical club). Marine sports and yaughting are taken place in the wider Kavala Gulf area and Northern Aegean, so there is no interference with the project.	Low	Low	Other involved stakeholders
<b>Media</b>	<ul style="list-style-type: none"> <li>Local press</li> <li>Local TV station</li> <li>Internet sources</li> </ul>	The Media will be used as the platform of notification to public of the disclosure activities. Furthermore, they can be used by stakeholders for their publications related to the project.	Low	Medium	Potential active stakeholders
<b>Organizations involved in Project implementation</b>	Construction contractors	Construction contractors are not yet known, because tender procedures are not completed. The construction (onshore assembly of pipeline, pipeline laying, platform installation and commissioning) is very short.	High	Medium	Potential active stakeholders

Group of Stakeholders	Stakeholders	Impact Experienced	Interest in Project	Influence on Project	Prioritization
Land owners	Land owners and users of land plots potentially impacted by the pipeline assembly yard (onshore construction site).	In the event that some construction activities for the offshore facilities take place on private land (the decision is still pending), there will be (a) a very limited land take only from land owners and users agreeing to the compensation terms, (b) the onshore construction period will be very short and (c) the potential land take will be minimised by the combined use of the access road adjacent to the Sigma Plant road	Low	Low	Other involved stakeholders
Specific vulnerable groups who may be impacted by the Project	None identified <sup>4</sup>		-	-	-

<sup>4</sup> No vulnerable stakeholder groups have been identified during the stakeholder identification stage since there are no ethnic or linguistic minorities in the wider Project area. Fishing activities are carried out in an organized professional fashion, thus fishermen are not considered as a vulnerable group. No refugees are transiting the Gulf area. Refugees are coming from the islands of East Aegean to Kavala by ferry lines. Kavala port has been used as a transit point only. The usual practice has been that those people have been spending only a few hours or so, before they get onto buses to continue their journey and therefore they are not really a stakeholder of this project.

## 5 STAKEHOLDER ENGAGEMENT AT DIFFERENT PROJECT STAGES

---

Stakeholder engagement was carried out and is planned for the following stages of Project implementation:

- Stage 1: Pre-project / preliminary activities
- Stage 2: Development of the Project documentation and ESIA
- Stage 3: Construction
- Stage 4: Operation
- Stage 5: Abandonment.

This Plan covers the current stage (Stage 2) and the construction and operation period (Stages 3 and 4). Activities planned for the operation stage are of preliminary character. Stakeholder engagement activities for the Project abandonment stage will be added to later versions of this Plan.

This Plan will be updated on a regular basis to reflect the progress of the Project and the stakeholder engagement process and to ensure that planned activities are adequate and effective.

Each Project stage will include measures to explain the rationale of the Project design decisions and resolve existing (if any) / prevent potential conflicts.

## 6 PAST STAKEHOLDER ENGAGEMENT

---

This section of the Plan describes engagement activities with different stakeholder groups which have been undertaken up to now (Phase 1 and partially Phase 2).

### 6.1 ESIA SCOPING

---

#### 6.1.1 Introduction

Although ESIA Scoping is not required by the National Legislation, Energean engaged with the specific institutional stakeholders to present and discuss the project specifics at an early stage. A scoping report was not submitted to the competent Authority or any other government body.

The disclosure and consultations for the Scoping stage were carried out during October 2015. They involved meetings with regional, municipal and local authorities, as well as with representatives of local scientific institutions and associations. The basic communication material was an electronic presentation (see Appendix 02).

The aim of this phase of engagement was:

- To present the existing and planned project to these stakeholders;
- To present the procedure to be followed with regards to environmental permitting;
- To discuss environmental scoping, i.e. identify main environmental parameters that could potentially be affected by either existing or planned facilities and incorporate / address any feedback;
- To present the methodology of impact assessment / mitigation plans both for routine and non-routine events
- To understand any issues raised by stakeholders, which may have had to be addressed or incorporated in project design and/or in ESIA.

#### 6.1.2 Stakeholder engagement activities

The engagement activities were in the form of meetings held in the offices of the stakeholders at Kavala, Chrisoupoli (Municipality of Nestos) and Thasos, with the exception of one meeting held in the company's offices. In some cases, meetings with different stakeholders were held. See details in Table 4 below.

Table 4: Number of meetings and participants

Date	Location / City	Number of meetings	Participants
06.10.2015	Energean (Sigma Plant), Nea Karvali	1	2
	Commercial and Industrial Chamber of Kavala, Kavala	1	10
07.10.2015	Deputy head of Region Office, Kavala	1	11
	Municipal building of Kavala, Kavala	1	8
14.10.2015	Municipal building of Nestos, Chryssooupoli	1	6
15.10.2015	Municipal building of Thasos, Thasos	1	6
<b>Total:</b>		<b>6</b>	<b>43</b>

Table 5: Meetings and stakeholders

Date	Location / City	Stakeholder
06.10.2015	Energean (Sigma Plant), Nea Karvali	<ul style="list-style-type: none"> <li>Coast guard,</li> <li>Fire brigade</li> </ul>
	Commercial and Industrial Chamber of Kavala, Kavala	<ul style="list-style-type: none"> <li>Technical chamber of Kavala</li> <li>Commercial and Industrial Chamber of Kavala</li> </ul>
07.10.2015	Deputy head of Region Office, Kavala	<ul style="list-style-type: none"> <li>Deputy Head of the Region, responsible for Kavala,</li> <li>Decentralized Administration of Macedonia Thrace / Water Directorate,</li> <li>Office of Public Defence and Emergency, Response Preparedness and Readiness,</li> <li>Regional Unit of Kavala / Environment and Water Economy Dpt,</li> <li>Regional Unit of Kavala / Agricultural Economy Dpt,</li> <li>Regional Unit of Kavala / Civil Protection Dpt,</li> <li>Regional Unit of Kavala / Programming Team,</li> </ul>

Date	Location / City	Stakeholder
		<ul style="list-style-type: none"> <li>Fisheries Research Institute</li> </ul>
	Municipal building of Kavala, Kavala	<ul style="list-style-type: none"> <li>Mayor of Kavala</li> <li>President of the Municipal Council of Kavala.</li> <li>Municipal Enterprise of Kavala (Dimofelia)</li> <li>President of Municipal Community of Nea Karvali</li> </ul>
14.10.2015	Municipal building of Nestos, Chryssooupoli	<ul style="list-style-type: none"> <li>Mayor of Nestos,</li> <li>President of the Municipal Council of Nestos,</li> <li>Municipality of Nestos / Economics Dpt,</li> <li>Municipality of Nestos / Technical Works Dpt,</li> <li>Municipality of Nestos / Programming Team</li> <li>Management Body of the East Macedonia – Thrace National Park</li> </ul>
15.10.2015	Municipal building of Thasos, Thasos	<ul style="list-style-type: none"> <li>Mayor of Thasos,</li> <li>Municipality of Thasos / Deputy mayor administrative and financial operations</li> <li>Municipality of Thasos / Deputy mayor for environment</li> <li>Municipality of Thasos / Technical services</li> <li>Municipality legal advisor</li> </ul>
<b>Total number of stakeholders:</b>		<b>27</b>

The Minutes of Meetings (MoM) documents, signed by all participants, are provided in Appendix 1 of the Plan.

The following was presented to the stakeholders in the course of the meetings:

- Scope of the meeting
- Legal framework
- Description of existing facilities
- Presentation of the new project (field development and facilities)
- Environmental and social baseline (focused on marine environment, fisheries, tourism)
- Safety studies
- Contact persons (company and consultant)
- Discussion

The presentation is provided in Appendix 2 of the Plan.

### 6.1.3 Issues raised by stakeholders and responses

A number of topics were discussed and stakeholders raised various issues. Responses to these issues were given by the Stakeholder Engagement Team. Issues raised and responses given are presented in the following table:

Table 6: Issues raised and responses given

Topic	Issue raised	Response given
Safety	<p>Accidents:</p> <p>The stakeholders raised the issue of the possibility of accidents and how this will be addressed.</p> <p>There was a question about the similarity of the project and Deep Horizon oil drilling rig, in respect of safety measures.</p>	<p>Stakeholders were informed about the 2013/30/EC Directive strict requirements on safety and that various safety studies (i.e. QRA, oil spill modelling) would be part of the ESIA. It was emphasized that the company has been operating all these years with no accidents.</p> <p>It was explained that there are no relevant technical, geological, or other similarities warranting a comparison between the two.</p>
	<p>Safety studies and design:</p> <p>Some stakeholders wanted information about specific safety studies elaborated or to be elaborated.</p>	<p>Information provided on the safety design, emergency response design, QRA, oil spill modelling etc. It was explained that these studies would be part of the ESIA</p>
	<p>Pollution incidents and Emergency Response Preparedness and Readiness:</p> <p>The stakeholders asked about past pollution incidents and how the pollution risks will be minimized.</p>	<p>It was emphasized that the company has been operating all these years with no accidents.</p> <p>Oil spill modelling will be part of the ESIA.</p> <p>Information provided, by Energean, of company's emergency response and preparedness &amp; readiness. Stakeholders were informed about</p>



Topic	Issue raised	Response given
		emergency response drills that Energean organizes for its personnel on a regular basis. Finally, the excellent cooperation with port authorities and fire brigade was noted by the company.
	Fire safety: There was a question about fire safety of the project.	Fire safety design and fire safety study are part of the overall project design. Fire safety is considered in the QRA.
Environment	Baseline data: Stakeholders were interested in environmental (i.e. bathymetry, marine mammals) and social (i.e. tourism data) baseline presented to them, during the consultation. The main issues raised about baseline were about reference data.	Energean gave information about the environmental and social parameters in terms of reference data and also informed the stakeholders about the findings of the special seismic survey and observations for the marine mammal spotted in the oil and gas field.
	Measurements and sampling: There were questions about the measurements and sampling for benthic communities, sediments and water quality. Stakeholders wanted to know about methodologies applied and findings.	Stakeholders were informed about the sampling survey for the ESIA. Information provided for the techniques, number of samples, scientific organizations that participated in the survey and main findings. It was emphasized that baseline pollution levels are normal.
	Monitoring: Stakeholders wanted to know if data from Energean's monitoring program (for the Project) could be made available.	The response was that data would be available.
	Waste management: There was a question about drilling cuts management.	The response was that drilling cuts are managed as hazardous wastes and are given to a licensed company for further management.

Topic	Issue raised	Response given
	Corporate social responsibility (CSR): Stakeholders wanted information about company's CSR.	Energean presented its CSR policy and relative actions .
Project design	Time schedule: Stakeholders wanted information about project time schedule, up to operation.	Energean presented, the permitting time schedule (mainly the environmental authorization) and provided information about the construction time schedule.
	Various questions on technical issues (i.e. dimensioning, anchoring, process)	Responses to these questions were provided .
	Distance from shores: Stakeholders wanted information about the exact distance from the coastline and towns.	The exact distances of towns in project area and coasts were provided.
Impacts	Fisheries: Stakeholders wanted information about the prohibition zones.	It was explained, that the existing prohibitions will apply. The response was there will be a 500m prohibition zone for fishing, but fishing vessel can pass through this zone.
	Navigation: Stakeholders wanted information about the prohibition zones and possible implication of navigation routes.	It was explained, that the existing prohibitions will apply. The response was there will be a 500m prohibition zone for navigation, and navigation routes do not currently interfere with the project area, in any case.
	Tourism: Stakeholders were concerned of impact to tourism due to an oil spill.	The response given was part of the discussion for pollution incidents and Emergency Response Preparedness and Readiness.

The most common issues raised are presented at the diagram below.

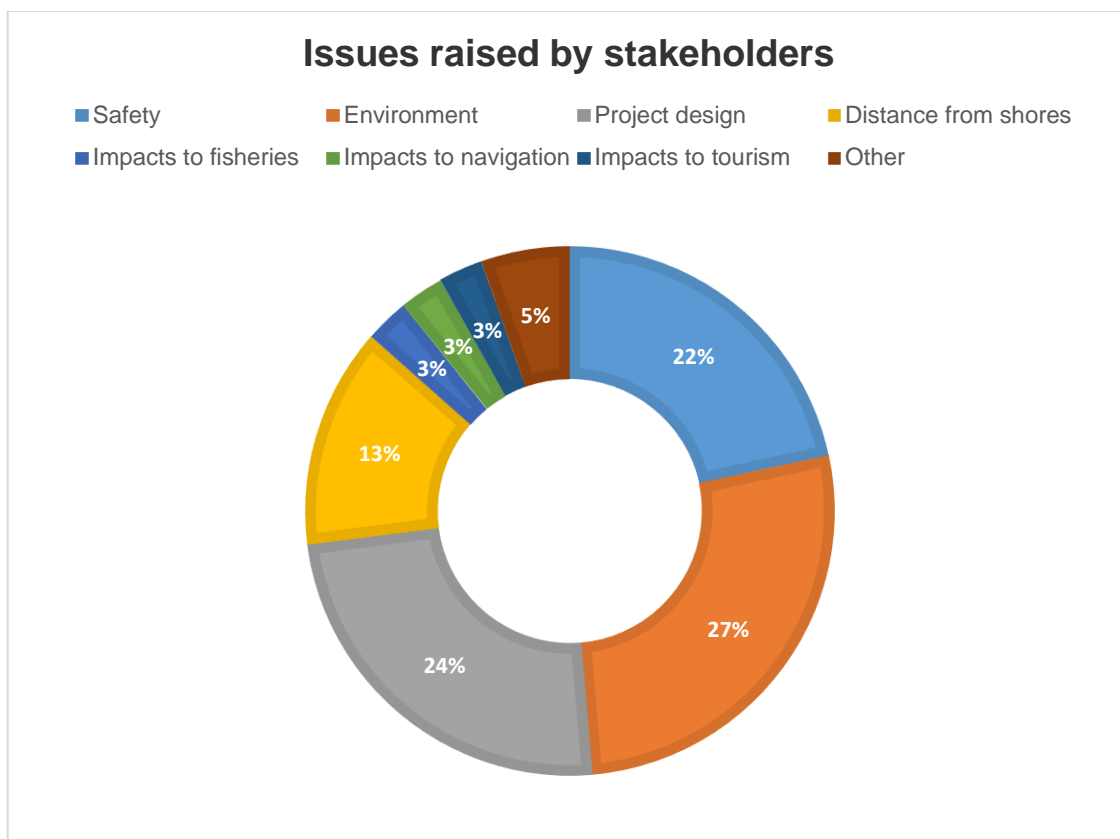


Figure 2: Issues raised by stakeholders

The issues raised during the meetings were all matters that have been assessed in the ESIA. More details on the way those are addressed are provided in Appendix 4.

## 7 FUTURE STAKEHOLDER ENGAGEMENT

---

### 7.1 ESIA STAGE

---

#### 7.1.1 ESIA disclosure

Regarding the ESIA disclosure, there are two parallel processes, one formal procedure governed by the Ministry and one that is implemented by Energean. The Company will undertake actions that are in line with EBRD Standards and go beyond the typical legal requirements. Those are further detailed below.

##### *7.1.1.1 Disclosure activities according to law*

According to the relevant legal framework (see section 3.1 of the Plan), the ESIA will be submitted to the Competent Authority (Ministry of Environment & Energy - YPEN). Following a competence check, the document will be forwarded by the Competent Authority to various central, regional and local authorities and to the Regional Council of East Macedonia – Thrace, for providing their opinion.

ESIA disclosure, in this phase, will be run by the Regional Council (see section 3.1 of the Plan). The Regional Council will notify (through media release, which will be paid by Energean) the public that the ESIA is available at a designated place in hard copy, such that the local population and stakeholders have the possibility to read it. The locations where the ESIA will be available will be determined by the Regional Council, at that time. The time period for the disclosure process, as determined by Law, is 45 days, although usually it lasts for about 60 days.

At the end of the disclosure process, the opinion and comments of the public and of other parties will be discussed in the Regional Council's Session (public hearing). The Regional Council Session will be open to the general public and to stakeholders. The date of the public hearing will be available through media release by the Region – the media release will be paid by Energean. The project developer (and associated consultants who prepared the ESIA), will be called to participate in the Session – as required by law – in order to respond to issues and questions, if any. The Regional Council will provide its opinion as well as fully detailed minutes of meetings to the Competent Authority (DIPA/YPEN), which in turn will either ask the project owner to update the ESIA and/or will directly insert particular responsibilities / terms and conditions to the environmental permits as applicable.

#### 7.1.1.2 Disclosure activities by Energean

Energean will take all feasible measures for the maximum disclosure of the ESIA to the public and to stakeholders and will establish a contact point for their comments. More specifically, prior to the official disclosure that will take place formally by the competent authority (DIPA/YPEN) the ESIA disclosure activities of the Company will be:

- The ESIA will be uploaded onto the Company's site on the same day it will be made available on EBRD's website.
- Energean will notify the public and stakeholders through media releases (in the local newspapers 'Proini', 'Nea Egnatia', 'Evdomi')\_ about the availability of the document in hardcopy in various locations in Kavala (Chamber of Commerce of Kavala, Chamber of Commerce of Chrysoupolis as well as Sigma onshore facilities) and in Thasos (at 'Makryammos Bungalows').
- In parallel the Grievance Mechanism will be activated.

Moreover, during the formal disclosure process that is totally driven by the competent authorities (DIPA/YPEN), Energean will take all actions possible to ensure that dissemination will be at the highest possible levels and any interested party will have access to the ESIA documents.

This will take place by:

- directly addressing key stakeholders with regards to the formal disclosure procedures, locations available for access to the ESIA documents and dates for the public hearings;
- assisting any interested people (individuals or groups) that have difficulty to access the documents, by providing them the necessary transport means to visit the locations. This will be done through the associated Municipalities, which will be informed and requested to provide information about the interest of potential individuals or groups.

All aforementioned actions will be done in coordination with the Ministry, in order to ensure that no breaching of the formal procedures will take place.

Finally, throughout the process of the ESIA disclosure (both Energean and formal Ministerial), Energean will be actively engaging with strategic and key stakeholders such as fishermen, tourism stakeholders (hotel associations, tour operators, etc.) and possibly environmental NGOs, prior to formal public session organized by the Regional Council, in order to make sure that all necessary information about the project is conveyed to them. This will be implemented by inviting or organising meetings with those entities, in a timely fashion well before the Regional council session takes place (see the Action Plan in 7.3. below for more details).

This will also ensure the participation of those entities in the aforementioned session, in order

for their opinions to be formally expressed.

#### *7.1.1.3 Sequence and schedule of disclosure activities*

The disclosure activities and tentative timeframe are diagrammatically presented below:

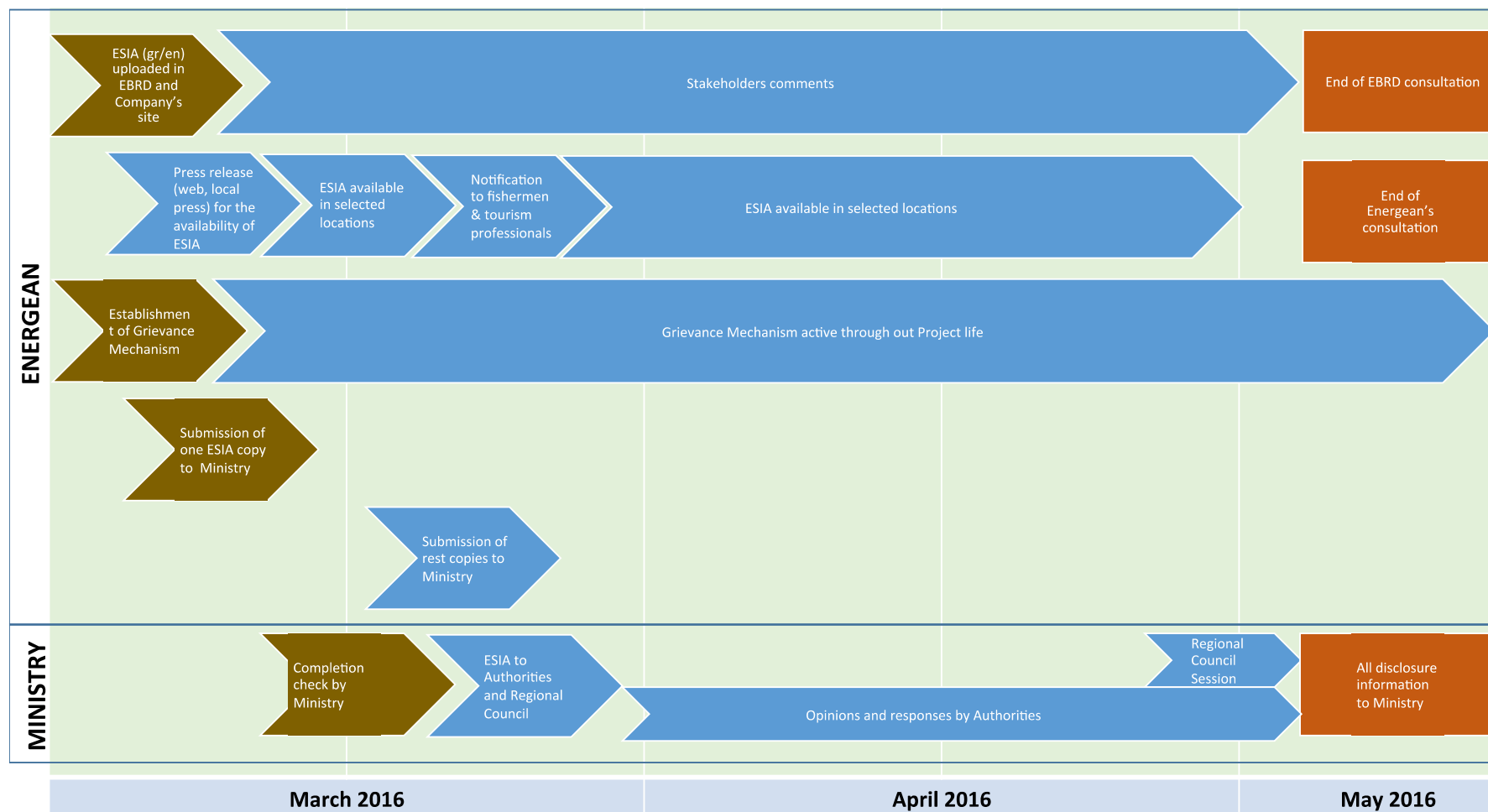


Figure 3: Flow chart of disclosure activities

## 7.2 POST-ESIA

---

The post-ESIA phase is initiated with the granting of the environmental permit by the competent authority (DIPA/YPEN). The permit is made available to the general public through two websites:

- <https://diavgeia.gov.gr>, where all decisions from all Government bodies (central and/or regional) are uploaded and are available for public view and download for further use;
- <http://website.informer.com/visit?domain=aepo.ypeka.gr>, where all environmental permits for projects classified under A1 or A2 categories, are uploaded and are available for public view and download.

### 7.2.1 Construction phase

It must be noted that the construction phase will last a very short period. The relevant stakeholder engagement actions in this phase are:

- Coordination with the naval authorities, (Kavala Port authority, Coast Guard), in order to coordinate all relevant actions required by naval laws and port regulations in relations with those activities. The authorities will then be assisting to enforce those in order to make sure that the whole process will be done with the minimum disturbance / nuisance to the maritime and fishing activities and also with all the prevention / safety and HSE elements incorporated.
- The land owners<sup>5</sup> impacted by the onshore construction site (pipeline assembly) will be identified prior to assignment of the construction contract. The construction techniques, impacts and mitigation measures will be presented to them, in a meeting in Kavala Oil offices. Land owners will be compensated according to the law.
- The approved ESIA and the Decision of Approval of Environmental Terms would be part of the Tender Documents for the construction contractor.
- The Environment Manager of Energean will inform the responsible person assigned by the Contractor for the environmental and social impact mitigation measures.

All stakeholders will have access to the Grievance Mechanism and will be free to provide any comment / complaint / inquiry regarding any issue that they may have.

---

<sup>5</sup> The impacted land plots are not yet defined, so the land owners are not currently known. It must be noted, that the pipeline assembly in land plots is one of several options under consideration (the other one is at the Karvali Commercial Harbour).



### 7.2.2 Operation phase

The key stakeholder engagement activities during operation will support the established stakeholder engagement process by:

- .
- Providing regular information about the Project and its environmental / social performance.
- Monitoring impact mitigation measures and achievement of targets (as per regulatory requirements).
- Providing feedback on effectiveness of the impact mitigation measures.
- Continued implementation of the grievance mechanism.

The main stakeholder groups during the operational phase will be fishermen and tourism professionals. The stakeholder engagement activities for these groups are:

- The Decision of Approval of Environmental Terms and the Management Plans will be presented to these groups in meetings that will be held in the Commercial and Industrial Chamber of Kavala or/and Kavala Oil offices (Sigma facilities).
- Energean will release on its website its Annual Environmental and Social Report.

The SEP is a living document that should be updated as the Project progresses. In this regard Energean will revise the current approach to operations stakeholder engagement and develop a stakeholder engagement action plan specific to the operations and decommissioning and closure phases.

It must be noted, that while consultation activities during the ESIA disclosure and the construction phases will focus on the Project, during the operation phase the stakeholder engagement actions and annual environmental and social reporting will cover all onshore and offshore operational activities.

## 7.3 ACTION PLAN

---

Stakeholder engagement actions and implementation schedule is provided in the following table:

Table 9: Stakeholder engagement and information disclosure action plan

	Actions	Target Stakeholders	Description	Timing <sup>6</sup>	Notes
1.	ESIA Stage				
	Online publication of the ESIA and availability of hardcopies	All stakeholders	The ESIA will be uploaded on the company's website ( <a href="http://www.energean.com/operations/#development/epsilon">www.energean.com/operations/#development/epsilon</a> )	04.03.16	<p>Hardcopies copy will be available immediately in Energean's Athens office (32, Kifissias Avenue, Atrina Center 151 25 Marousi, Greece, Tel: + 302108174200) and at Energean's Sigma Plant (Kavala Oil S.A.: Oil Plant, Nea Karvali, 64 006, Kavala, Tel.:+30 2510317201 )</p> <p>ESIA hardcopies will also be made available in the following locations:</p> <ul style="list-style-type: none"> <li>Chamber of Commerce of Kavala: 50 Omonias Street, 653 02, Kavala,</li> </ul>

<sup>6</sup> Timing is indicative, as it will depend on the initialisation of the disclosure process by Energean

	Actions	Target Stakeholders	Description	Timing <sup>6</sup>	Notes
					<p>Tel.: +30 2510 222212</p> <ul style="list-style-type: none"> <li>Chamber of Commerce of Chrysoupoli: 106 Venizelou, 64 200, Chrysoupoli</li> <li>Thasos: 'Makryammos Bungalows' at Limenas, Tel.: +30 25930 22101</li> </ul>
	Company's parallel ESIA disclosure activities	Local population, professional associations, NGOs	<p>All information required for the ESIA disclosure, as it will be organized by the Region, will be available in the company's site.</p> <p>The locations where hardcopies of the ESIA will be available for the public through local newspapers ('Proini', 'Nea Egnatia', 'Evdomi').</p> <p>Energean will provide the information to identified stakeholders divided into:</p> <ul style="list-style-type: none"> <li>one public meeting open to any interested or potentially impacted stakeholders wishing to attend in Kavala ,</li> <li>two meetings with tourist representatives and individual businessmen (one in Kavala</li> </ul>	<p>All activities will take place from 06.03.16 up to the Regional Council Session (estimated at 05.05.16).</p> <p>Notification to fishermen and tourism associations on 25.03.16 for meetings on</p>	<p>Meetings with public and stakeholders, fishermen and tourism professionals will take place at the Chamber of Commerce of Kavala.</p> <p>For these meetings, a presentation showing the project, the environmental and social context and the impact &amp; mitigation measures will be prepared. Also, there will be one hardcopy of ESIA and 20 copies of the Non-</p>

	Actions	Target Stakeholders	Description	Timing <sup>6</sup>	Notes
			<p>and one in Thasos), and</p> <ul style="list-style-type: none"> <li>one with fishermen association and individuals in Kavala</li> </ul> <p>At these meetings the findings of the ESIA, will be presented in order to make it clear that this is pre-permitting disclosure and respond to any questions. Moreover with regards to the formal disclosure procedures, locations available for access to the ESIA documents and dates for the session of the Regional Council;</p> <p>The company will assist any interested people (individuals or groups) that have difficulty to access the documents, by providing them the necessary transport means to visit the locations.</p> <p>Finally throughout the process of the ESIA disclosure, Energean will be engaged with fishermen and tourism professionals prior to formal public session organized by the Regional Council.</p>	<p>10.04.16</p> <p>Press releases on 01.04.16 to publisise public meeting date</p> <p>Meetings with the general public, fishermen and tourism professionals will be arranged on or around 10.04.16</p>	Technical Summary.
	Establishment and implementation of the	All stakeholders	Company's grievance forms will be available on the company's website and through the	04.03.16	All complaints and resorts shall without any fail be

	Actions	Target Stakeholders	Description	Timing <sup>6</sup>	Notes
	Grievance Mechanism		company's offices in both Sigma Plant in Nea Karvali and in Athens headquarters.  Public Relations & Media department of the Company shall have the duty for managing and handling complaints and resorts.		registered and recorded in the book of complaints and resorts. The responses to complaints will be registered, also.
<b>2.</b>	<b>Construction</b>				
<b>2.1</b>	<u>Information disclosure on the construction progress</u>				
	Inform construction contractor.	Construction contractor	The Environment Manager of Energean will inform the responsible person assigned by the Contractor for the environmental and social impact mitigation measures	Before the commencement of construction	
<b>2.2</b>	<u>Consultations</u>				
	Coordination with Naval authorities	Naval authorities (Port of Kavala, Coast guard, relevant Ministerial authorities as applicable)	Coordination with the naval authorities, (Kavala Port authority, Coast Guard), will be done in order to manage all relevant actions required by naval laws and port regulations in relations with those activities.	Before the commencement of construction	
	In the event that private land	Land owners	The land owners will first be identified and	Before the	

	Actions	Target Stakeholders	Description	Timing <sup>6</sup>	Notes
	needs to be temporarily acquired for construction activities, the Company will engage with the land owners about the impacts from construction and the compensation process. Only land owners willing to make their land available for construction activities will be affected.		contacted individually. They will be called for a presentation in Kavala Oil offices regarding the construction activities, the project and the compensation measures.	commencement of construction	
2.3	<u>Continued implementation of the grievance mechanism</u>				
	The Greivance Mechanism shall continue to be active, during the construction period.	Land owners Fishermen Tourism professionals Construction contractor	Company's grievance forms will be available in company's site and through the company's offices in both Sigma Plant in Nea Karvali and in Athens headquarters.  Public Relations & Media department of the Company shall have the duty for managing and handling complaints and resorts.	During construction period.	
3.	<b>Operation</b>				

	Actions	Target Stakeholders	Description	Timing <sup>6</sup>	Notes
3.1	<u>Project information disclosure</u>				
	Decision of Approval of Environmental Terms and the Management Plans	Fishermen and tourism professionals	Presentation in Kavala Oil offices	Immediately after Project commissioning	
	Annual Environmental and Social Report	All stakeholders	Energean will prepare a Report for its environmental and social performance. The report will be released in company's website	Annually	
3.2	<u>Consultations and monitoring</u>				
	Emission monitoring and waste management report	Ministry of Environment & Energy	The Annual Waste Report will be submitted to the competent Authorities	Annually	Information on this report will be part of the Annual Environmental and Social Report
3.3	<u>Grievance mechanism</u>				
	Maintain the Grievance Mechanism during the project operation phase	All stakeholders	Company's grievance forms will be available on the company's site and through the company's offices in both Sigma Plant in Nea Karvali and in Athens headquarters..  Public Relations & Media department of the Company shall have the duty for managing and	Continuously	The implementation of grievance mechanism will be reported on in the Annual Environmental and Social Report

	Actions	Target Stakeholders	Description	Timing <sup>6</sup>	Notes
			handling complaints and resorts.		



## 8 GRIEVANCE MECHANISM

---

The aim of the Grievance Mechanism procedure developed by Energean is to receive grievances and ensure adequate response to all complaints and appeals by stakeholders including local population affected by the Project.

The Public Relations & Media department of the Company shall have the duty for managing and handling complaints and resorts. The department will also be in contact with the responsible person in Kavala facilities (Sigma) in order to make sure it receives any complaints delivered locally. They will receive, register, communicate with the competent department and supervise responses on complaints and resorts of the interested parties.

The procedure is as follows:

- **Management and timeframe for acknowledgment of the receipt of complaints and subsequent resolution:**

All complaints and resorts shall without any fail be registered and recorded in the book of complaints and resorts. The notice of receipt of complaint / resort and registration thereof shall be given to the sender within one week. The notice shall state the date for consideration of the complaint / resort. The responses in written shall be given to all complaints and resorts made by the interested parties within 30 days. In case the complaining party is not satisfied by the response and proposed solution, the governmental supervising agencies or court may be involved to settle the problem. The grievance mechanism shall be readily retrievable from company's web site and [insert alternative way to access the grievance mechanism here].

- **Reviewing and resolving grievances:**

The report on handling complaints and resorts shall be prepared on a regular basis (at least monthly) and will be available for review (if deemed necessary) by the Company Top Management. The report shall state the essence of complaints / resorts, their soundness and measures assumed.

- **Grievance management process stages:**

Effective complaint and resort management and handling will be ensured by following the stages below:

- ⇒ Reception of a complaint
- ⇒ Registration
- ⇒ Response to stakeholder acknowledging receipt

- ⇒ Assigning of responsible person for handling/investigating the issue subject to the complaint
- ⇒ Communication of a response to the complainant and request for feedback to assess if complaint has been resolved
- ⇒ Close out
- ⇒ Recording of the particular grievance process, responsible person, and communication/feedback that occurred to resolve a given issue.

The registration book shall include the following information:

- ⇒ Issue
- ⇒ Contact details of complainant
- ⇒ Responsible person / department for addressing the issue
- ⇒ Actions to be undertaken
- ⇒ Due date
- ⇒ Proposed resolution
- ⇒ Feedback from the complainant
- ⇒ Results
- ⇒ Closing date of the issue

- **Form for complaints and resorts of individuals:**

Complaints and resorts could be either submitted in free form writing or by using the company's form for complaints and resorts that is presented in Appendix 3 of the Plan.

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

- ⇒ Energean Oil & Gas S.A., 17th floor, Atrina Center, 32 Kifissias Avenue, 151 25 Marousi, Athens, Greece, tel: +30 2108174200, fax: +30 2108174299; contact person Mr. Sotiris Chiotakis / Mrs. Alexandra Goutra.
- ⇒ Kavala Oil S.A., P.O. Box 8, 64006 Nea Karvali, Kavala, Greece, tel: +30 2510317201, fax: +30 2510317204; contact person Mr. Vassilis Tsetoglou.
- ⇒ Web site: [www.energean.com/contact](http://www.energean.com/contact)
- ⇒ E-mail: [complaint@energean.com](mailto:complaint@energean.com)

Energean's detailed Grievance Mechanism procedure is provided in Annex 3 of the Plan.

## 9 MONITORING AND REPORTING

---

The implementation of the SEP and the grievance mechanism will be monitored on a regular basis. The effectiveness of engagement activities will be evaluated against the goals and objectives set out in the Plan. This evaluation will examine the extent to which activities were implemented in accordance with the Plan and the extent to which they achieved the aims defined here. Internal reports will be provided to senior management on key complaints received, how they were addressed, information disclosed, consultation initiatives and the effectiveness of the SEP. This report will be submitted monthly during ESIA disclosure and Project implementation and may be incorporated into existing internal E&S report, particularly during the operations phase. The frequency of internal reporting would reduce to quarterly once the Project is operational. The SEP will be reviewed on an annual basis to determine its effectiveness and whether it is appropriate. Where necessary the SEP will be update and revised. Energean will maintain a database of grievances and responses.

On an annual basis, Energean will prepare an external Environmental and Social Report or Sustainability Report, which will contain information regarding:

- Information about the Project.
- Level of achievement of previous years environmental and social targets.
- Application and effectiveness of mitigation measures.
- Environmental performance, i.e. emissions, water & energy consumption etc.
- Social performance, i.e. contribution to local economy, employment etc.
- Implementation of grievance mechanism.
- Incidents reporting.
- monitoring findings.
- CSR issues.
- Next year's commitments and environmental & social targets

This report will be disclosed online starting in 2017 for the 2016 reporting year and thereafter on an annual basis.

## 10 ROLES AND RESPONSIBILITIES

---

Energean's top management has overall responsibility for the SEP. The implementation of the SEP and maintenance of the grievance mechanism will be the responsibility of designated personnel in Athens and Kavala, notably the Group HSE manager based at the Sigma Plant

More specifically:

- The responsible person for implementing the stakeholder engagement according to the plan is the Energean Group HSE Manager (Mr. Vassilis Tsetoglou).
- The responsible person for supporting the stakeholder engagement plan during the construction phase of the Project is the Project Manager (Mr. Vassilis Zenios).
- The responsible person for supporting the stakeholder engagement plan during the operation and decommissioning phase of the project is the Kavala Oil Plant Manager, (Mr. Costas Ioannidis).
- Public Relations & Media department of the Company shall have the responsibility for supporting contacts with stakeholders, according to the plan (Mr. Sotiris Chiotakis / Mrs. Alexandra Goutra).

## 11 APPENDICES

---

### APPENDIX 1 – MINUTES OF MEETING FROM SCOPING

---

## APPENDIX 2 – PRESENTATION USED IN SCOPING

---

## APPENDIX 3 – GRIEVANCE MANAGEMENT PROCEDURE

---



## APPENIDX 4 – INCORPORATION IN ESIA OF THE RESPONSES TO STAKEHOLDERS ISSUES

Issue	Response / how the issue has been addressed in the ESIA
Accidents	<ul style="list-style-type: none"> <li>The issue of accidents is part of the QRA, the Oil Spill Modelling and is addressed, also, in the ESIA (Chapter 10, Annex 07)</li> </ul>
Safety studies	<ul style="list-style-type: none"> <li>This ESIA provides the conclusions of the QRA studies performed to capture both the existing and the planned facilities (Chapter 10). The results of safety studies have been incorporated in project design and they are also part of the already existing operations (Annex 17)</li> </ul>
Project design	<ul style="list-style-type: none"> <li>This ESIA provides a detailed description of the project design including construction aspects, operation, decommissioning and timeschedule (Chapter 06). The oil field development strategy and planning is analyzed thoroughly (Chapter 03) and safety issues are addressed, also (Annex 07, Annex 17)</li> </ul>
Polution incidents	<ul style="list-style-type: none"> <li>Pollution incidents are addressed in the Oil Spill Scenario (Annex 07)</li> </ul>
Emergency response	<ul style="list-style-type: none"> <li>Emergency response is part of the safety studies (Annex 17)</li> </ul>
Firesafety	<ul style="list-style-type: none"> <li>Firesafety is part of the safety studies (Annex 17) and is examined in the QRA (Chapter 10)</li> </ul>
Baseline data	<ul style="list-style-type: none"> <li>This ESIA provides a detailed description of natural environment (with emphasis in the marine environment), manmade environment and cultural heritage. Special studies, measurements and sampling have been taken place (Chapter 08, Annexes 04, 05 and 06).</li> </ul>
Waste management	<ul style="list-style-type: none"> <li>The issue is addressed in the ESIA (Chapter 03. 06, annex 09)</li> </ul>

Issue	Response / how the issue has been addressed in the ESIA
Measurements / sampling	<ul style="list-style-type: none"> <li>Special studies, measurements and sampling have been taken place (Chapter 08, Annexes 04. 05, 06, 10)</li> </ul>
Monitoring	<ul style="list-style-type: none"> <li>A monitoring program is planned, for the purposes of the ESIA (Chapter 13, Annex 19)</li> </ul>
Distance from shores	<ul style="list-style-type: none"> <li>The distance from shores is described in the ESIA and in associated maps (Chapter 06)</li> </ul>
Impacts to fisheries	<ul style="list-style-type: none"> <li>The potential impacts to fisheries are addressed in the Impact assessment chapter (Chapter 11)</li> </ul>
Impacts to navigation	<ul style="list-style-type: none"> <li>The potential impacts to navigation and maritime activities of Kavala Gulf are addressed in the impact assessment chapter (Chapter 11)</li> </ul>
Impacts to tourism	<ul style="list-style-type: none"> <li>The potential impacts to tourism as well as to the overall socioeconomic factors are addressed in the impact assessment chapter (Chapter 11)</li> </ul>