

Appendix 6.1: Comments Received during the Development Phase

Comments Received during the Development Phase

Table 1 lists the comments received during the applicable Development Phase EIA/ESIA consultations and highlights where these issues raised have been considered in this ESIA Report.

Table 1 Development Phase Stakeholder Engagement

Date	Stakeholder	Document / Event	Comment / Issues / Concerns Raised	Relevant ESIA Section / Comment
Received to date	Ministry of Foreign Affairs (MoFA)	'Permit' Letter issued to Government of Russian Federation outlining conditions and requirements to be fulfilled by the Project	Do not cause any damage to fish species or production areas for fisheries products.	Chapter 8 and Chapter 9
			Notify relevant Turkish authorities of any Cultural Heritage Objectives (CHO) finds without any intervention.	Chapter 10
			Sign crossing agreements with the cable owners in the event that a cable is crossed.	Chapter 9
			Coordinate activities with relevant maritime authorities prior to construction to ensure the safe realisation of the Project.	Chapter 5 and Chapter 13
			Liaise closely with the Turkish Petroleum Corporation (TPAO) regarding the potential overlapping of activities in the Project Area.	Chapter 6, Chapter 9 and Chapter 14
12 Nov 2012	Black Sea Commission (BSC)	Introductory meeting	What kind of EIA procedure will be carried out for the Project?	Chapter 2
			Will the EIA/ESIA Reports be disclosed among parties of the Black Sea Commission, and how.	Chapter 6

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12 Nov 2012	Black Sea Commission (BSC)	Introductory meeting	What type of stakeholder engagement will be carried out? What level of government will be involved?	Chapter 6
			Have the secretariats of Espoo and Aarhus been contacted. Has the Bern Convention and SEVESO Directive been considered.	Chapter 2
			Which EU Directives have been taken into consideration?	Chapter 2 and Bulgarian ESIA Report
			Are there Natura 2000 sites in the Project Area?	Chapter 8 and ESIA Report for Bulgarian ESIA Report
			The BSC is aware that because of accidents on oil rigs, the public is sensitive to emergency issues. The possibility of accidents should be discussed, including the risk of earthquake and corrosion of the pipeline.	Chapter 13
			What is the biggest safety challenge for the Project?	Chapter 5
12 Jun 2013	MoFA	Meeting to discuss permitting procedures and CHOs	How will the Project respond if the pipeline route coincides with potential CHOs?	Chapter 10
13 Jun 2013	Petroleum Pipeline Corporation (BOTAS)	Introductory meeting	Why are there 4 pipelines? Couldn't the pipeline system be built to a bigger capacity?	Chapter 5

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13 Jun 2013	Petroleum Pipeline Corporation (BOTAS)	Introductory meeting	What benefits would Turkey receive from the Project?	This Project is not expected to generate significant direct or indirect economic benefits in Turkey during the entire lifetime of the Project. However, the potential adverse impacts of the Project are also considered to be not significant.
			What is the reason for routing through the Turkish EEZ?	Chapter 4
13 Jun 2013	TPAO	Introductory meeting on oil and gas exploration	What will be the monitoring system and what would happen in case of a leak.	Chapter 5
2 Jul 2013	Sinop Provincial Directive of Environment and Urban Affairs (PDEU) and General Public	EIA Public Participation Meeting in Sinop	How incidents will be responded to. Will there be maintenance facilities along the 470 km pipeline.	Chapter 5
			Will all commitments of the EIA Report be fulfilled by the Project owner? Often companies forget about their responsibility.	All commitments are recorded in a commitments register to be fulfilled by either South Stream Transport BV or their contractors
			Which surveys have been conducted along the pipeline route, including the Bulgarian and Russian Sectors of the South Stream Offshore Pipeline?	Chapter 7 and Chapter 8 Bulgaria ESIA Report and Russia ESIA Report

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2 Jul 2013	Sinop Provincial Directive of Environment and Urban Affairs (PDEU) and General Public	EIA Public Participation Meeting in Sinop	Has there been further analysis to validate the conclusions of the literature surveys.	Chapter 7 and Chapter 8
3 Jul 2013	MoFA	Follow-up meeting regarding CHOs	How did you establish the 150 m avoidance criteria for CHOs and is it wide enough. Were all 76 potential CHO targets checked using ROV surveys.	Chapter 10
4 Jul 2013	MoEU and Review and Evaluation Commission (REC)	EIA Scope and Special Format Determination (SSFD) Meeting	<p>Concern about impact of Project on fish population in Black Sea. Study should be undertaken by fish experts to: research potential impacts on pelagic migratory fish species and populations; investigate migration of fish across Black Sea; investigate impacts of Project on commercial fishing activities in the Black Sea and for Turkey.</p> <p>South Stream Transport should evaluate and report in detail the impact construction and operation activities will have on the fish species, and propose mitigation measures. Rearrangement of the construction schedule should be considered if there impacts on migratory fish.</p>	Chapter 8 and Chapter 9
			Oil and gas exploration is ongoing in the Project Area. The Project should assess the impacts of potential drilling in the area.	Chapter 9 and 13

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Date	Stakeholder	Document / Event	Comment / Issues / Concerns Raised	Relevant ESIA Section / Comment
4 Jul 2013	MoEU and Review and Evaluation Commission (REC)	EIA Scope and Special Format Determination (SSFD) Meeting	Maximum attention should be paid to avoiding any damage to the CHOs along the pipeline route. These CHOs need to be protected.	Chapter 10
			The pipeline crosses a military exercise area. The interface between the Project and these military areas during and after construction should be assessed.	Chapter 9
			The Project should be environmentally 'safe' and in compliance with all relevant laws, rules and regulations (Public Health Law, Environmental Law, Regulations on noise, odours and emissions, discharges, wastewaters, etc.).	Chapter 2
			Detailed description of the mitigation measures to be implemented during construction and operation concerning marine environment and environmental protection.	Chapter 7 and Chapter 8
			Assess impacts on marine traffic and provide a detailed description of the mitigation measures to be implemented during construction and operation phases concerning sea traffic and navigation safety.	Chapter 9 and Chapter 13

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4 Jul 2013	MoEU and Review and Evaluation Commission (REC)	EIA Scope and Special Format Determination (SSFD) Meeting	Detailed description of the mitigation measures to be implemented during the construction and operation concerning worker safety.	Chapter 9
			Concern about the size of the operational safety zone. Information on this should be provided to the relevant authorities to assess.	Chapter 5
			Assessments of the geology of the seabed, the type of sediments, sediment distribution and sediment movements.	Chapter 7
			Assessment of gas hydrates.	Chapter 7
			Assessment of the potential reduction in the populations of the sea plants and photosynthetic planktons in the Project Area.	Chapter 8
			Assessment of the potential impact of noise on marine species during construction.	Chapter 8
			Description as to whether any chemicals/paints will be used to protect the pipeline or the equipment to be used to fix the pipeline like piles, etc., against corrosion and fouling.	Chapter 5
			Assessment of potential impacts on marine species in case of any damages to the pipeline.	Chapter 8

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Date	Stakeholder	Document / Event	Comment / Issues / Concerns Raised	Relevant ESIA Section / Comment
4 Jul 2013	MoEU and Review and Evaluation Commission (REC)	EIA Scope and Special Format Determination (SSFD) Meeting	To state whether or not the pipeline will be tested for any ruptures and leakages before the commencement of the Operational Phase.	Chapter 5
			The environmental impact of any gas leak should be assessed.	Chapter 13
			Pipeline design standards should be reported.	Chapter 5
			Any archaeological findings should be reported.	Chapter 10
			The Project should describe its waste management procedures.	Chapter 12
			Implement Emergency Response Plans during the construction and operation for accidents, spills, leakages, etc.	Chapter 13
			Assess marine life and implement appropriate mitigation measures to monitor and prevent negative Project-related impacts.	Chapter 8
			Commitment with regard to liquid and solid waste discharges into the sea during Project activities.	Chapter 12
			Measures to be implemented if Project-related pollution from the Bulgarian and Russian Sectors of the South Stream Offshore Pipeline impacts Turkey.	Chapter 13 and Chapter 15

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4 Jul 2013	MoEU and Review and Evaluation Commission (REC)	EIA Scope and Special Format Determination (SSFD) Meeting	As construction will take place throughout 24 hour-cycles, what will be the potential impacts of the light and noise on the marine species? What mitigation measures will be in place?	Chapter 8
			Information on the distance between the four parallel pipelines.	Chapter 5
			Report monitoring procedures during operational activities.	Chapter 7 to 11
			Measures to be implemented in the event of accidents in the Bulgarian and Russian Sectors of the South Stream Offshore Pipeline which may potentially impact the Turkish Sector. Information as to compensation for damages.	Chapter 13 and 15
30 Jul 2013	Istanbul Non-Governmental Organisations (NGOs)	Comments made in person in ESIA Scoping consultation meetings	What is the impact of the pipeline on seabed sediments and the impact of heavy metals and contaminants on the seabed and marine environment.	Chapter 7
			Will there be an impact on migratory fish in the Black Sea, such as Bluefish.	Chapter 8
			What will happen if there is damage to the pipeline or if repair work is needed?	Chapter 5
			Where will the pipes and pipe-laying vessels come from? If vessels are coming from outside the Black Sea will they empty ballast water into the Black Sea.	Chapter 5 and Chapter 8

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Date	Stakeholder	Document / Event	Comment / Issues / Concerns Raised	Relevant ESIA Section / Comment
31 Jul 2013	Ankara NGOs and Fishing Groups	Comments made in person in ESIA Scoping consultation meetings	Sampling criteria / methodology e.g. for determining biodiversity value is important.	Chapter 3 and Chapter 7
			The Project should work with stakeholders and organisations and go beyond the minimal legal requirements for engagement.	Chapter 6
			What safety and security measures are in place in the event of a spill, accident or salvage operation.	Chapter 5, Chapter 13 and Chapter 15
			What sort of environmental and social programmes will the Project undertake?	A Community Investment Programme will be developed for the South Stream Offshore Pipeline
			About 75% of fishing is done in the Black Sea, and many species migrate from Bulgaria and Romania in particular. As the fish migrating from Bulgaria and Romania are very important to Turkish fisheries, construction should not occur during migratory seasons.	Chapter 8 and Chapter 9
			What will be the impact on pelagic fish from underwater noise and vibration from vessels?	Chapter 8

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31 Jul 2013	Ankara NGOs and Fishing Groups	Comments made in person in ESIA Scoping consultation meetings	The Project is unlikely to impact aquaculture as spawning cages are located 1 km offshore. However, construction support vessels may impact on spawning cages (1 km offshore) or if there is a spill/leakage.	Chapter 9 and Chapter 13
1 Aug 2013	Trabzon Academic and Scientific Organisations	Comments made in person in ESIA Scoping consultation meetings	What will be the impact of accidents, oil spills or gas leaks. What emergency plans are in place for an explosion or damage to pipeline?	Chapter 5, Chapter 13 and Chapter 15
			The Black Sea is a busy shipping route and a ship/tanker could collide with the construction vessels or could sink onto the pipeline.	Chapter 13
			How quickly can the pipeline be shut down?	Chapter 5
			Leaked gas would disperse to the shore quickly. If there was a gas leak, what would happen to the gas in pipeline? How much gas would leak if pipeline is damaged?	Chapter 13
			The density of Liquefied Natural Gas (LNG)* is lower than seawater, so in the event of a gas leak, the gas will rise to the surface and impact marine life through the water column e.g. plankton, fish and sea mammals.	Chapter 13 and Chapter 15

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1 Aug 2013	Trabzon Academic and Scientific Organisations	Comments made in person in ESIA Scoping consultation meetings	Only heard about the meeting through 'word of mouth' and did not receive a letter or invitation. Official invitations should be sent.	Formal invitation was sent to the organisation but was not forwarded to the stakeholder who attended the meeting. Stakeholder's details were recorded and additional follow-up communication sent.
1 Aug 2013	Trabzon Fishermen	Comments made in person in ESIA Scoping consultation meetings	Will sonar equipment be used to lay the pipe?	Chapter 5
			Will welding take place on-board vessels.	Chapter 5
			Why is the Project Area 2 km wide?	Chapter 5
			Does South Stream Transport work with independent organisations?	South Stream Transport has contracted URS and ELC Group to develop the ESIA and EIA Reports for the Turkish Sectors and provide support during these processes. In addition, URS has subcontracted local consultants in Bulgaria and Russia to support the Project's respective ESIA and EIA processes in those countries.

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1 Aug 2013	Trabzon Fishermen	Comments made in person in ESIA Scoping consultation meetings	Will survey data acquired during the Project be shared?	Survey data gathered to date has been shared with the appropriate Turkish authorities. Any additional survey data will be shared, as necessary, with the relevant Turkish authorities.
			Are there 'shutdown points' in the Turkish sector of the pipeline?	Chapter 5
			The Project will not impact on fishing activities because we do not fish in the Project Area and do not use trawling. However, bonito have been caught in the Project area so it is possible fishing might take place in this area again in the future.	Chapter 9
			Will construction take place during the anchovy migration period which commences from 25 October?	Chapter 8
			How much light, noise and vibration will be produced by pipe-laying vessels. Fish are affected by noise and light and the Project's activities might impact on migration routes. Could affect anchovies, which are very important to Turkish fisheries.	Chapter 8 and Chapter 9

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1 Aug 2013	Trabzon Fishermen	Comments made in person in ESIA Scoping consultation meetings	Underground power cables cannot be laid near communication cables because of interference. Your Project can also interfere with cables, so this should be considered.	Chapter 9
30 Jul 2013	NGO	Comments received via Comment Boxes	The Project does not seem to have any positive or negative impacts on Turkey.	N/A
			Fish spawning and migration routes should be taken into consideration during Project construction.	Chapter 8
			Baseline studies conducted before the Project should also be conducted after the Project for results to be compared.	Chapter 8, Chapter 9 and Chapter 10
			More effective stakeholder participation should be ensured.	Chapter 6
Unknown	Sinop General Public	Comments received via Comment Boxes	The pipe should pass overland instead of along the Black Sea seabed.	Chapter 4
4 Aug 2013	Sinop General Public	Comments received via Comment Boxes	Concerned about the safety risk to the population of Sinop if a Project-related accident or leak took place.	Chapter 13 and Chapter 15
			I hope the offshore pipeline project will solve the unemployment problem.	Chapter 5
12 Aug 2013	Sinop General Public	Comments received via Comment Boxes	Concerned about safety risks if a Project-related accident or leak took place.	Chapter 13 and Chapter 15

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12 Aug 2013	Sinop General Public	Comments received via Comment Boxes	The Black Sea coastal provinces will become more important to the Government as a result of the pipeline.	Not within the scope of this ESIA Report
5 Aug 2013	Sinop General Public	Comments received via Comment Boxes	Concerned about measures taken for the protection of the marine environment in the event of accidents.	Chapter 13 and Chapter 15
10 Aug 2013	Sinop General Public	Comments received via Comment Boxes	Further information on the Project should be provided to the Public of Sinop by local newspaper and radio.	Chapter 6
23 Aug 2013	Ministry of Culture and Tourism (MoCT)	Introductory meeting to introduce the Project and discuss potential CHO findings.	CHOs must not be damaged by the Project's activities.	Chapter 10
20 Oct 2013	TPAO	Opinion Letter from TPAO on the EIAAF	The recommended operational Safety Zone width proposed by the Project must be kept at an acceptable minimum, taking into account safety measures, to enable TPAO developments.	Chapter 9
3 Oct 2013	MoCT	Opinion Letter on the EIAAF	The Project should avoid potential cultural heritage objects identified along the route by at least 100 m for the purposes of conserving them.	Chapter 10
7 Oct 2013	MoEU-General Directorate of Environmental Management	Introductory meeting	The Black Sea is a special area, thus the Project should comply with relevant standards with regard to the discharge of waste.	Chapter 12

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Date	Stakeholder	Document / Event	Comment / Issues / Concerns Raised	Relevant ESIA Section / Comment
15 Nov 2013	MoEU-General Directorate of Environmental Management	Opinion Letter on the EIAAF	Monitoring should be undertaken if it is considered that invasive species may impact the marine ecosystem and such effects will continue after construction is completed, monitoring	Chapter 8
			The Project should provide information of the reliability and quality of the marine survey data.	Chapter 7 and Chapter 8
8 Jan 2014	MoEU and EIA REC	EIA Report Review and Evaluation Meeting	There are important oil and gas exploration activities within the Project Area, therefore keeping the pipelines as close together as possible will provide more space for exploration.	Chapter 5 and Chapter 9
			Request to take necessary measures to avoid damage to known or potential cultural heritage objects within 100 m of the pipelines; protect any new cultural heritage objects identified during surveys or pipe-laying activities and inform the relevant institutions and disclose measures to protect any new cultural heritage objects identified within 100 m of the pipeline to the relevant institutions.	Chapter 10
15 May 2014	East Black Sea Fisheries Cooperative Union	Project update meeting	Project activities in the Bulgarian Sector may disrupt the migration of fish into Turkey during January – March. This could have an impact of fish catches.	Chapter 8 and Chapter 9

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16 May 2014	Samsun Union of Fisheries Cooperatives	Project update meeting	Lighting used by the pipe-lay vessel during night works may attract fish, which could cause fishing vessels to travel further out and surround the construction spread.	Chapter 5 and Chapter 9
			The Project should inform fisheries about the Project and navigational restrictions in advance of construction works.	Chapter 6

* Note: LNG is used as an example in this comment and is not the gas being transported along the pipeline for the Project, refer to **Chapter 5 Project Description**

Complete.