

BTC PIPELINE – TURKEY SECTION

THE PUBLIC CONSULTATION AND DISCLOSURE PROGRAMME

The Public Consultation and Disclosure Programme that has been undertaken for the Baku-Tbilisi-Ceyhan Pipeline Project followed the IFC's manual '*Doing Better Business Through Effective Public Consultation and Disclosure: A Good Practice Manual*', which provides guidelines aimed at ensuring that consultation is both effective and meaningful. During the consultation and disclosure phase the project's goal was to make the public consultation accessible to all potentially affected parties, from national to local level. Emphasis was placed on the engagement of local stakeholders, namely people who are likely to experience the day-to-day impacts of a proposed project. The project intends that:

- i) all stakeholders have access to project information;
- ii) the information provided can be understood;
- iii) the locations for consultation are accessible to all who want to attend; and
- iv) measures are put in place to ensure that vulnerable or minority groups are consulted.

All projects such as BTC which require physical or economic displacement of landowners and users are covered by World Bank '*Operational Directive 4.30: Involuntary Resettlement* and outlined in the IFC's '*Handbook for Preparing a Resettlement Action Plan*'. The pipeline does not involve any physical resettlement, but the project is undertaking a land acquisition programme addressing the associated economic resettlement..

The Project's mitigation measures are based on the principle of "*minimizing impact*" regardless of ethnic, religious or gender differences. The Public Consultation and Disclosure Process for the BTC Pipeline project was designed to reach as many people as possible by using various methods of consultation such as the distribution of written information, announcements and public meetings, together with a clear feedback mechanism allowing all stakeholders to send their comments to the project. Although the project did not target ethnic minorities directly, the different ethnic and religious groups along the pipeline route were covered within the consultation programme.

Despite the recently amended Civil Law bringing greater gender equality to the affected areas, gender vulnerability remains a significant issue in some areas due to deep-seated traditions. Therefore, the project paid specific attention to ensure the involvement of women during the consultation and disclosure meetings by arranging separate female meetings in more conservative areas.

How the project ensured that all stakeholders (including vulnerable groups) were consulted

A number of approaches were taken to ensure all project-affected residents had equal opportunities to receive project information, raise concerns or make verbal or written comments. These included:

1. Information distribution

- Disclosure materials (22,000 community pamphlets and over 10,000 NTS and approximately 100 copies of EIAs) and feedback forms with pre-paid addressed envelopes were delivered to all of the settlements (villages, neighbourhoods, districts, provinces) in advance of the disclosure meetings both by hand and by courier to ensure that the project-affected population received the information.

- Muhtars were consulted directly about the aim of the information distribution and comments could be sent back to the project.

Muhtars were called several times requesting that the feedback forms were collated and sent to the BTC office. In the settlements where meetings were held, the meeting teams collected the feedback forms.

2. During the Consultation and Disclosure meetings

- **A comprehensive methodology** for consultation was developed to ensure that the project reached as many people as possible. Communities (representing 89% of the population) were consulted during the first round of public consultation. During the disclosure phase, community meetings were held in 36 project affected settlements, however due to separate men's and women's meetings being held in a number of settlements, the total number of meetings increased to almost 50. Representatives from a further 75 neighbouring settlements attended these meetings. Therefore, of the total 326 project affected settlements, representatives from 111 settlements had access to the disclosure meetings. All these meetings were documented with minutes and photographs.
- ***Public announcements were made in every village*** to ensure that all project-affected people were aware of the proposed meeting and to provide the opportunity to attend the meeting regardless of their ethnic or religious background. In addition to public announcements, the organization team invited people individually and encouraged them to participate in the meetings by knocking on doors and talking to villagers in their gardens. In some cases where houses were located at some distance from the meeting location, the villagers were provided with transportation.
- ***Separate women's meetings*** were held, either at a separate time and place to the men's meeting, or through private visits to individual's homes and were facilitated by the female members of the consultation team..
- ***Participants were free to make comments*** formally during the meeting or informally on a one-to-one basis following the meeting.
- ***Care was taken to ensure that time was provided for the communities to understand all the information*** and let them have enough time to raise their concerns or ask questions. The presentations on several issues were followed by an open-ended questions and answers session. The meeting teams did not leave the meeting location until they made sure that all the questions were answered and recorded.
- ***An opportunity was provided to ensure participants were able to record their concerns in writing.*** Additional feedback forms were provided to enable concerns to be provided in writing if people were hesitant to raise issues verbally in front of others.
- ***Participants who were unable to read or write*** had the opportunity to listen to presentations and verbally reflect their concerns to minute takers.
- ***Every effort was made to use simple and concise language during the meeting presentations and question and answer sessions*** to avoid misunderstanding or lack of understanding through the use of complicated technical jargon.

- Site-specific consultation meetings were held with the communities living in the vicinity of the BTC Above Ground Installations (AGIs) such as pump stations, the pressure reduction station, the marine terminal and primary camp stations to give the opportunity to affected people to raise their concerns.

3. During and after the disclosure process:

- ***A clear feedback mechanism*** was established to ensure that all communities have the opportunity to contact the project by various means.

A free telephone hotline was advertised through announcements in two national and twenty local newspapers with the widest circulations along the pipeline route. This telephone number was also written on all of the disclosure documents and on the feedback forms distributed to the communities. All Muhtars were called several times during the disclosure process to request that they collect feedback forms and send them to the project. These follow up calls ensured that the villages which were not visited also sent their comments to the project. The project team collected the feedback forms from the affected population directly during the disclosure meetings. The project postal address, fax number and additional contact names and telephone numbers were also contained in the disclosure documents and in the advertisements to ensure that anyone who wanted to contact the project office directly had the opportunity to do it. All comments received by any method are logged and incorporated into a consultation tracker database.

The extent of the information delivered to the communities:

BTC's goal is to inform the communities about the environmental and social impacts which were identified through ESIA studies and gain their feedback on the mitigation measures and management plans that were developed and reflected in the EIA. To achieve this objective, copies of the EIA Non Technical Summary (NTS) and a community pamphlet were distributed to all of the project-affected populations and the full EIA placed at a number of locations along the route. The aim was to present sufficient information about the project, in Turkish, to secure informed responses. ***Contrary to the FFM's claim, not only the positive aspects but also the environmental and social impacts were explained in all of the disclosure documents delivered prior to and during the meetings and at the disclosure meetings, with separate presentations made by relevant experts. The widely circulated disclosure documents covered the following subjects:***

The NTS addresses the following issues:

- Project background
- Public consultation
- Engineering and route selection
- Environmental and social impacts and mitigation measures
- Implementation and management

The Community Pamphlet specifically addresses the following issues:

- The environmental and social impact assessments that have been undertaken;
- Plans for pipeline and marine terminal construction, operation and ultimate closure;
- Employment opportunities;
- The land expropriation and compensation process;
- Construction camps and other temporary buildings and work sites;

- Permanent buildings/Above Ground Installations (AGIs);
- Health and safety;
- Roads and other infrastructure;
- The environment and cultural heritage;
- ‘Your involvement in the process; and
- How you can contact us if you have any comments or concerns’.

Format of the community disclosure meetings

The main objectives of the disclosure meetings were to:

- Provide information on potential environmental and social impacts and present the final range of proposed mitigation measures;
- Solicit feedback on proposed mitigation measures;
- Provide an opportunity for involvement in the consultation process;
- Raise awareness of the project.

One of the main themes of the discussions was to stress the measures that the BTC project is taking to ensure potential impacts minimised. By open and honest discussions, the aim was to allay fears and concerns, not only to stress positive aspects.

At all disclosure meetings, a presentation of the project and the draft EIA report findings was made. This was followed by an open-ended question and answer feedback session. Key representatives from BTC Co and BOTAŞ were present at all meetings and were supported by experts from the project team, international consultants ERM and Turkish specialists from KORA (Middle East Technical University) and the environmental consultancy Envy. The role of the KORA representative was not to explain the EIA findings. The social, environmental and land experts who have been directly involved in ESIA studies presented the results with specific attention to the environmental, socio-economic impacts and proposed mitigation measures. KORA’s role at the meetings was to lead the meeting, to give a general background of the project and to ensure comments were recorded objectively. Accordingly, at the beginning of every meeting the presenters introduced themselves (names, companies, responsibilities, specialised area) and the KORA representative explained his role to the communities as well as the other team members. ***Therefore, the FFM assertion that the villagers were not aware of the link between the university professors and the project is incorrect.***

Proactive discussions at the meetings

The project made a concerted effort using various methods to proactively engage the communities in consultation meetings. ***Meetings were designed to encourage open discussions with the communities rather than being dominated by a lecture format as claimed by FFM.*** The meeting team tried to keep the presentations short to give more space for open-ended “Questions and Answers” sessions. In several cases, after the Q’s and A’s session, the meeting team spent more time with individuals who wanted to discuss some issues in more detail in a more informal environment. Where possible, the project meeting teams spent time with the communities to continue dialogue after the more formal meetings and they were often invited to the houses of the Muhtars or villagers.

Additional information was also provided via provision of the NTS, community pamphlets, and display boards or exhibition panels. All comments received were recorded through official minutes and feedback

forms. In every village a large-scale map of the pipeline route was also shown to ensure everyone clearly understood the route and the extent of the project. ***Therefore all participants present at the meetings were informed about the route, contrary to the claim in the FFM report.***

A video camera was used at the national NGO and media meetings and the local NGO meetings. A photographic record of all meetings with communities, local and national NGOs, interest groups and the media was kept.

Confidentiality of the feedback forms

The BTC project assures respondents that individual feedback forms collected from the communities will be kept confidential. Only the overall results of the disclosure comments were reflected in the final EIA, which is publicly available to anyone who is interested.

BASELINE DATA GATHERING - DESIGN OF THE QUESTIONNAIRES

Criticism about the amount of project information at the beginning of the questionnaire

1. All interviewers attended a training workshop prior to the dissemination of the questionnaires in the field, of which a key component was familiarisation with project information. These workshops included sessions on the project's aims and objectives, the project background, possible social and environmental impacts, possible Qs and As, role plays and health and safety issues.
2. Consultation with local residents in the form of community meetings preceded the distribution of questionnaires. The consultation activities were held a minimum of two to three days prior to the survey. This staggering allowed local residents time to consider the information that was provided to them in the consultation process. As a result, those interviewed would have had access to project information either through attendance at the meeting, documentation distributed about the project or through existing social networks, prior to questionnaires being completed.

Vaguely phrased questions

1. The objective of the questionnaire was to gather qualitative and quantitative information.
2. In order to gather qualitative information, it is necessary to ask open-ended questions.
3. By making the questions too specific one is in danger of influencing the comments received.

Not exploring the negative impacts of the project in the questionnaire

1. All the questionnaires clearly sought responses regarding perceived impacts and concerns associated with the project. In other words, not only the expected benefits of the project but also main concerns of the households related to the project were also included in the questionnaire. (Ref. EIA Appendix A4)
2. The large number of concerns and comments recorded and addressed as part of the impact assessment is testimony to the fact that local residents felt comfortable about raising their concerns regarding the project.

3. There are questions which aim to understand the extent and locations of the fishing activity around Ceyhan terminal in the BTC Marine Terminal questionnaire (a specific questionnaire). In addition to the initial baseline data collection, three further meetings were conducted in the vicinity of the marine terminal to collect more specific information on fishing activities in order to identify the impacts of the Ceyhan marine terminal. Furthermore, an extensive fishing study has been recently undertaken to collect information on the fishing activities in Iskenderun Bay and the region surrounding the terminal. This will allow an accurate assessment of the impacts of the terminal on fishing activities during the construction and operation phases of the pipeline and also help to assess and develop effective mitigation measures.

Introductory paragraph which may bias responses

1. The paragraph may appear somewhat biased but all interviewers were thoroughly briefed on the importance of gathering concerns related to the project. This was a key aspect of the training workshop. Having received training on the project description, interviewers were not required to read the opening paragraph verbatim. In fact, the outcome of the questionnaires or consultation meetings showed that most of the households felt free in raising their concerns regarding socio-economic, land issues and environmental impacts of the pipeline (Ref. EIA Appendix 1).
2. The interviewers used were selected due to their extensive Turkish experience of social research and, as a matter of interest, are also recognized for their liberal ideologies.
3. As stated above, consultation with local residents in the form of community meetings preceded the distribution of all questionnaires.

Compilation of the Questionnaire (regarding the methodology adopted)

The questionnaire was compiled by a group of companies with extensive experience in social research and the development of tools for gathering robust baseline data, ie. qualitative and quantitative questionnaires. The questionnaire is the result of accumulated experience from well-respected national and international consulting firms. Importantly, the questionnaire was tested through an in-country pilot study prior to the actual BTC project fieldwork.

The Community Liaison Programme:

The objectives of the programme are to:

- Provide local residents affected by the project with regular information on the progress of work and implications for these settlements
- Inform the project of any community related issues that may impact construction
- Monitor implementation of mitigation measures and the impact of construction via direct monitoring and feedback from settlements
- Identify any significant new issues that may arise during the construction period
- Manage any complaints about the project from local residents (ie provide a grievance mechanism)

The responsibility for the operation of the Community Liaison Programme, and employment of community liaison staff, will be divided between BTC Co, BOTAŞ and the construction contractor. It is intended that during the construction phase the contractor will have day-to-day responsibility for

community liaison and will be the primary point of contact with affected settlements. *However, as opposed to the claim of FFM, not only the contractors but also both BOTAŞ and the BTC Co will appoint staff with responsibilities for community relations. In accordance with the role of BOTAŞ as the turnkey contractor and the assurance role of BTC Co, the team will consist of the following:*

- **BOTAŞ:** one Community Relations Manager and seven Community Relations Supervisors responsible for overseeing all works carried out by the contractors, one of whom will be based full time in the Ankara project office.
- **Contractor:** one Community Liaison Officer (CLO)
- **BTC Co:** a Community Relations Manager who will oversee all community relations activities supported by six field staff (with environmental and social responsibilities)

The community relations team of BOTAŞ and BTC Co will be empowered to stop the works if they consider, and can demonstrate, that the requirements of the Social Management and Monitoring Plan (SMMP) have not been followed. *The aim of having this three layer monitoring mechanism is to ensure that all of the EIA requirements are applied by the contractor and that the communities have more than one mechanism to use in cases where there is no response from the CLOs. Apart from the internal monitoring mechanism there will be third party monitoring during the construction phase.*

IDENTIFICATION OF ETHNIC MINORITIES

BTC cannot agree with the FFM allegation regarding the identification of ethnic groups. The project identified ethnic groups living along the pipeline route through the questionnaires completed by 1,855 households, by asking the main languages spoken by the interviewee.

Since 1965, no official data has been collected on ethnicity in Turkey. It was advised that the baseline survey should use language as a proxy for ethnicity for a number of reasons, not least because villagers themselves tend to not want to be identified as inhabiting a 'Kurdish' village and secondly, because it is insensitive to discuss ethnicity. Therefore, although all ethnic groups were identified, they were not published in the EIA village by village. *The percentages of the usage of different languages are given in the EIA (Ref. EIA, Supplement 1, and Section 5)*

Contrary to the claim of the FFM, different religious groups were also identified through the socio-economic baseline data collection and the results were assessed during the social impact assessment study. (Ref. EIA, Supplement 1, and Section 5). In fact religious differences were often emphasised more than ethnicity, with respondents in some of the villages visited rejecting ethnicity and cultural identity.

Results of consultation with different ethnic groups and with womens' groups

As stated above, Turkish citizens from whatever ethnic origin or religious group were consulted and their concerns were recorded and taken into account in the EIA and the forthcoming Resettlement Action Plan.

Analysis of the results from the socio-economic survey undertaken for the EIA and RAP shows that language/ethnic groups are unlikely to be disadvantaged by the BTC project. According to the surveys there is no statistically significant difference between Turkish-speaking people and non-Turkish speaking people in terms of potential impacts on land and their livelihoods. There is no difference in the potential

impacts of expropriation on the incomes of Turkish-speaking and non-Turkish speaking households. In other words, the project will treat all language/ethnic groups equally and fairly.

A detailed Public Consultation and Disclosure Plan (PCDP) was prepared for the Turkish section of the BTC pipeline. All details about the approach and methodology of the consultation are explained in this document, together with detailed information about the information distributed and all consultation and disclosure activities at national, regional and community levels.

INCLUSION OF THE INTERNATIONAL NGO FFM REPORT IN THE EIA

The following text is the response included in the EIA submitted to the Ministry of Environment in Turkey on 17th September 2002.

In early September, the BTC project received a letter and accompanying report from "an international NGO Fact Finding Mission" comprising the following NGOs:

- *The Corner House*
- *Kurdish Human Rights Group*
- *Platform*
- *Campaign to Reform the World Bank*
- *Bar Human Rights Committee*
- *Friends of the Earth International*

The principal findings of their report are categorised under the following headings:

- *The Host Government Agreement*
- *Consultation*
- *Land Expropriation and Compensation*
- *Ethnic Minorities*

Although the report raises a number of issues, the BTC project believes most of the issues are covered in the EIA and there is no substantial case to answer. The report, however, is under evaluation and further discussion with the authors is being undertaken directly.