

## Midia Gas Development Project

### Stakeholder Engagement Plan (SEP) – 2019

Black Sea Oil & Gas SRL

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## ABBREVIATIONS AND ACRONYMS

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

# 1 INTRODUCTION

## 1.1 Scope and Objectives of the Stakeholder Engagement Plan

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

The Stakeholder Engagement Plan (SEP) is a guiding document that maps the main categories of stakeholders who will be meaningfully engaged within the development and implementation of a project. This SEP highlights the way the company plans to communicate with these stakeholder groups who may be affected by or interested in BSOG operations and activities. It focuses on:

- Identification of stakeholders who are likely to be affected and have an interest to the project;
- Establishment of engagement methods that are suitable for each identified category of stakeholder;
- Documentation of previous engagement activities and stakeholder feedback;
- Development and implementation of the future stakeholder engagement programme, and methods of engagement;
- Introduction of the project's grievance mechanism;
- Monitoring and evaluation of engagement actions, and;
- Roles and Responsibilities

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

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

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

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

Note that the current version of SEP has been developed during the Environmental and Social Impact Assessment (ESIA) development process so that stakeholder feedback can be considered when identifying potential impacts and concerns (during the scoping phase) and determining the various impact control and mitigation actions during the ESIA preparation phase.

## 1.2 Brief Project Description

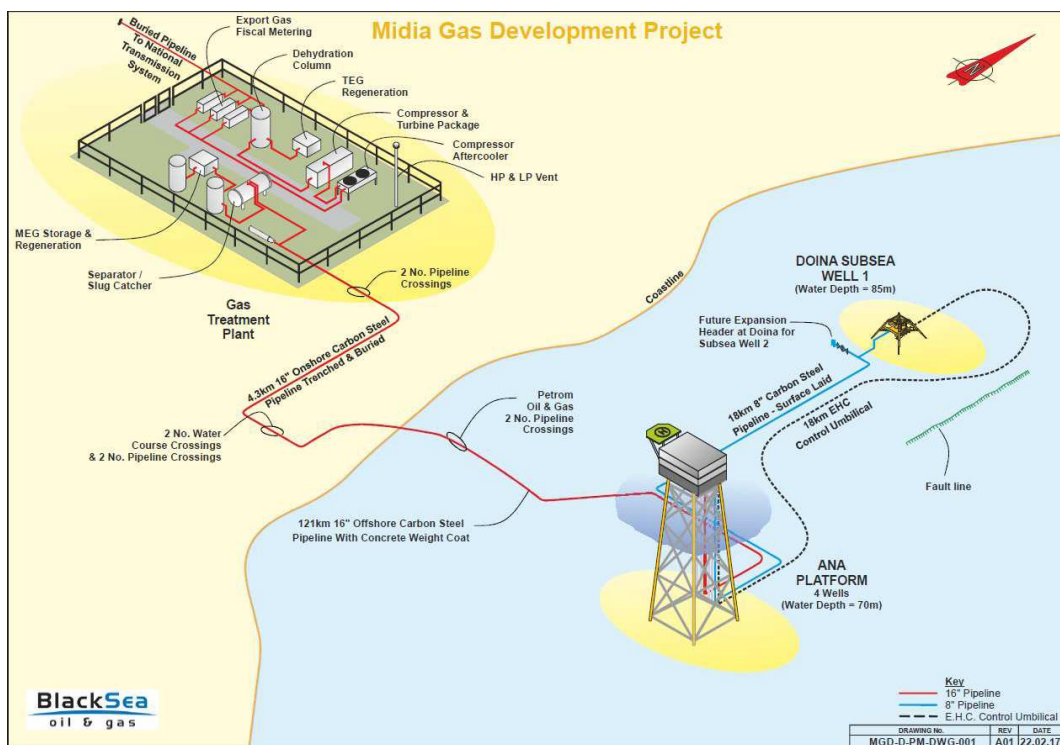
BSOG is the titleholder (together with Petro Ventures Resources SRL and Gas Plus International B.V.) and operator of the Concession Agreement for Petroleum Exploration, Development and Production in Blocks XIII Pelican and XV Midia, Contract Area B, located on the continental shelf of the Romanian Black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

The Midia Gas Development (MGD) Project will produce and process gas from the Ana and Doina discoveries located in the offshore XV Midia Block.

The MGD Project consists of drilling four offshore wells at the Ana field, where a small, normally unmanned platform will be installed to house the wellheads and production control facilities. A further well will be drilled at the nearby Doina field as a subsea development, with gas being routed to the Ana field platform via a subsea 18 km-long pipeline. The gas from both fields will then be brought to shore through a 121 km-long pipeline which will have a landfall at Vadu, Corbu Commune, Constanța County. From the landfall site, gas will be routed through a buried onshore pipeline (approximately 4.3 km long) to a new gas treatment plant (GTP) in the Vadu area where it will be treated prior to delivery into the national natural gas transmission system.

The concept of the MGD Project is presented in Figure 1.

**Figure 1 Concept for the Midia Gas Development Project**



The Project is divided into three packages as described below.

### 1.2.1 Ana offshore wellhead platform, including topsides and substructure

The facilities at the Ana wellhead platform comprise:

- 4 x platform wells;
- pipework fully rated to well closed in tubing head pressure;
- cold vent;
- helideck;
- chemical storage and injection pumps for mono ethylene glycol (MEG);
- temporary refuge/equipment room;
- lifeboat;

- facilities to enable temporary installation of pig receivers and pig launchers;
- crane; and
- minimal ancillary facilities.

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

The facilities for the offshore subsea infrastructure are:

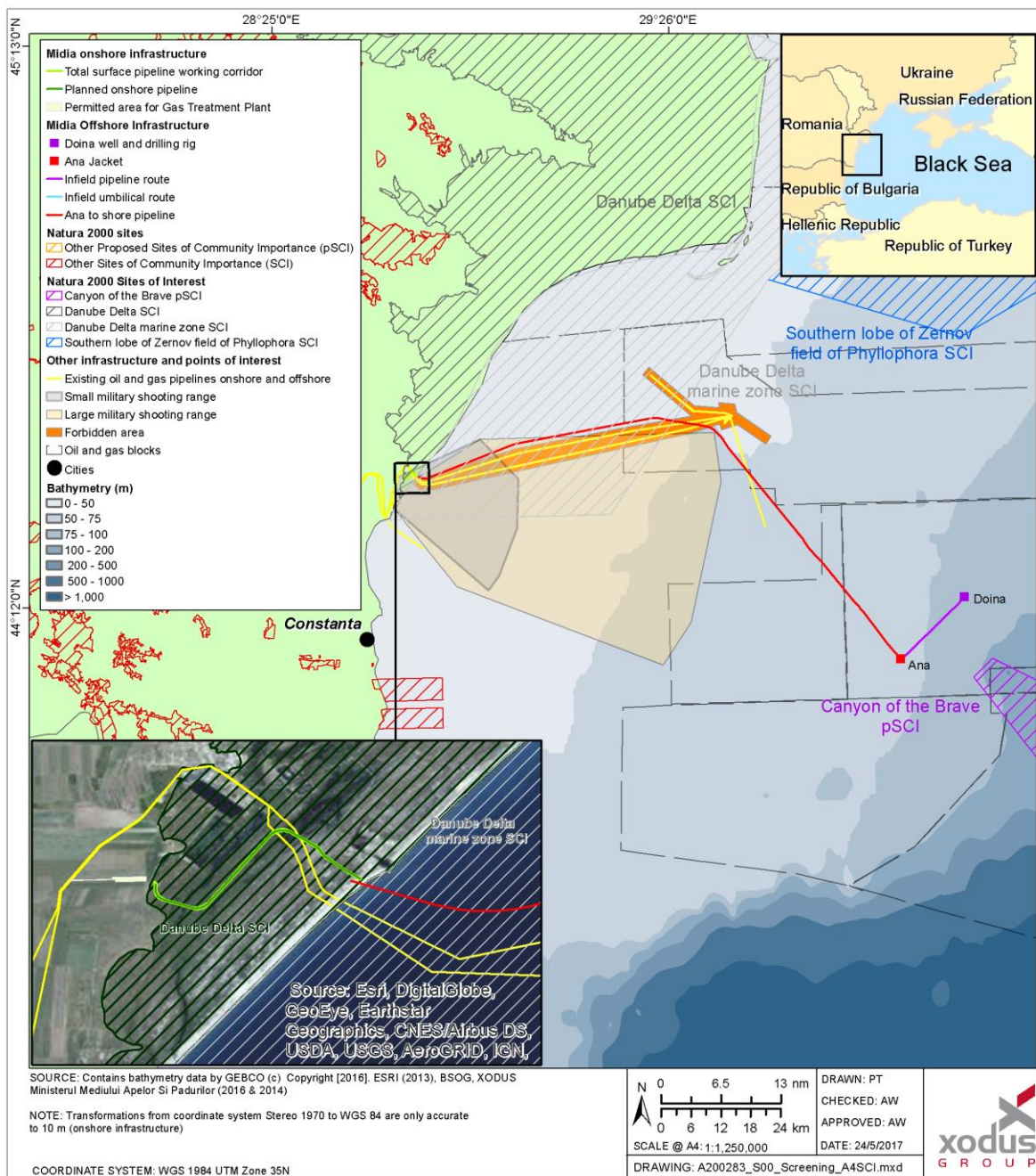
- Doina: Up to 2 x subsea wells in a daisy chain arrangement controlled via an electro-hydraulic-chemical umbilical from the Ana platform (initial development is 1 x Doina subsea well);
- Doina to Ana infield pipeline: 8-inch carbon steel pipeline with no concrete coating, continuously inhibited against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

Beach crossing: horizontal directional drilling (HDD).

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



**Figure 2 Sites of Community Importance (SCI) and Proposed SCI**



**Figure 3 Special Protection Areas (SPA) and Important Bird Areas (IBA)**

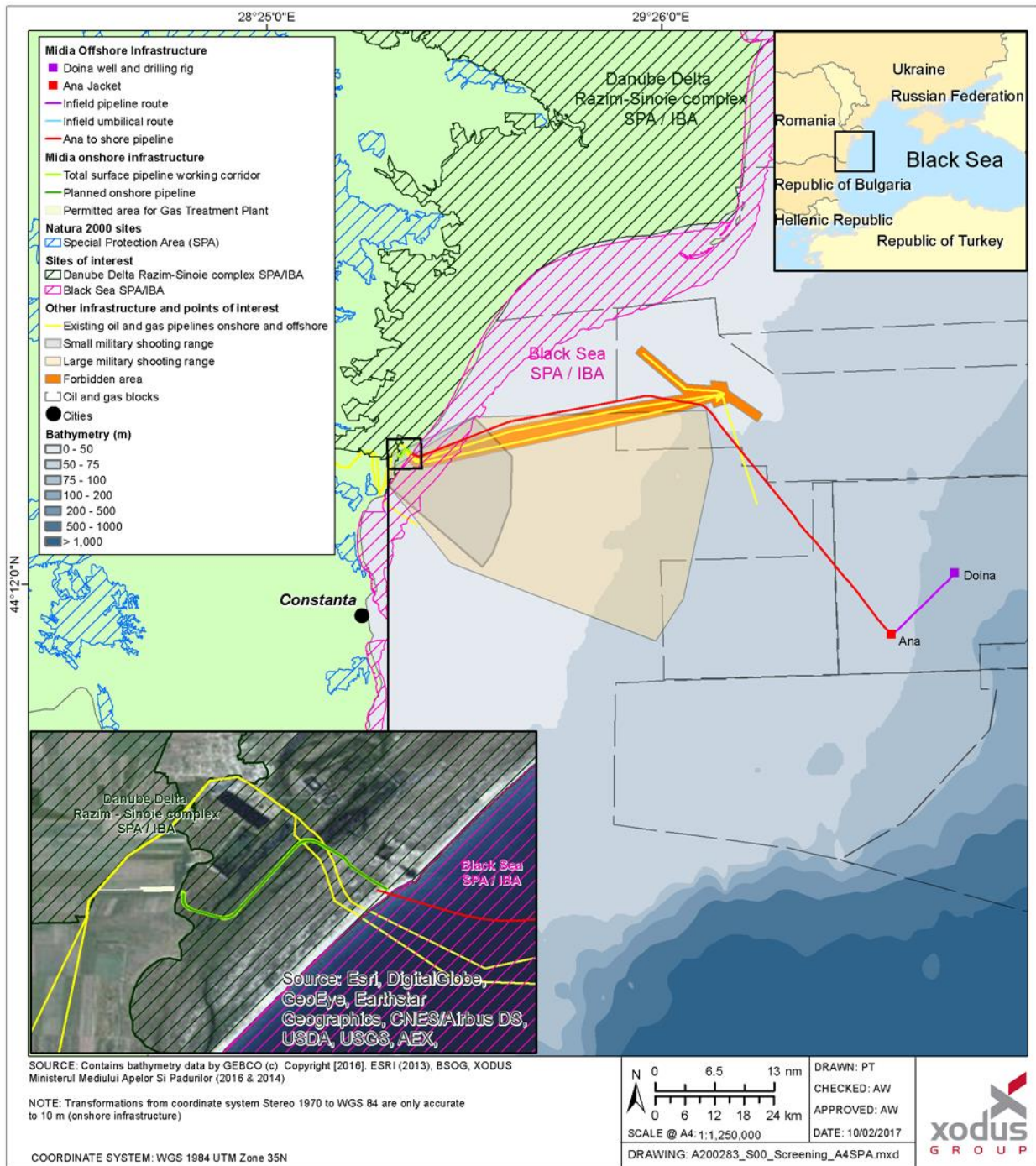




Figure 4 The Danube Delta Biosphere Reserve

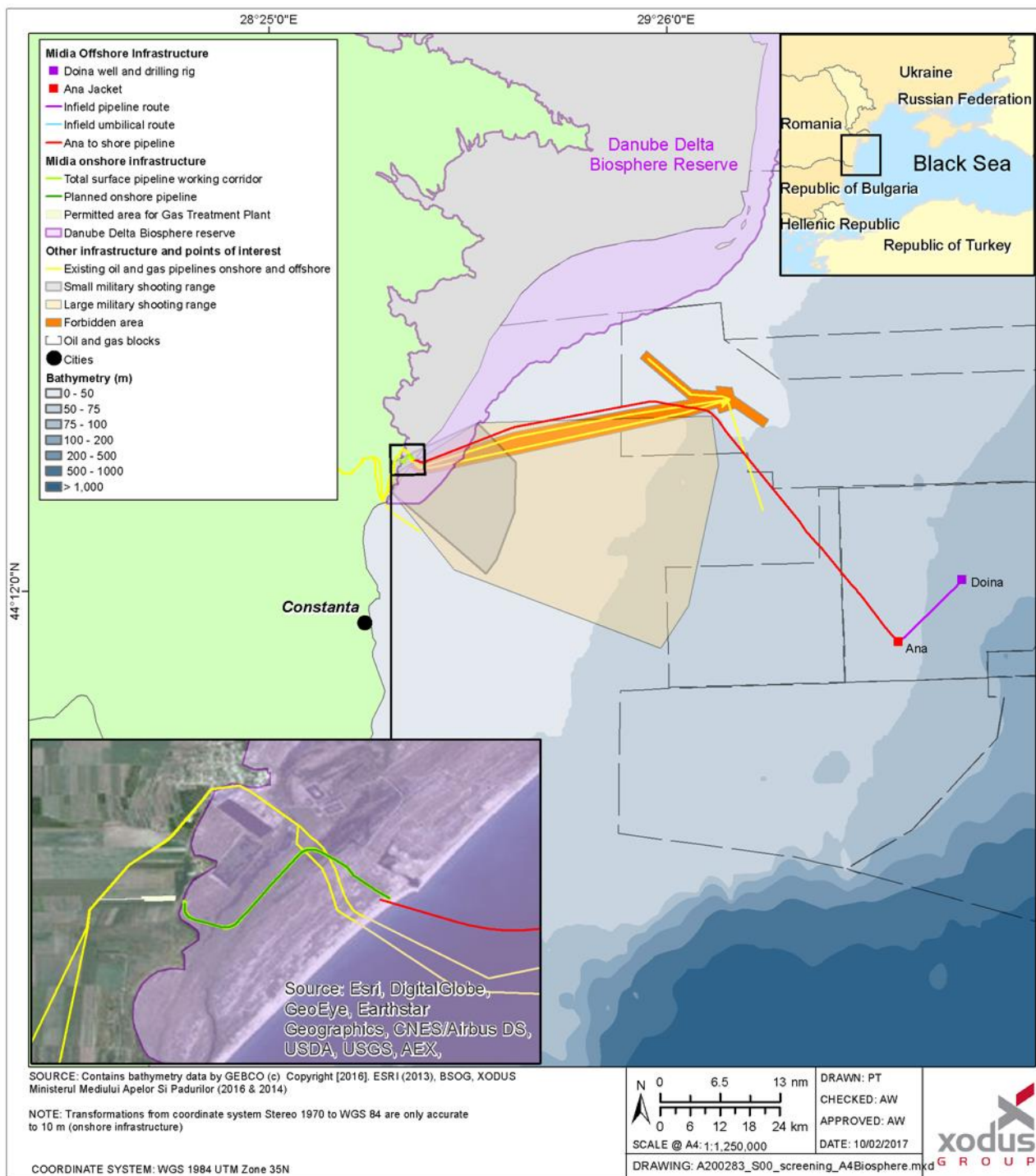


Table 1 Protected sites in the vicinity of the MGD Project, offshore section

Site name	Site code	Location relative to MGD Project
Danube Delta marine zone SCI (Delta Dunarii – zona marina)	ROSCI0066	Extends into offshore; gas pipeline crosses site over a distance of ~52 km
Black Sea SPA (Marea Neagra)	ROSPA0076	Extends into nearshore; gas pipeline crosses site over a distance of ~12 km

Site name	Site code	Location relative to MGD Project
Southern lobe of the <i>Phyllophora</i> field of Zernov SCI (Lobul sudic al Câmpului de Phyllophora al lui Zernov)	ROSCI0413	Offshore; 32 km to north from landfall
Canyon of the Brave SCI (Canionul Viteaz)	ROSCI0311	Offshore; 12.5 km to south east from Ana Wellhead Platform
Danube Delta Biosphere Reserve	n/a	The MGD pipeline crosses through the southern tip of this site, ~12 km through the marine economic area and ~4.1 km through the onshore economic area.
Black Sea IBA	RO082	Extends into nearshore; offshore pipeline crosses through over a distance of ~12 km

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

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

The facilities required for the onshore pipeline and GTP are:

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

The onshore pipeline will cross the non-built-up area of the Administrative Unit of Corbu Commune located in Constanta County.

Two settlements are in proximity to the Project (Corbu Village and Vadu Village). Vadu is the nearest settlement, located approximately 1.9 km from the GTP.

**Figure 5 Settlements and structures located near the MGD Project**



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

Also, the ROSPA 0066 Tasaul and Cobu lakes area is located approximately 6.5 km from the GTP. A 16 m-wide corridor will be required for the construction of the underground onshore pipeline. The construction corridor will cross five local unpaved access roads (De 539/80, De 539/79, De 539/78, De 522/9 and De 265). The project will follow the international standards and national legal requirements for all crossings to ensure Environmental and Social impacts are mitigated. After pipeline construction, the access roads crossings will be restored to the initial conditions.

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

A number of onshore nature protected areas are within the project area as indicated in Table 2 below.

**Table 2 Protected sites in the vicinity of the MGD Project, onshore section**

Site name	Site code	Location relative to MGD Project
Danube Delta SCI (Delta Dunării)	ROSCI0065	Onshore, pipeline crosses southern tip of site
Danube Delta and Razim-Sinoe Complex SPA (Delta Dunării Complexului Razim Sinoe)	ROSPA0031	Onshore, the pipeline crosses the southernmost tip of site; however, the GTP is located outside of this site
Lakes Tasaul – Corbu Lacurile Tasaul – Corbu	ROSPA0060	Onshore; approximately 6 km to the south west of onshore component of MGD Project
Dobrogea Gorges Cheile Dobrogei	ROSPA0019	Onshore; approximately 15 km to the west of onshore component of MGD Project
Danube Delta IBA	RO081	Extends from coastline into nearshore; pipeline crosses through over a distance of ~12 km
Lake Tasaul IBA	RO109	Onshore; approximately 6 km to the south west of onshore components of MGD Project
Dobrogei Gorge IBA	RO108	Onshore; approximately 15 km to the west of onshore components of MGD Project
Danube Delta Ramsar Site	RO521	Onshore, the pipeline crosses the southernmost tip of site; however, the GTP is located outside of this site

The project obtained all permits required for construction.

## 2 REGULATIONS AND REQUIREMENTS

### 2.1 National Requirements

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

- The Romanian Constitution, which stipulates in article 31 (1) that “a person's right of access to any information of public interest cannot be restricted” and in article 31 (2) that “the public authorities, according to their competence, shall be bound to provide for correct information of the citizens in public affairs and matters of personal interest”;
- Law no. 86/2000, for ratification of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, signed in Aarhus on 25 June 1998 (Aarhus Convention).
- Law no. 544 of October 12th, 2011 regarding the free access to information of public interest, which defines and details the free access of any person to any piece of information of public interest, which, as a general principle, constitutes one of the fundamental principles of the relationship between citizens and public authorities in accordance with the Constitution of Romania and with the international undertakings ratified by the Parliament of Romania.
- Law 544/2011 stipulates further that the public authorities or institutions will ensure that access to information of public interest shall be done ex officio or upon request, through the intermediary of the department for public relations or through the intermediary of the person appointed for this purpose.
- Governmental Decision no. 878/2005 on right to access to environmental information transposes EU Directive 2003/4/CE from 28 January 2003 (on right to access to environmental information and repealing the Directive no. 90/313/CEE) and ensures the right to access environmental information held by or for the public authorities and sets out the conditions, general terms and ways to exercise that right.
- Emergency Government Ordinance no. 195/2005, related to the environmental protection, as amended from time to time, clearly stipulates in article 5 that the state recognizes the right of any person to an “ecologically healthy and balanced environment” and for this purpose, the state warrants, inter alia, free access to environment related information, including the right of any person to be consulted during a process of making environment-related decisions (i.e. legislation, plans and programs) and the right to access to justice.
- Further, article 20 of Emergency Government Ordinance no. 195/2005 clearly stipulates that the Competent Authority for Environmental Protection together with all other local and central public authorities, if the case, will ensure proper access to information, participation of the public in specific activities related to decisions and access to justice in accordance with the requirements of the Aarhus Convention;
- Governmental Decision no. 445/2009 on environmental impact assessment pertaining to certain public and private projects. In accordance with the stipulations of G.D. no. 445/2009, the relevant information has to be made publicly available by the Investor and/or the National Authorities during each of the EIA stages listed in article 6 of G.D. no. 445/2009. Public Consultations and open disclosure of documentation connected with the Project have to be carried out and financed by the Investor in close connection with the guidance given by the relevant authority and consistently with the requirements of the relevant Romanian legislation (see in this respect, art. 16 of G.D. no. 445/2009).
- Order no. 135/84/76/1.284/2010 - Methodology for Environmental Impact Assessment for Public and Private Projects (Order no. 1284/2010), a joint document issued by the Ministry of Environment and Forests, Ministry of Administration and Internal Affairs, Ministry of Agriculture and Rural Development and Ministry of Regional Development and Tourism, as published in the Official Gazette no. 274/24.04.2010. Order no. 1284/2010 details the necessary stages for the performance of the EIA procedure, as listed in article 6 of G.D. 445/2009. In this context, Order no. 1284/2010 contains very specific and detailed information on the timing of disclosure of the relevant documents, the method of involving of the interested public, the organisation of public consultation meetings, including but not limited to the way of taking account of the comments raised/amendments proposed by the interested public, for the final EIA documentation (to be approved by NEPA).



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

## 2.2 European Bank for Reconstruction and Development (EBRD) Requirements

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

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

- Promoting transparent communication between the project promoter, its workforce, the local communities directly affected by the project, and other interested stakeholders;
- The involvement of the stakeholders has to be a process free of manipulation, interference, coercion and intimidation;
- The involvement of the stakeholders has to be adapted on the basis of the project impacts over them (direct/indirect) and their level of influence and interest towards the project. Vulnerable groups will be identified and specific actions will be undertaken to ensure that the Project will not contribute to the existing vulnerabilities and possible barriers to their participation in the engagement process are eliminated;
- The involvement of stakeholders is a process which must take place in the early stages of the project, and continue throughout the entire life of the project; and
- Ensuring access to an appropriate, fair complaints management mechanism for stakeholders to submit their questions, concerns or grievances about the project.

In line with EBRD's Performance Requirement 1 (PR1), together with PR10, engagement with the project stakeholders is an integral part of the project environmental and social impacts assessment, management and monitoring processes. PR1 requires the identification of the project's stakeholders and the design of a plan for engaging with the stakeholders in a meaningful manner to take their views and concerns into consideration in planning, implementing and operating the project. PR10 states that the process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the life of the project.

### 3 STAKEHOLDER IDENTIFICATION AND MAPPING

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

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

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

The stakeholder's identification process started at early Project preparation stages and was performed by BSOG employees during direct meetings with authorities, key stakeholders and representatives of local community (Corbu and Vadu). The stakeholders have been identified:

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

As part of the Project environmental and social impact assessment process, BSOG has also performed a vulnerability assessment as detailed in the AESIA. This assessment was based on the analysis of the local context performed as part of the impact assessment process and summarized in the ESIA Package (including the project ESIA and AESIA reports). The assessment took into consideration the socio-economic profile of the community (looking at the structure of population, their level of education, age, ethnicity, etc) in order to be able to understand if there are vulnerable persons living in the impacted communities. Further on, the assessment looked at the project activities that may potentially generate situations of vulnerability (i.e. land acquisition, traffic, dust, noise, beach crossing, and offshore activities). According to the vulnerability assessment performed, there are no persons or groups of persons in the communities that may be differentially or disproportionately affected by the project construction and operation. Therefore, no **project vulnerable groups**<sup>1</sup> were identified in relation to the project. Nevertheless the children enrolled in schools in Corbu and Vadu villages are considered as being **vulnerable persons**<sup>2</sup> in relation with the project and specific measures to address associated risks and impacts on them were defined and will be implemented during project execution in the frame of the environmental and social management system.

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

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

<sup>1</sup> In line with the EBRD requirements we have defined **project vulnerable groups** and persons as "people who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits".

<sup>2</sup> **Vulnerable persons** are defined as "people living below the poverty line, the landless, the elderly, women and children-headed households, refugees, internally displaced people, ethnic minorities, natural resource dependent communities or other displaced persons who may not be protected through national legislation and/or international law"

Environmental Protection Agency (EPA) of Constanta, Land Improvement Agency, Direction for Agriculture of Constanta, Direction of Public Health of Constanta, Prefecture of Constanta, Environmental Guard of Constanta, County Council of Constanta, State Inspectorate for Emergency Situations – Dobrogea.

- Other central authorities involved in the upcoming permitting process will also be considered as stakeholders and added in the updated version of the SEP.
- Beside the above, there are other categories of stakeholders who will be directly or indirectly engaged either at this stage or in future stages. These include the following key stakeholder groups for the overall project:
- Fishermen and Fishery organisations representing those who perform fishing activities in the project area.
- Land owners/users in the proximity of the project.
- Persons living in houses located along the roads that will be used for transporting materials and equipment
- Tourists that are using Vadu beach
- Owner of the restaurant located on Vadu beach, in the proximity of the future construction corridor.
- Women, children, elderly people and any other vulnerable people who live in the project affected villages including those villages affected by the project traffic, Transgaz pipeline project and by construction and operation of associated facilities.
- Other businesses in the region – especially other oil and gas companies that are present in the same general area as BSOG (either offshore or onshore)
- Non-governmental organizations (NGOs) – active both at international/national and/or regional/local level that are working in the fields of environmental protection, gender equality and social protection, forestry, nature conservation and agriculture.
- Media – represented by both national and local television, radio stations, newspapers and social media and other online publications.
- Community Leaders and Opinion Makers – high profile local leaders (mayor, priest, etc.)
- Public at large – all interested persons that have an interest in the project.

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

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

## 4 STAKEHOLDER ANALYSIS

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

Each identified stakeholder has been analysed from following perspectives: the project impacts on them (direct / indirect impacts), their estimated interest in the project and their potential influence over the project. Table 3 presents the main outcomes of this analysis.

**Table 3 Results of Stakeholder Analysis**

External Stakeholder	Potential Interest on the project
<b><i>Directly impacted stakeholders</i></b>	
Affected communities (Corbu and Vadu villages)	Interested in understanding the benefits and project impacts, as well as measures to reduce the negative ones.
Local key opinion leaders (Mayor, Vice Mayor, members of the County Council, priest, school director and teachers)	Interested in obtaining timely and effective information on project implementation and maximize the BSOG engagement at community level, via their CSR programme
Fishermen organisations (regional/national – not local)	Interested in understanding the restrictions for fishing, if the case and how to overcome such restrictions.
Tourists	Interested in using the beach and having no disturbance during their holiday.  (It should be noted that within the area of the Delta Danube Biosphere Reserve, informal touristic activities are taking place. BSOG is considering all touristic activities within the project area and tourists are considered key stakeholders, especially for the beach crossing section of the project)
Local businesses (especially those focused on tourism) and other businesses in the area	Interested in understanding the impacts of the project on their business activities.
Land owners/users – neighbouring BSOG land	Interested in having no disturbances on their property during construction and operational periods.
Vulnerable groups: children, elderly people disabled and any other vulnerable people who live in the project affected settlements including those affected from traffic and associated facilities	Reduce any risks for accidents during transportation
New neighbours to the GTP (farm, guest house currently being built)	Interested in understanding the impacts of the project on their business activities.
<b><i>Indirectly impacted stakeholders</i></b>	
National Authorities	Project to be developed and implemented according to national and international standards.
Regional/Local Public Authorities	Project to be developed and implemented according to national standards. Local authorities are interested in obtaining benefits for the local community.
Non-Governmental Organisations	Interested in monitoring and oversight of how the project will comply with the environmental and social provisions and commitments.



External Stakeholder	Potential Interest on the project
Mass media	Interested in understanding the project and monitoring how all provisions are complied with, especially the ones related to environment and social safeguards.
Public at large	Interested in understanding the benefits and disadvantages of the project.
Employees of BSOG	Being informed about the project Receive timely payments
Contractor employees	Good working conditions
Employee Organisations (trade unions)	Protection of workers Good working conditions
MGD gas buyer (Engie)	Interested in buying gas from the project installation.
Main contractor (GSP)/ Sub-contractors	Interested in fulfilling contractual obligations and respecting deadlines.
IFIs	Interested in implementing the project according to the time schedule and recovering loans - in case of creditors, and in maximizing investments - in case of investors.
Transgaz	Owner of the associated facility and operator of national gas transmission system interested in take-off gas production.

**Note: If you are not on the list and would like to be kept informed about the project, please liaise with BSOG by using the contact details provided in section 7 of this document.**

## 5 PREVIOUS ENGAGEMENT ACTIVITIES

Previous engagement activities have been related mainly to (1) the permitting process that started in 2014 and is still ongoing, (2) the land acquisition process that was finalised in 2016, (3) the ESIA development process, and (4) implementation of Corporate Social Responsibility (CSR) programme.

BSOG Community relations team was initially appointed on 13 March 2017 and communicated to Corbu Municipality through formal letter. The team initially comprised of: the Communications & CSR Manager, HSE Manager, Regulatory Manager. The BSOG HR Manager also joined the team in December 2018 and this update was communicated to Corbu Municipality during a meeting with the Corbu Local Council members on 18<sup>th</sup> December 2018.

BSOG has developed the first SEP in 2016. Since then, all its engagement activities are documented and properly recorded. This chapter presents the engagement activities performed by BSOG in 2017 and 2018. A more detailed description of all actions performed in 2017, including pictures and outcomes of previous stakeholders' meetings is provided in Appendix C.

Annual reports on stakeholder engagement activities performed are also disclosed on BSOG website: <https://www.blackseaog.com/sustainability/environmental-policy/>.

As specific cultural feature of the project-area countryside, rural communities are led and influenced by key opinion leaders enjoying special respect from the community members. Such opinion leaders include the Mayor, Vice Mayor, members of the Local Council, the priest, school directors and teachers. During the engagement performed to date, the preference of the local community members was to express their enquiries with respect to the MGD Project through the key opinion leaders who typically acted as ambassadors between the community and the project.

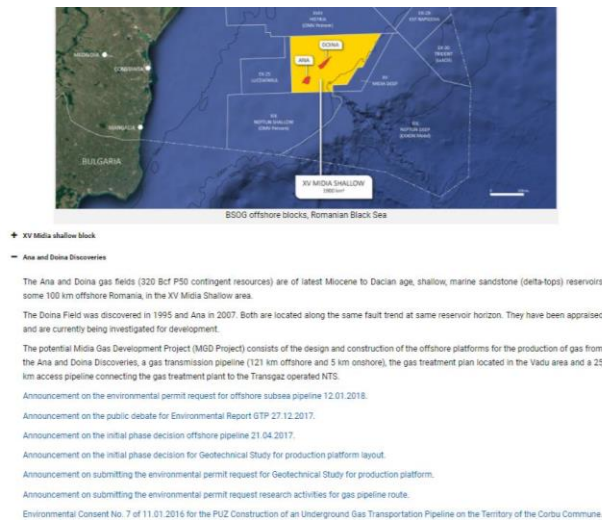
BSOG's community engagement strategy acknowledged the above-indicated and held several meetings with such key stakeholders to present the MGD project, progress status, principles of running the business, implications for the community and understand the community needs. Minutes of these meetings are available upon request.

- 10 March 2017, BSOG representatives (CEO, COO, CFO, Subsurface Director, Regulatory Manager, HSE Manager, Communication Coordinator) meeting with the Members of the Local Council, Mayor and Vice Mayor. BSOG presented the MGD Project and forwarded a plan for cooperation with Corbu Community.
- A meeting performed in September 2017 by BSOG Communication Coordinator with Corbu and Vadu school director to understand the educational needs of the community and explore the possibilities of BSOG covering part of such needs.
- 20 April 2017, meeting with the Vice-Mayor of Corbu, attended by Regulatory Manager, Communication Coordinator and HSE Manager of BSOG to get insights on the gas network connection status and organize donation of IT equipment by BSOG.
- 18 December 2018, BSOG representatives (CEO, Regulatory Manager, HSE Manager, Communication Coordinator, HR Manager) meeting with the Members of the Local Council, Mayor and Vice Mayor. BSOG provided an update on MGD Project progress status and its implications for the Corbu community. It was agreed that further meetings with the Local Council and entire community will be organized to present the roll out plan for the construction works, impact and recommendations, contingent on FID, most likely in Q1-Q2 2019. Starting from April 2017, Corbu Mayor's Office email address is included in the distribution list for all press releases and public statements issued by BSOG.

The below bullet points highlight the main aspects of our company has focused in 2017 in terms of engagement with specific stakeholders and public at large:

- **BSOG webpage** <http://www.blackseaog.com/> includes information about our offshore projects and details about the environmental and other permitting procedural steps and outcomes

**Picture 1 Snapshot of BSOG webpage – offshore projects**



### **Public Consultation Meetings during the EIA process:**

○ **3 public consultation meetings** have been organised in 2017 in Constanta and Corbu. The meetings included presentations of the different project components and the participants were consulted on the main environmental and social impacts associated with these elements. Key stakeholders invited at these meetings included: local authorities, local NGOs, oil & gas companies operating in the project area. The public meetings have been appropriately advertised both at national and local level, via different newspapers, information panel of the local authority, via face to face meetings on site, on the website of local Environmental Protection Agency and on BSOG webpage. Participants at these events expressed their support for our project and only one concern was raised by an NGO, Dominocost, through a written enquiry sent to the Environmental Protection Agency Constanta on 30<sup>th</sup> January 2018 in relation to the Environmental Impact Assessment Report for the GTP. The NGO (Dominocost) challenged a statement in the EIA regarding the overall positive climate change project impact (as result of displacement of more greenhouse gas emission-intensive fuels) suggesting it is irrelevant as the assessment is to be focused on the air emission impacts on nearby project areas including Vadu Village. Furthermore the NGO raised the fact that an urban zoning plan indicating the intention for a potential future construction of a touristic facility on land parcels within less than 150 m from the GTP has been approved. The NGO questioned whether the project and the potential future development may be in conflict e.g. as result of establishing a sanitary protection zone around the GTP that would prevent the future touristic development. Although the enquiry was raised after the formal disclosure and public consultation period of 30 days elapsed, in February 2018 BSOG replied in written form providing adequate response to the issues raised by the NGO. The answer provided guidance to the relevant sections in the EIA addressing the issues raised and demonstrating that all project impacts, including the air emissions were assessed, are within acceptable levels and aligned with the regulatory requirements. Also the answer indicated that the applicable safety zone would not exceed 30 m from the project equipment and, given the location of the project facilities within the GTP site, this safety distance does not extend beyond the fenced site boundaries. Hence the potential future development of the indicated touristic facility or of other developments is not prevented in any manner.

**Picture 2 Public Consultation Meeting – 27th of December 2017**



- **This meeting with the representatives of the Costal Area National Committee was conducted in Constanta.** The meeting aimed at presenting the urban planning document for the Gas Treatment Plant (GTP) that will be located on the territory of Corbu Municipality. The National Committee for Costal Area includes 40 members (including representatives of national authorities, ministries, local municipalities and county councils of Tulcea and Constanta, 5 NGOs, research and scientific institutions) and issued the required approval for the GTP zoning plan. The list of the Coastal Area National Committee members is provided in Appendix F.

**Picture 3 Meeting of the National Committee for Costal Area**




### **Stakeholder Engagement Activities during the Design and Implementation of Corporate Social Responsibility Programme:**

- BSOG have also designed and started implementation of its **Corporate Social Responsibility (CSR) programme** based on the Company's CSR policy (See appendix D). The BSOG CSR programme aims at developing positive community relations and create a social partnership with the representatives of the local community impacted by the Project. During 2017 several meetings were held with the representatives of Corbu Local Council, a local NGO (Corbu Cultural Centre) and the Corbu School director to understand the community issues and needs. Following the meetings, a CSR programme including 11 actions was implemented in 2017 (refer to Table 3 below). The majority of the actions part of this programme were implemented in cooperation with a local NGO from Corbu. BSOG's contribution was visible at local level as result of the support provided in the organization of different cultural events and due to the support provided to vulnerable persons from the local community.




**Table 4 CSR activities performed in 2017**

 <b>CSR ACTIONS REGISTER 2017</b>						
No.	Activity Description	Initiator	Collaboration type	Stakeholders targeted	Date/Period	Supplier
1	Centenary commemoration of WW1 - laying wreaths of flowers	Corbu Cultural Centre	sponsorship in kind	entire local community	25 May 2017	FloriConstanta.ro
2	Centenary commemoration of WW1 - lunch for relatives of WW1 veterans	Corbu Cultural Centre	sponsorship in kind	relatives of WW1 veterans	25 May 2017	D'AquaDolce
3	Centenary commemoration of WW1 - trip to the Marasesti mausoleum for the young people of Corbu and Vadu	Corbu Cultural Centre	sponsorship in kind	young people of Corbu and Vadu	02 June 2017	transport: Transevren
4	Centenary commemoration of WW1 - trip to the Marasesti mausoleum for the young people of Corbu and Vadu	Corbu Cultural Centre	sponsorship in kind	young people of Corbu and Vadu	02 June 2017	lunch at Marasesti
5	Bucharest Student Chapter of AAPG students field trip to Bulgaria in August 2017 (500 EUR)	Societatea Geologica a Romaniei	sponsorship contract	geology students, academic environment	19 June 2017	n/a
6	School start in Vadu: provision of books, pen and chocolate for 41 children enrolled in the 2017-2018 school year	BSOG	sponsorship in kind	School, Mayor's House, children	11 September 2017	Various bookshops
7	Social case of Mrs Jalba Niculina whose house collapsed, BSOG contributed with building materials to build one room	Corbu Mayor House	sponsorship in kind	Mayor's House, local inhabitants	02 October 2017	Dedeman Constanta
8	Sponsorship of charity concert initiated by ViitorPlus (national environmental and social entrepreneurship NGO) on October 22nd, Music & Forests partner package (1000 EUR)	ViitorPlus	sponsorship contract	National NGO	22 October 2017	n/a
9	National Day celebrations for young people of Corbu and Vadu (prizes for competitions)	Corbu Cultural Centre	sponsorship in kind	young people of Corbu and Vadu	01 December 2017	Emag Bucuresti
10	National Day celebration @ Vadu School (lunch for 56 children following the festivity)	BSOG	sponsorship in kind	Vadu School	01 December 2017	D'AquaDolce
11	Christmas festivities at Vadu school (gifts for 56 children)	BSOG	sponsorship in kind	Vadu School	21 December 2017	Jumbo Constanta

- Other activities supported and/or financed by BSOG in 2018 in the community are indicated in table 4 below. A photo report on CSR activities can be found in Appendix E.
- One of the most relevant CSR activities performed by BSOG consisted of technical support to local community of Corbu in the **development of a technical proposal for the extension of the gas distribution network to the local community.**

**Table 5 CSR activities performed in 2018**

 <b>CSR ACTIONS REGISTER 2018</b>						
No.	Activity Description	Initiator	Collaboration type	Stakeholders targeted	Date/Period	Supplier
1	Bucharest Student Chapter of AAPG students field trip to Ramnicu Valcea in August 2018 (1000 EUR)	Societatea Geologica a Romaniei	sponsorship contract	geology students, academic environment	01 August 2018	n/a
2	IT equipment donation (5 Dell desktops, 5 Dell units, 5 Dell keyboards, 5 Dell mouses)	BSOG	sponsorship in kind	Corbu school	06 September 2018	BSOG
3	Young oak trees planting (100 pc)	Corbu School	sponsorship in kind	Corbu and Vadu community	17 November 2018	Romsilva Agigee
4	National Day celebration @ Corbu School (stationery for Romania's flag)	Corbu School	sponsorship in kind	Vadu School	01 December 2018	Emag, Dedeman
5	4-day camp to Alba Iulia for Corbu and Vadu young people to celebrate the Centenary of Great Romania	Corbu Cultural Centre	sponsorship	young people of Corbu and Vadu	4-8 December 2018	n/a
6	Christmas festivities at Vadu school (gifts for 5 children)	BSOG	sponsorship in kind	Vadu School	18 December 2018	Decathlon, Mega Image, Carrefour

**Consultation Meetings with State Authorities:**

- Representatives of BSOG have participated in several **high-level meetings** with national authorities (including the prime minister of Romania). Also, we have been actively engaged via reviewing and offering technical support for the development of specific national legislation or different sectoral strategic and operational documents.

**Picture 4 Meeting with the Prime-Minister of Romania**



More detailed information related to actions performed in 2017 are presented in the Appendix C of this SEP.

In **2018**, BSOG continued the efforts and its commitments related to performing an effective engagement with all identified stakeholders. The following engagement tools, consultation materials and methods have been developed and used effectively by the BSOG team:

- **Updated project website** – via this website, the company constantly provides information to all interested stakeholders about the project’s development and makes public announcements about key stakeholders decisions, public consultation processes, and decisions related to permitting process; To reach out to internal stakeholders, BSOG has developed an intranet platform where employees of BSOG and collaborators that receive access can visualize important documents and receive information on project development. Also, the intranet platform has an online feedback mechanism.
- **Visual materials for educational purposes** – BSOG edited two videos about specific project activities in the offshore industry to educate the public on offshore industry dynamics, get understanding and support for its activities and endeavors. One video presents an offshore exploration drilling campaign from BSOG drilling campaign in 2018, the other is a 3D animation of the MGD Project.
- **Official letters/correspondence with national/regional/local authorities** – BSOG has fully participated in the various permitting procedures for the components of the project. These correspondences are ongoing and shall expand to cover elements of the entire project. On-going relevant engagement with a large number of authorities will continue throughout the life of the project;
- **Direct meetings** – BSOG has organized and participated various meetings with representatives of the authorities in order to explain and present the project. As an example, the BSOG representatives have participated at a meeting organized in Corbu with the members of Local Council where they have discussed and presented the project progress.
- **Study visit** in July 2018: BSOG organised a site visit with three authorities (NAMR, EPA and Corbu Mayor House) by helicopter at Paula-1 exploration well during the drilling stage.

**Picture 5 Site tour with local authorities, July 2018**



- **Direct meetings and site visits** in Corbu and Vadu for data collection necessary for preparing ESIA and AESIA – in 2017 and 2018, several meetings and site visits were performed for collecting environmental and social data required for the purposes of ESIA and AESIA. During these site visits, the representatives of BSOG and external consultants performed meetings with local authorities, residents of Vadu and Corbu, owners of local businesses, road users, other construction companies active in proximity of the project area, representatives of local NGO, etc. All the persons met considered that the BSOG project will bring benefits to the local community and have no objections or concerns related to the project construction and operation period.
  
- **Public consultation sessions** – 4 public consultations were organized in 2018 Table 5.2 below summarises the public consultation meetings held by BSOG during the permitting processes. One written enquiry was received from an NGO in Constanta on 30<sup>th</sup> January 2018 in relation to the Environmental Impact Assessment Report for the GTP. The NGO (Dominocost) challenged a statement in the EIA regarding the overall positive climate change project impact (as result of displacement of more greenhouse gas emission-intensive fuels) suggesting it is irrelevant as the assessment is to be focused on the air emission impacts on nearby project areas including Vadu Village. Furthermore the NGO raised the fact that an urban zoning plan indicating the intention for a potential future construction of a touristic facility on land parcels within less than 150 m from the GTP has been approved. The NGO questioned whether the project and the potential future development may be in conflict e.g. as result of establishing a sanitary protection zone around the GTP that would prevent the future touristic development. Although the enquiry was raised after the formal disclosure and public consultation period of 30 days elapsed, in February 2018 BSOG replied in written form providing adequate response to the issues raised by the NGO. The answer provided guidance to the relevant sections in the EIA addressing the issues raised and demonstrating that all project impacts, including

the air emissions were assessed, are within acceptable levels and aligned with the regulatory requirements. Also the answer indicated that the applicable safety zone would not exceed 30 m from the project equipment and, given the location of the project facilities within the GTP site, this safety distance does not extend beyond the fenced site boundaries. Hence the potential future development of the indicated touristic facility or of other developments is not prevented in any manner.

**Table 6 Consultation meetings held in 2018 with key stakeholders invited (local authorities, local NGOs, oil & gas companies present in the area of the Project)**

Date	Location	Purpose of the session and information presented
20.04.2018	Constanta	Consultation on the preparation of the urban planning document for the beach segment of the onshore pipeline
17.12.2018	Constanta	Consultation on the environmental impact assessment process and report for MGD-offshore component
14.01.2019	Constanta	Consultation on the environmental impact assessment process and report for MGD-onshore component
09.07.2018	Constanta	Consultation on the environmental impact assessment process and report for Madalina-1 exploration well

**Meetings with NGOs/CSOs:**

Local and national NGOs were invited to each public debate meeting organized during the environmental permitting process, however with a single exception (Dominocost which attended the GTP public debate in December 2017), no one else showed their interest in attending the debates.

**ESIA Disclosure package will be distributed to NGOs and focus groups meetings will be conducted with the key National and international NGOs as part of the ESIA disclosure process.**

- **Media coverage** – BSOG has also prepared press releases and media announcements, especially when a project milestone is achieved and whenever a public consultation session was organised; Information on MGD project progress have been published in national newspapers such as: [Ziarul Financiar](#), [G4media](#), [Capital](#), [Profit.ro](#), [Romanian Business Journal](#), etc.
- BSOG is also making use of **social media** in order to be able to provide meaningful and timely information to any interested party (approximately 1 update/month). For further information you can access the [LinkedIn profile](#), or [Youtube channel](#).
- **Internal official reports** - prepared either annually or twice a year for presenting the results of the performance monitoring and evaluation to internal stakeholders and in order to provide meaningful information to all the investors that are supporting BSOG.



## 6 STAKEHOLDER ENGAGEMENT PLAN

### 6.1 Action Plan

The following action plan has been designed for 2019 and is presented in Table 6.1. This corresponds to the permitting phase of the project, including the development and disclosure of the Environmental and Social Impact Assessment (ESIA) Report based on EBRD standards and other IFI requirements and all the other engagement activities performed by BSOG during 2019.

The objective of these external communications is to provide continuous engagement with targeted audiences to inform about the activities, performance, development and investment plans and their implementation. The exact dates and venues of the proposed activities will be communicated with the stakeholders prior to, during construction and operation phases. The tables below include detailed information on engagement actions to be performed by BSOG during ESIA disclosure process, during pre-construction and construction period and a set of generic actions that will be performed during operation period. This plan will be updated at least once per year or according to the project needs and the achieved results.

#### 6.1.1 ESIA DISCLOSURE PROCESS:

##### ***Disclosure of the ESIA documentation:***

BSOG will disclose the following documents through Company website for 60 days for public review and comments:

- Environmental and Social Impact Assessment (ESIA),
- Additional Environmental and Social Impact Assessment (AESIA),
- Stakeholder Engagement Plan (SEP) - this document
- Livelihood Restoration Plan (LRP)
- A Non Technical Summary NTS,
- Environmental and Social Management and Monitoring Plan (ESMMP) and,
- Environmental and Social Action Plan (ESAP).

All the above information will also be made available in hard copy and on USB flash drives for take away, at:

- BSOG headquarters in Bucharest
- Municipality of Corbu (Primaria Corbu)
- School located in Vadu village.

##### **Stakeholders' engagement during ESIA disclosure process:**

During the 60 days disclosure period, BSOG team will engage with several stakeholders in order to collect any feedback that they might have on the ESIA documentation. The following key stakeholders will be in particular engaged:

- representatives of NGOs active in nature conservation at national and international level and NGOs with activities focused on Black Sea region
- representatives of local authorities from community of Corbu and Vadu
- representatives of Ministry of Environment and local Environmental Protection Agency of Constanta
- representatives of local community, especially representatives of local touristic business and key opinion leaders from Corbu and Vadu.

The engagement plan presented in the table below includes detailed information on specific engagement methods for each type of stakeholders.

**Reporting:**

At the end of the 60 days ESIA disclosure process, a Public Consultation Report will be prepared and publicly disclosed on the BSOG website to document the activities conducted during this ESIA disclosure period and present the comment and concerns raised by the stakeholders engaged. This Public Consultation Report will provide details of the various communication methods that will be used and the feedback provided by stakeholders. It will also provide information on how BSOG will take into account the concerns raised by stakeholders; either by including them in the Supplementary Studies, or in the design, construction and operations of different project components.

**Table 7 Stakeholder engagement programme during ESIA disclosure process (May – June 2019)**

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location	Responsibilities <sup>3</sup>
All	Website  Press releases and social media coverage (key stakeholders included in the distribution list)	To provide access to information in a timely and efficient manner	Disclosure of ESIA documentation (ESIA report, ESAP, SEP, ESMMPs, etc.)  Provide information about: Finalization of ESIA documentation	BSOG website/ EBRD website  BSOG office/ national and local newspapers	BSOG Communication & CSR Manager  BSOG: Communications & CSR Manager

<sup>3</sup> Further information on the responsible person from BSOG is presented in the contact sheet attached to present document

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location	Responsibilities <sup>3</sup>
	Grievance mechanism	Ensure that all project related grievances are fully addressed	<ul style="list-style-type: none"> <li>• Record receipt and document all grievances received or identified, including filling out case details (General Information, Reported Party and Incident or claim Description/consequences sections) in the Grievance Analysis Report form (format included in Attachment 2) in readiness for the BSOG Grievance Committee meeting</li> <li>• Maintain central log of all grievances ensuring it is kept up to date with current status</li> <li>• Act as member of the BSOG Grievance Committee</li> <li>• Prepare minutes of BSOG Grievance Committee Meetings, formally recording all decisions made by completing the Analysis, Analysis Results and Decision sections in the Grievance Analysis Report form for the case</li> <li>• Prepare responses to grievance raisers and agree content with other members of the BSOG Grievance Committee</li> <li>• Issue all responses to grievance raisers and ensure BSOG Management Team are informed</li> </ul>	BSOG office	
			<ul style="list-style-type: none"> <li>• Comments and suggestions received during the ESIA disclosure and further on, during project implementation period, will be considered by BSOG and incorporated in the ESMPs if relevant.</li> </ul>		

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location	Responsibilities <sup>3</sup>
	Public consultations	To provide information and consult interested parties	Provide information about the project's impacts and mitigation measures As of today, BSOG envisages to organize a public meeting for ESIA disclosure that would take place in Corbu	Corbu municipality – June 2019	BSOG Communications & CSR Manager
Environmental Protection Agency of Constanta and representatives of Ministry of Environment	Official correspondence	To offer information about ESIA documentation	Provide information related to the project and the ESIA process, decisions related to project stages, inform them about the disclosure procedure and consult them on the main outcomes of ESIA.	BSOG office – May 2019	BSOG: Regulatory & PGA Manager
Local communities – Corbu and Vadu	Public consultation	To offer information on ESIA documentation	Provide access to ESIA documentation by posting a printed copy of ESIA at local municipality. Representatives of local communities will have to possibility to consult the ESIA documentation at the premises of the municipality	Local municipality office / School in Vadu – May – June 2019	BSOG: Regulatory & PGA Manager
Residents of Corbu and Vadu living along the roads used for MDG project	Leaflets		Prepare a small leaflet with specific information on project impacts on local communities and envisaged mitigation measures. Distribute the leaflet to all Corbu and Vadu inhabitants and during the public meeting where ESIA is presented.	Corbu municipality – May 2019	BSOG Communications & CSR Manager
Key opinion leaders from community and other persons from Vadu/Corbu community	Direct meetings	To offer information timely and effective information on ESIA documentation	Provide meaningful and timely information on project implementation status – at least 2 meetings with key opinion leaders, one from Corbu and one from Vadu	Corbu and Vadu - June 2019	BSOG Communications & CSR Manager



Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location	Responsibilities <sup>3</sup>
Owner of restaurant located on the beach	Direct meetings	Understanding the community concerns, needs and expectations,	Presenting the ESIA documentation	Vadu beach – June 2019	BSOG: Communications & CSR Manager
Local and international NGOs and CSOs	Direct meetings	To offer information timely and effective information on ESIA documentation	Collect feedback on ESIA documentation	NGOs offices or BSOG office	BSOG: Communications & CSR Manager
International organisations active in Black Sea region (e.g. Black Sea Economic	Official notification / correspondence	Ensure that information is correctly and timely disseminated	Provide information on ESIA	BSOG office	BSOG: Communications & CSR Manager
Mass media	Press releases and social media coverage	Offering timely information	Provide information about: <ul style="list-style-type: none"> <li>- period of time of the public consultations sessions</li> <li>- Finalization of ESIA documentation</li> </ul>	Local/ Regional newspapers that are accessible to residents of affected communities- June 2019	BSOG: Communications & CSR Manager

**Table 8 Stakeholder Engagement Action Plan – during pre-construction and construction period (May 2019 – end of 2021)**

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location / estimated timeline	Responsibilities <sup>4</sup>
All	Public consultations	To provide information and consult interested parties	Provide information about the project's impacts and mitigation measures As of today, BSOG envisages the following public consultation meetings that will take place in 2019: <ul style="list-style-type: none"> <li>meeting with Local Council – future steps in project development</li> <li>local NGOs / community representatives - meeting for development of CSR plan for 2019</li> <li>local public consultation – after FID decision and FDP submission</li> </ul>	Corbu municipality  June 2019  July 2019	Local environmental authority  BSOG Communications & CSR Manager
	Public debates	To provide information and obtain feedback on certain documents	Provide information on EIA documentation for onshore pipeline	Constanta – May 2019	Local environmental authorities BSOG: Regulatory & PGA Manager
National / Local Authorities	Official correspondence	To offer sufficient information about the project, to identify any concerns and to obtain the	Provide information related to the project, decisions related to project stages, etc.	National / Central authorities	BSOG: Regulatory & PGA Manager

<sup>4</sup> Further information on the responsible person from BSOG is presented in the contact sheet attached to present document

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location / estimated timeline	Responsibilities <sup>4</sup>
		necessary permits			
Local communities of Corbu and Vadu	CSR programme	Social licensing of the project	<p>BSPG will continue to implement the CSR programme and will intensify their community engagement during this year. The previous experience with working with a local NGO proved to be mutually beneficial.</p> <p>Thus, BSOG will conduct a community profile and need assessment together with local NGO in order to be able to adapt the CSR programme to the community needs and to balance it with the project scale.</p>	<p>Corbu and Vadu – yearly programme</p> <p>By end of September 2019</p>	BSOG Communications & CSR Manager
Owner of restaurant located on the beach	Direct meetings	Address their concerns and expectations (if any)	Presenting the project construction phases and envisaged construction work that would occur close to the restaurant	Corbu and Vadu villages – August 2019	BSOG: Communications & CSR Manager
Children enrolled in schools of Vadu and Corbu	Direct meeting	Reduce / avoid any incident/accident	Presenting the key health and safety aspects	Corbu and Vadu villages – August 2019	BSOG: Communications & CSR Manager
Tourists <sup>5</sup>	Information board	Mitigate the negative impacts associated with restriction imposed for	Provide information on the project activities, restriction and mitigation	Information boards will be installed at the entrance point of VAdu Beach 2 weeks prior to	BSOG: Communications & CSR Manager

<sup>5</sup> It should be noted that according to the implementation schedule, the beach crossing activities are planned during February – March 2020. This is outside the touristic season. Thus, no measures are required for engagement with tourists. The above action is foreseen only in case the beach crossing activities will occur in the summer time, from June to September

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location / estimated timeline	Responsibilities <sup>4</sup>
		beach users during beach crossing activities	measures	construction activities	
Contractors	Direct meetings Reporting	Ensure that project is correctly and timely implemented	Provide required information Regular updating meetings with main contractor Site visits for observing the progress and for monitoring purposes (based on monitoring plan and internal audit requirements) Discuss the monthly progress reports	Construction site – during construction	BSOG: Technical department Project manager
Transgaz (Gas Transportation Operator)	Direct meetings Reporting	Ensure that project is correctly and timely implemented	Joint meetings at community level to inform about the two complementary projects (BSOG and TG projects)  Technical meetings for discussing project design / technicalities  Regular meetings (quarterly) – project progress  Redirecting received grievances	Local community – prior to start of construction – estimated time – September 2019  During pre-construction period  Ongoing – during project construction	BSOG: Technical department
IFIs	Reporting  Direct meetings (when needed)	Ensure that information is provided on a timely and efficient manner	Project Progress Reports Monitoring meetings	BSOG office IFI office	BSOG: CFO
Mass media	Press releases and social media coverage	Offering timely information	Provide information about: - the project development -start of the construction - imposed	Local/ Regional newspapers that are accessible to residents of affected communities/when necessary	BSOG: Communications & CSR Manager



Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location / estimated timeline	Responsibilities <sup>4</sup>
			restrictions - official mass media articles / answers to official request for public information - development of information movie (bilingual) on project construction steps – onshore/offshore – publish the movie on website/social media (linkedin/ youtube)	Social media	

During the operations period, BSOG will implement a stakeholders engagement plan that will be developed during the construction period, based on the feedback and strategy established for such phase. A detailed plan for 2021 will be provided in 2020.

**Table 9 Stakeholder Engagement Action Plan – generic actions during operation period**

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location and period of disclosure	Responsibilities <sup>6</sup>
All	Website  Press releases and social media coverage	To provide access to information in a timely and efficient manner	Project operation reports	BSOG website / EBRD website  BSOG office / national and local newspapers	BSOG Communications & CSR Manager
	Meeting	Launching event for GTP operation	Technical description of GTP and offshore infrastructure	GTP Vadu	BSOG Communications & CSR Manager
IFIs	Reporting	Ensure that	Project Progress	BSOG	BSOG: CFO

<sup>6</sup> Further information on the responsible person from BSOG is presented in the contact sheet attached to present document

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location and period of disclosure	Responsibilities <sup>6</sup>
	Direct meetings (when needed)	information is provided on a timely and efficient manner	Reports Monitoring meetings	office IFI office	
Local communities of Corbu and Vadu	CSR programme	Social licensing of the project	BSPG will continue to implement the CSR programme during operation period.	Corbu and Vadu – yearly programme	BSOG Communications & CSR Manager
National / Local Authorities	Direct meeting	Inspections /Permitting	Information related to operation	BSOG offices / both in Bucharest and Vadu GTP	BSOG: CFO
Children and students	Study visit	Information on GTP operation / research , educational purposes	Technical information on GTP operation and offshore operation	GTP	BSOG Communications & CSR Manager

## 6.2 Record keeping

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

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

## 7 GRIEVANCE MECHANISM

The current grievance mechanism is referring only to external stakeholders and workers contracted by BSOG. The detailed grievance mechanism for external stakeholders is included BSOG internal procedure BSOG-GV-PRO-001-D02. A dedicated grievance procedure for internal stakeholder is included in HR Handbook available at BSOG.

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

Any request, objection, complaints or proposal filed by any stakeholder related with the project will be classed as a grievance. The stakeholders have the possibility to file anonymous grievances, which will be taken into account and resolved following the same basic steps as with non-anonymous grievances, with the mention that in this case the stakeholder will not receive a formal answer to its complaint. The anonymous grievances have to be recorded in the grievance register as any other regular grievance.

A stakeholder may raise a grievance related to any BSOG operation during the development and commissioning of the MGD project. Also, a stakeholder may also raise a grievance related to projects developed by other parties in proximity of the BSOG operational areas or other facilities that are considered as associated with BSOG operational areas. All these grievances will be recorded within BSOG grievance register and re-directed towards the other project developers. BSOG will provide written answer to the known persons whom filed in such grievances informing that their grievance was redirected towards another project developer (offering also the contact details of the person/institution where the grievance was redirected).

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

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

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

- A simplified grievance template that will be available at Corbu Municipality. The template will be available in the mayor's office and anybody interested in any aspect of the project can lodge it whenever necessary. BSOG will collect lodged grievances once per week. Appendix A includes an English language version of this template; the Romanian language template is the official version.
- A direct phone number and email address from BSOG community engagement manager will be provided to all interested parties for enabling them to contact BSOG's representatives whenever necessary (please also see Appendix B Contact List – Grievance Mechanism).
- Direct meetings with representatives of local communities where they can raise their complaints and/or suggestions, verbal complains.
- Online complaint form that can be easily filled in by any interested party posted on BSOG's website shall be functional by 1st April 2019 .
- Public statements: where statements made in the public domain (e.g. in the press, on television, on social media etc.) are considered to be grievances these shall be recorded and documented by the BSOG CO for further processing per this procedure.

A complaint is considered to be valid if it is submitted using one of the above-mentioned channels. All valid complaints received during the project ESIA disclosure and implementation process will be processed



and registered by CO in a dedicated grievance log. BSOG should keep these grievance registries in order to track all grievances and to be able to present these registries upon any request from EBRD or other relevant entity. The period of time for registry keeping and the methods for archiving documents should be established by internal procedures.

The central log will include the following information:

- Date lodged by complainant or date received by CO;
  - Contact details of complainant;
  - General information
  - Actions to be undertaken;
  - Due date;
  - Decision;
  - Feedback from the complainant;
  - Results; and
  - Closing date of the issue.
- Close out form signed of by the complainant will be obtained and registered into the system.

The BSOG Grievance Committee is responsible to review all aspects of each grievance and reach a decision on the next step. Where the committee does not reach a decision the BSOG CEO shall be responsible to determine the next steps which amongst others may involve additional experts/personnel being added to the BSOG Grievance Committee for a further review or may involve the BSOG CEO determining the decision to be implemented. BSOG will make all reasonable efforts to address the complaint upon acknowledgement of the grievance, progress chasing with the responsible person/department if actions are overdue and escalating any major problems to senior management. **All grievances will be acknowledged within 7 days and responded to no later than 30 days.** Once a grievance is logged, the related E&S event(s) that caused the grievance will be tracked to ensure proper closed-out of the grievance and prevent similar grievances.

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

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

Black Sea Oil & Gas main office

Bucharest

Calea Floreasca nr. 175, etaj 10

Sector 1, 014459

Bucharest, Romania

Phone: +40 21 231 32 56

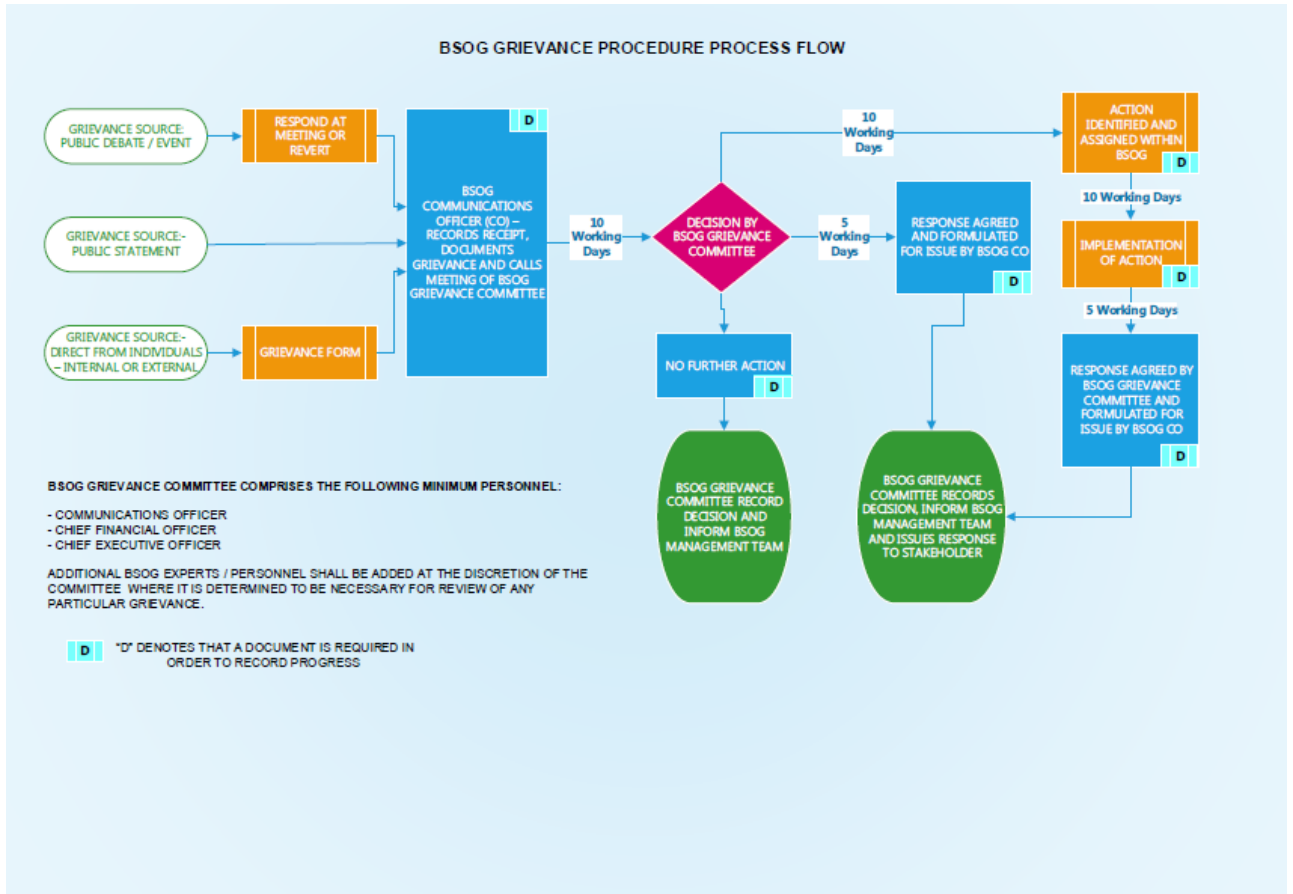
Contact person: Ana-Maria Pericleanu

Web site: <http://www.blackseaog.com/en/home/>. Email: [grievance@blackseaog.com](mailto:grievance@blackseaog.com)

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

To date, ***BSOG has not received any complaints related to the development of the project.*** This is a clear indication that the engagement actions that have been performed were effective and that all parties were properly and timely informed and consulted

Figure 6 Overview of Grievance Mechanism



## 8 MONITORING AND EVALUATION

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

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

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

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

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

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

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

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

A clear record of all these indicators will be kept at BSOG PIU office. Where possible the indicators shall be differentiated by gender and type of stakeholder, according to the categories defined in the Stakeholder Analysis chapter. Gender based data collection will be considered for the green marked indicators from the above list.

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

## 9 REPORTING

### 9.1 Internal Reporting

A review of stakeholder engagement will be presented on a regular basis within the BSOG project team, including:

- Annual CSR report;
- Monthly EHSQ project progress reports;
- Annual EHSQ report (including ISO 14000 provisions).

### 9.2 External Reporting

External reporting will include timely updates to relevant stakeholders regarding Project advancement. The main responsibilities for reporting are attributed to the Communication and CSR Manager. The following activities shall be undertaken as part of the external reporting process:

- Public disclosure of the ESIA;
- Public disclosure of the SEP;
- Environmental reporting to national and local authorities including:
  - Annual and quarterly reports on project development for the National Agency for Mineral Resources;
  - Annual report on number of offshore operation hours for ACROPO.
- Annual E&S report for IFIs;
- Mass media reports including:
  - The final investment decision;
  - Public announcements regarding the beginning of the construction, the implementation of certain activities, restrictions and the ceasing of certain activities;
  - Press releases;
  - Social media updates;
  - Informational movie that documents the project onshore and offshore construction steps.

## 10 ROLES AND RESPONSIBILITIES

The main departments within BSOG responsible for implementing this Stakeholder Engagement Plan are Regulatory & PGA and Communication & CSR, as detailed below. They are supported by the local community liaison officer. Some of these roles and responsibilities might change over time to reflect the changing needs of the stakeholder engagement process.

### Communication and CSR Manager responsibilities:

- **Overall SEP implementation:** monitoring and reporting;
- **Website:** Provide access to relevant information about the project;
- **Public consultations:** organize public consultations with the local community in order to provide information and consult interested parties regarding the project;
- **Focus group meetings:** organize focus groups in order to understand the community needs and identify the needs of vulnerable groups;
- **Mass media coverage/ Press releases/ Information disclosure:** offer relevant information to the mass media and third parties;
- **Grievance mechanism:**
  - Grievances received or identified, including filling out case details (General Information, Reported Party and Incident or claim Description/consequences sections) in the Grievance Analysis Report form (format included in Attachment 2) in readiness for the BSOG Grievance Committee meeting;
  - Maintain central log of all grievances ensuring it is kept up to date with current status;
  - Act as member of the BSOG Grievance Committee;
  - Prepare minutes of BSOG Grievance Committee Meetings, formally recording all decisions made by completing the Analysis, Analysis Results and Decision sections in the Grievance Analysis Report form for the case;
  - Prepare responses to grievance raisers and agree content with other members of the BSOG Grievance Committee;
  - Issue all responses to grievance raisers and ensure BSOG Management Team are informed.

### Regulatory and PGA manager responsibilities:

- **Public debates:** organize public debates related to the permitting processes and project compliance;
- **Meetings with local authorities and official correspondence:** organize meetings and correspondence in order to offer information about the project, request feedback, identify concerns and obtain permits;
- **Meetings with national authorities and official correspondence:** organize meetings and correspondence in order to offer information about the project, request feedback, identify concerns and obtain permits;

Further details on responsibilities and specific tasks associated with the above-indicated roles as well as the lines of responsibility within the overall project organization are provided in the Environmental and Social Management Plan (ESMP). The ESMP defines the overall environmental and social management planning for the project of which this SEP is being part of.





## APPENDIX B

## BSOG CONTACT LIST

Overall SEP implementation Grievance Mechanism Mass media coverage Public Consultations	Ana-Maria Pericleanu  Communications & CSR Manager  Black Sea Oil & Gas SRL  175 Calea Floreasca St. 10th floor District 1, Bucharest, 014459, RO  T: +40 212 313 256   F: +40 212 313 312   M: +40 724 254 909  Ana-Maria.Pericleanu@blackseaog.com  www.blackseaog.com
IFIs Contractors	Serge Guibert – CFO  Email: Serge.Guibert@blackseaog.com
Regulatory / Permitting aspects Public debates	Oana Ijdelea  Email: Oana.Ijdelea@blackseaog.com

## Appendix C. Engagement actions performed in 2017 – extract from Stakeholder Engagement Report

This part of the report will present the actions performed by BSOG team in 2017 based on the engagement actions as defined in the Stakeholder Engagement Plan approved in 2016. The below table reflects the main outcomes of the engagement process for 2017.

Stakeholder	Engagement method	SEP provisions	Actions performed in 2017
All	Website	Provide information related to: <ul style="list-style-type: none"> <li>- project structure and components</li> <li>- company structure and policies</li> <li>- project's achievements</li> <li>- permitting procedures</li> <li>- timing for project development and implementation</li> <li>- contact details and grievance mechanism</li> <li>- ESIA documentation (scoping report, ESIA report)</li> <li>- environmental and social action plan (ESAP)</li> </ul>	<p>The BSOG website is available to all stakeholders, both in Romanian language and English.</p> <p>The website provides general and specific information about the project development such as: information on SEA / EIA processes, public announcements, invitations to public debates, decisions of environmental authorities, environmental reports for project components, etc.</p> <p>Beside its website, BSOG is also using social media (Linkedin) for disseminating information about its activity.</p> <p>Based on the official statistics, the total number of visitors on the BSOG website was at about 18,456 users. Out of these, about 32% have been from Romania. Most of the users are accessing the news section of the website.</p> <p>The website does not include a grievance template (currently under preparation) but the company receives about 5 emails per month that are requesting information or provides suggestions for the company.</p> <p>Beside the official webpage that is available for public at large, BSOG has also developed an internal page that can be accessed only by the shareholders and employees of BSOG. On this dedicated webpage there are information available about all the activities of BSOG.</p>
	Public consultations	Provide information about the project's impacts and mitigation measures	Information about the public consultations have been provided via BSOG website throughout the entire year and through posting of announcements on the information board of the local authority and on site, as the case may be, based on the steps of the permitting process. The website includes announcements about the public debates and the decisions issued by the national /local environmental protection agencies.

Stakeholder	Engagement method	SEP provisions	Actions performed in 2017
			<p>During 2017, BSOG together with the representatives of national and local authorities have organised/participated at the following public debates:</p> <ul style="list-style-type: none"> <li>- 1 public debate for consulting on the preparation of the urban planning document for the GTP</li> <li>- 1 public debate for consulting on the strategic environmental assessment process for the GTP</li> <li>- 1 public debate for consulting on the environmental impact assessment process for the GTP</li> <li>- 1 meeting for the obtaining of the consent of the National Committee of the Coastal Area for the urban planning document for the GTP</li> </ul> <p>The main outcomes of the public debates are presented in the text below this table. Annex 1 to current SER includes the full Minutes of the meetings from the public debates together with a short photo report.</p>
Local authorities of Constanta County	Meetings	Provide information related to the project and the ESIA process, decisions related to project stages, etc.	<p>Several meetings have been held with different local/regional authorities in Constanta and Tulcea Counties. Among these, the most important stakeholders engaged during 2017 were:</p> <ul style="list-style-type: none"> <li>- local authority of Corbu commune</li> <li>- Environmental Protection Agency of Constanta</li> <li>- Danube Delta Biosphere Reserve Administration.</li> </ul>
	Official correspondence		
National Authorities	Meetings	Provide information related to the project, decisions related to project stages, etc.	<p>Beside the official meetings with representatives of Ministries, the BSOG management team had high level meetings with the Romanian Government, the President of the Senate and representatives of the Chamber of Deputies to discuss about BSOG's activity in the Black Sea region.</p> <p><a href="https://www.linkedin.com/company/10198071/">https://www.linkedin.com/company/10198071/</a></p> <ul style="list-style-type: none"> <li>1- Grindeanu meeting of 19 April</li> <li>2- Ciolacu meeting of 14 November</li> <li>3- Tariceanu meeting of 15 November</li> </ul>
	Official correspondence		



Stakeholder	Engagement method	SEP provisions	Actions performed in 2017
			<p>4- Mihalcescu meeting of 15 November</p> <p>For the purpose of preparing the ESIA report, the following supplementary meetings have been held:</p> <ul style="list-style-type: none"> <li>- National Agency for Fishing and Aquaculture (ANPA)</li> <li>- Romanian Naval Authority (ANR)</li> </ul> <p>Official correspondence was initiated with different stakeholders. A stakeholder engagement registry is kept by BSOG where all the official correspondence is registered.</p> <p>Representatives of BSOG have also participated at different working group meetings organised by national authorities for development or improvement of sectoral legislation or specific procedures for oil and gas. BSOG reviewed and provided technical input to several sectoral policies that are currently under preparation.</p>
<p>Representatives (and potentially individual members) of the affected local communities / Professional groups (fishermen/local businesses)</p>	<p>Focus group meetings</p>	<p>Presenting the project, its objectives, time life, impacts and benefits for local community</p> <p>Understanding the concerns, needs and expectations of specific groups and any vulnerable stakeholders</p>	<p>During the preparation of the ESIA scoping report, BSOG has been in contact with the representatives of local community directly impacted by the project. There were three missions conducted for data collection at the level of local community. During these missions, direct meetings with members of local community have been held and socio-economic data have been collected. The scope of these data collection missions were to understand the socio-economic context of the project development and to capture the concerns and expectations of local community.</p>
<p>Mass media</p>	<p>Press releases</p>	<p>Provide information about:</p> <ul style="list-style-type: none"> <li>- the project development</li> <li>- period of time of the public consultations sessions</li> <li>- results of the permitting procedure steps</li> <li>- decisions about permits</li> </ul>	<p>The project development and the environmental permitting process was reflected in the mass media both at local and national level. BSOG has published 12 public announcements in 2017, either on permitting process or decision on permits issued.</p> <p>Beside these, BSOG activity has also been reflected in 12 mass media articles either at national level or international one.</p> <p>A mass media report is attached to this SER (Annex 3).</p>

Stakeholder	Engagement method	SEP provisions	Actions performed in 2017
			<p>BSOG is constantly monitoring the way they company activity /name is reflected in social media. According to the mass media report for the period October – December 2017, the name BSOG appeared 45 times in social media. (the Social Media Analysis Report is available upon request)</p>

BSOG has also been actively engaging with the local community where the onshore components of MGD Project will be located. Thus, a year around corporate social development programme was initiated and financially supported by BSOG. The following CSR activities have been performed with the support of BSOG:

- Centenary commemoration of WW1 - laying wreaths of flowers
- Centenary commemoration of WW1 - lunch for relatives of WW1 veterans
- Centenary commemoration of WW1 - trip to the Marasesti mausoleum for the young people of Corbu and Vadu
- Centenary commemoration of WW1 - trip to the Marasesti mausoleum for the young people of Corbu and Vadu
- Support for student of AAPG for a field trip to Bulgaria
- School start in Vadu - provision of books, pen and chocolate for 41 children enrolled in the 2017-2018 school year
- Social case of Mrs Jalba Niculina whose house collapsed, BSOG contributed with construction materials to build one room
- Sponsorship of charity concert initiated by ViitorPlus (national environmental and social entrepreneurship NGO) on October 22nd, Music & Forests partner package
- National Day celebrations for young people of Corbu and Vadu
- National Day celebration at Vadu School - lunch for 56 children following the festivity
- Christmas festivities at Vadu school (gifts for 56 children).

## Main outcomes of the public debates and meetings


Three public debates and one technical meeting have been organised during 2017. This section presents the main outcomes of these public debates and analyses the way people's opinions and suggestions have been considered during the disclosure process of different environmental permits or other documents. The Minutes of the meetings from all Public Debates are available in Annex 1.

***The first public debate was organised on the 2<sup>nd</sup> of May 2017.*** Its purpose was to disclose and consult the representatives of local community of Corbu commune about the Environmental Report for the Urban Zoning Plan - Construction of the GTP. A total number of 15 persons participated at this public debate. During the meeting, there was only one question raised by the representatives of local community. The question was about the measures that BSOG will have to undertake for gas dispersion in case of malfunctions or disruptions during the technological process of GTP. The representatives of the consulting company that prepared the environmental report explained that the control system at the level of the GTP will include a dispersion stack ensuring that the dispersion of the methane will be done without harming the public health and safety.

***The second public debate was organised on the 3<sup>rd</sup> of May 2017.*** Its purpose was to inform and consult public at large on drafting and revision of Urban Plans and Territorial Landscape in accordance with the provisions of Order 2701 of 2010. The total number of participants for this meeting was of 5 persons, except the BSOG team. There were no questions or remarks regarding the documentation for the Urban Zoning Plan for the GTP were received by BSOG during the period of time allocated for questions or comments.

***The third public debate was organised on the 27<sup>th</sup> of December 2017.*** Its purpose was to inform and consult the interested persons on the main outcomes of the environmental assessment conducted in relation with the construction of the GTP. The questions raised by the participants were related to the construction timeframe, technical aspects related to GTP such as aspects related to gases that should/would be burned (there will be no such gases burned at the GTP), aspects related to different compounds that are used for gas treatment, etc. Also, there was one question related to the labour force needed for operating the GTP.

***The meeting of the National Committee of the Coastal Area organized on the 6<sup>th</sup> of June 2016.*** Its purpose was to inform the members of the committee on the preparation and of the urban zoning plan for the GTP and obtain the Committee's agreement for the proposed investment. The meeting was organised by the National Committee of the Coastal Area. This committee includes 40 members.

<p><b>CSR POLICY</b> BSOG-CO-POL-001-D01</p>	
<p>BSOG's CSR policy is rooted in the Company's core values of safety, perseverance, pioneering, team work and accountability and aims to meet the expectations of the Company's stakeholders that BSOG runs its business guided by international standards and best industry practices.</p> <p><u>Employees &amp; people</u></p> <p>BSOG values diversity and seeks to provide all staff with the opportunity for employment, career and personal development on the basis of ability, qualifications and suitability for the work as well as their potential to be developed at the job, while working towards our business objectives.</p> <p>We seek to guarantee that all employees are treated fairly and with dignity and consideration for their goals and aspirations.</p> <p><u>Health &amp; Safety</u></p> <p>We are committed to conducting our operations safely and responsibly, which means supporting local communities and protecting the environment, as well as looking after the health and safety of our employees and contractors hired by BSOG.</p> <p>Our goal is to maintain a zero-accident record and we are continually looking for ways to improve our Health and Safety Management System.</p> <p><u>Community</u></p> <p>We seek to make positive contributions to the local economy by improving and maintaining the wellbeing of the community local to our operations. To this end, we work to establish long-term relationships with the local community, understand its needs and assist the community help itself.</p> <p>Our CSR activities focus on education, community development and environmental protection and are conducted in partnership with local people, NGOs, local authorities and other stakeholders. BSOG is committed to making a positive, sustainable impact in these areas.</p> <p><u>Corporate Governance</u></p> <p>BSOG is committed to ensuring that its daily operations are conducted in all respects according to rigorous ethical, professional and legal standards.</p> <p>To this end, BSOG has put in place a system of procedures that enhances the transparency of its business through the strict compliance with the applicable laws and regulations and has zero tolerance to bribery and corruption.</p> <p><u>Environment</u></p> <p>BSOG recognizes that minimising environmental impact and the prevention of environmental incidents are essential to the operation of our business. We continuously improve our performance by setting and reviewing environmental objectives and targets and monitoring our progress.</p> <p>Our environmental responsibilities are addressed throughout the value chain and we are constantly investing in ways to reduce our carbon footprint and waste as well as to enhance our energy and water efficiency.</p>	
<p><b>Mark Beacom</b> Chief Executive Officer Black Sea Oil &amp; Gas</p>	<p>Signed:</p> <p>Date: 27.02.2019</p>

APPENDIX E  
2018

Photo report from CSR activities implemented in

CSR Christmas celebration Vadu school



CSR National Day at Vadu school





CSR tree planting





CSR trip to Alba Iulia



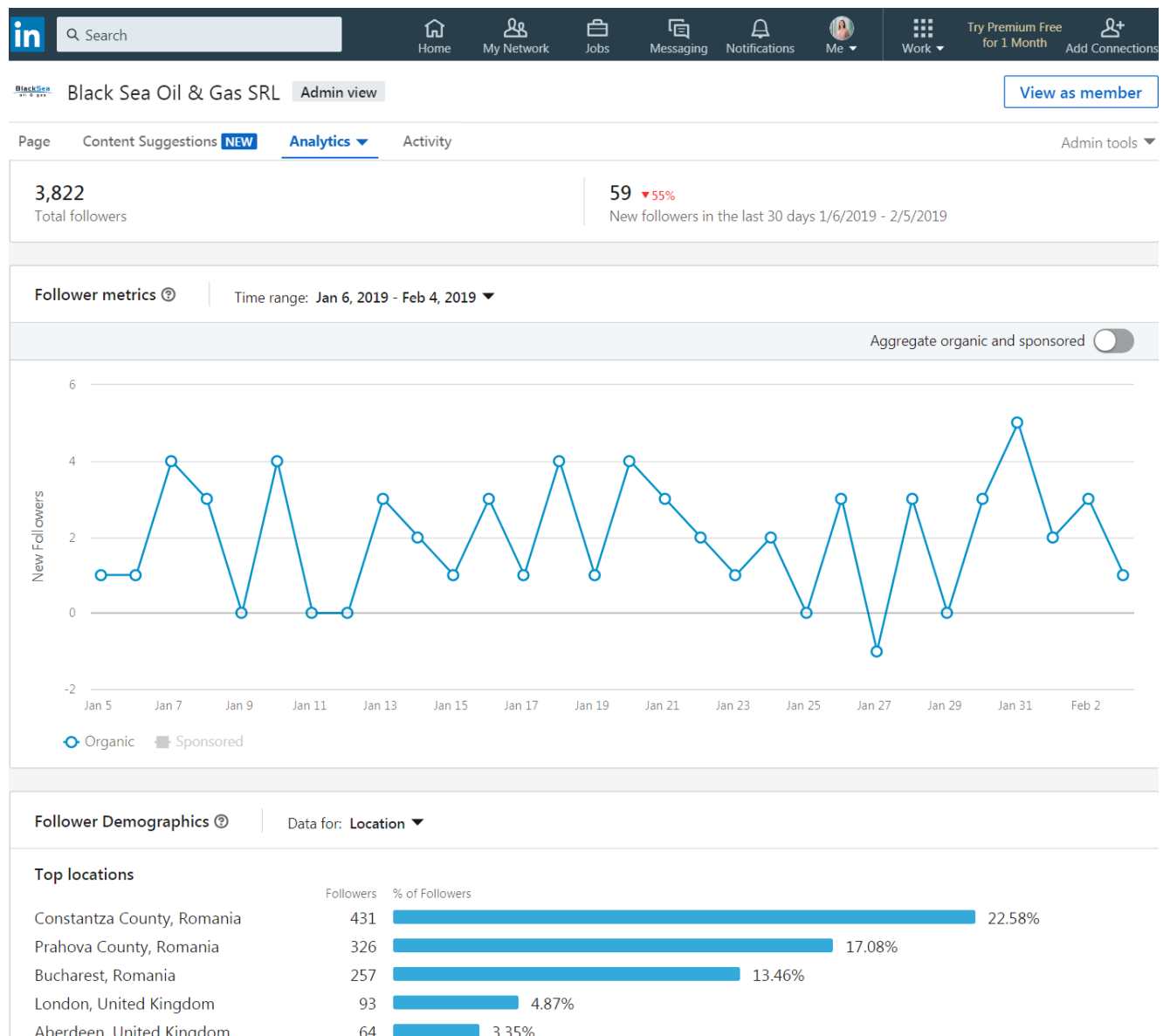
ZIUA INTERNAȚIONALĂ A  
**VOLUNTARILOR**  
ALBA IULIA, 2018



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# BSOG LinkedIn account, followers' dynamics and location at 06.02.2019



## BSOG Youtube account, videos portfolio and viewership status at 06.02.2019

**BlackSea oil & gas**

**BSOG**  
10 subscribers

HOME VIDEOS PLAYLISTS CHANNELS DISCUSSION ABOUT

Uploads PLAY ALL

Video Title	Views	Time	Age
MGD Project presentation movie - full details	209	7:19	3 months ago
Proiectul MGD - film de prezentare in detaliu	171	7:19	3 months ago
Proiectul MGD - film prezentare 3D	342	3:40	3 months ago
MGD project - 3D presentation movie	340	3:40	3 months ago
BSOG exploration drilling campaign, Black Sea, 2018	1.3K	2:35	6 months ago
BSOG campania de foraj de explorare, Marea Neagra...	526	2:35	6 months ago

## BSOG website, sessions and users' location in the last 90 days at 06.02.2019

https://www.blackseaog.com/wp-admin/

Apps Gaoxing Documenta

My Sites Black Sea Oil & Gas 3 New Autooptimize

**Dashboard**

Home My Sites User searches Admin search Posts Media Pages Comments 3 History Team Members Image gallery Press Releases Angajari Contact Advanced CF7 DB Appearance Plugins Users Tools

### Dashboard

Google Analytics Dashboard

Last 90 Days Location

Countries	Sessions
Romania	2,143
United States	1,580
United Kingdom	912
Bosnia & Herzegovina	374
India	274
France	210
Canada	120
Italy	110
Germany	87
Netherlands	71

report generated by GADWP

# MGD Progress update in the Romanian media, 23.11.2019

← → ↻ <https://economie.hotnews.ro/stiri-energie-22829119-black-sea-oil-gas-acordat-firmei-gsp-offshore-controlata-gabriel-comanescu-contractul-antrepriza-general-a-pentru>

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Caută în știri Go

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- Bănci
- Finanțe
- Bani europeni
- Companii
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- EuROfonduri
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- Energie
- Media & Publicitate
- 20 de ani de internet .RO
- Startup Cafe
- Asigurari
- Consumator
- Cariere
- Imobiliar
- Gadget

MedLife

Science

Sonda lunară chineză a trimis o imagine panoramică de pe fața nevăzută a Lunii



Sectiunea IT este sustinuta de

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## Black Sea Oil & Gas a acordat firmei GSP Offshore, controlată de Gabriel Comănescu, contractul de antrepriză generală pentru gazele din Marea Neagră

de CP HotNews.ro  
Vineri, 23 noiembrie 2018, 13:00 Economie | Energie

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Black Sea Oil & Gas a acordat contractul de antrepriză generală pentru proiectul din Marea Neagră către GSP Offshore, firmă controlată de omul de afaceri din Constanța, Gabriel Comănescu. Potrivit companiei petroliere, construirea întregii infrastructuri a proiectului se va realiza în aproximativ doi ani. Circa 70% din costurile aferente activităților contractate, care reprezintă majoritatea costurilor totale ale proiectului în valoare de 400 milioane dolari, vor reprezenta aport în România, mai precizează Black Sea Oil & Gas.



Mark Beacom și Gabriel Comanescu  
Foto: BSOG

„Black Sea Oil & Gas SRL împreună cu partenerii săi de concesiune, Petro Ventures Resources SRL și Gas Plus International B.V. („Gas Plus”), anunță că au acordat firmei GSP Offshore SRL („GSP”) contractul de antrepriză generală pentru toate lucrările offshore și onshore constând în serviciile de proiectare, achiziție, construcție, instalare și punere în funcțiune („EPCIC”) precum și Contractul de foraj pentru sondele de dezvoltare, în vederea realizării Proiectului Dezvoltare Gaze Naturale Mida („Proiectul MGD”) localizat în platforma continentală a Mării Negre aparținând României”, se arată într-un comunicat al Black Sea Oil & Gas.

Execuția contractului EPCIC, care va fi realizată doar în cazul luării Deciziei Finale de Investiție în proiectul MGD, acoperă achiziția, construirea, instalarea și punerea în funcțiune a ansamblului submarin de producție aferent zăcămintului Doina, construcția, instalarea și punerea în funcțiune a unei noi platforme de producție automate, amplasată pe zăcămintul Ana, care va fi construită în șantierul GSP din Constanța, sistemul de conducte submarine ce va lega platforma de producție de tărâm, conducta de pe uscat și noua stație de tratare a gazelor care va fi construită în satul Vadu. De asemenea, un alt contract a fost încheiat pentru forajul celor cinci sonde de producție (o sondă submarină pe zăcămintul Doina și patru sonde de producție pe zăcămintul Ana), pentru care GSP va mobiliza platforma de foraj de tip jack-up GSP Uranus.

„Proiectul de pionierat MGD ar putea acoperi 10% din necesarul de gaze naturale al României”, a declarat Mark Beacom, Directorul General Executiv al BSOG.

„Abilitatea noastră de a lua o decizie finală de a investi, odată ce am parcurs toate etapele rămase din proiect, este condiționată de aprobarea partenerilor și acționarilor, aprobare care la rândul ei depinde de impactul pe care noua Lege Offshore, în special noile prevederi fiscale cuprinse în lege, îl va avea asupra deciziei menționate de a trece la realizarea investițiilor în proiectul respectiv”, a mai spus Beacom.

Recent, Black Sea Oil & Gas a semnat cu ENGIE un acord de vânzare pe 10 ani a gazelor naturale provenite din Marea Neagră. De asemenea, a încheiat cu Transgaz și un contract pe 15 ani de transport al gazelor naturale din Marea Neagră în sistemul național de transport.

Black Sea Oil & Gas SRL, deținută de Carlyle International Energy Partners și Banca Europeană pentru Reconstrucție și Dezvoltare, este o companie independentă de petrol și gaze cu sediul în România care desfășoară operațiuni



# MGD progress update in the international media, 20.11.2018


← → ↻ <https://www.upstreamonline.com/live/1636560/bsog-inks-midia-gas-deal-with-engie>

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**BSOG inks Midia gas deal with Engie**

Romanian independent to supply 500 million cubic meter per year of gas over 10 years

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**Anamaria Deduleasa**  
20 Nov 2018 08:29 GMT Updated 20 Nov 2018 08:39 GMT  
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Romanian independent Black Sea Oil & Gas has signed a gas sales agreement with French utility Engie for natural gas supply from the Midia gas development project off Romania.

Under the deal, signed in partnership with Petro Ventures Resources and Gas Plus International, Engie will purchase gas from the Black Sea project for 10 years.

The agreement, which is subject to final investment decision, covers 500 million cubic metres of gas per year from Ana and Doina gas reservoirs.

The gas will be delivered at Vadu entry point into the National Natural Gas Transmission System from Romania.

The Midia gas development project consists of five production wells, one subsea well at the Doina field and four platform wells at Ana field.



Under the plan for the project, a subsea gas production system over the Doina well will be connected through an 18 kilometers pipeline with a

# Feedback form on BSOG intranet for employees

← → ↻ <https://forms.office.com/Pages/ResponsePage.aspx?id=Uw86ugw5c0mESTwUQW-Kv7uW-KMCmZxAvUNrUF1YJUFUMUw0RUNRNzVYQ1FZTDI3VjRRNVlQS0JLQj4u>

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## Give us your feedback

Please use this form to share your suggestions on improving the way the company is operated.

Hi, Ana-Maria, when you submit this form, the owner will be able to see your name and email address.

\* Required

1. Please enter your function below: \*

2. Please select the activity/department you wish to comment on \*

3. Please enter your comments or suggestions in the textbox below \*

4. What outcome do you expect? \*

# Employee engagement in CSR activities and internal announcements

Reply Reply All Forward IM



Thu 22/11/2018 11:49

Ana-Maria Pericleanu

CSR action this Saturday & intranet updates

To ALL BSOG; CALIN.BENU@ITADVISER.RO

Dear all,

This Saturday BSOG is organizing a **CSR action of planting young oaks** to celebrate with the community 100 years of Great Romania. There will be 100 young trees planted on Corbu church property (30) and Vadu school garden (70) and all the equipment for the planting will be provided by the community. Arrangements made so far: trees bought and transported to the locations, the land and holes already prepared. BSOG will join the community children and their parents for the easy part of the planting. Should the weather be mild, we envisage to **arrive in Corbu at 10:00 in the morning and end the day at 1-2:00pm**. If too cold or windy, we will finish earlier and leave the community to plant the rest of the trees on a sunnier day.

If you wish to join this initiative, please let Daniela Stroe know by tomorrow, 14:00hrs, so that she can organize proper transportation and meal. Confirmed attendees for far are: Mark Beacom, Daniela Stroe and Cristian Olteanu.

On a different topic, if curious on the main provisions of the Offshore Law or read the full document (in Romanian and English translation), check this [post](#) on our intranet.

Thanks.

PS: I will not be able to come to Corbu this time (on holidays from November 24<sup>th</sup> to December 2<sup>nd</sup>).

**Ana-Maria Pericleanu**

Communication Coordinator

**Black Sea Oil & Gas SRL**

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## APPENDIX F

## National Committee of the Coastal Area – members

1. Water Basin Committee Dobrogea - Litoral
2. Ministry of Environment and Sustainable Development
3. Ministry of Construction and Tourism Transport
4. Ministry of Economy and Commerce
5. Ministry of Culture
6. Ministry of Health
7. Ministry of Agriculture, Forests and Rural Development
8. Ministry of National Defense
9. Ministry of Administration and Interior
10. Ministry of Education and Research
11. Prefecture of Constanta County
12. Prefecture of Tulcea County
13. County Council Constanta
14. Tulcea County Council
15. Environmental Protection Agency Constanta
16. Tulcea Environmental Protection Agency
17. National Institute for Marine Research and Development "Grigore Antipa"
18. National Administration of Romanian Waters - Dobrogea Seaside Water Directorate - DADL
19. The Romanian Academy
20. Administration of the Danube Delta Biosphere Reserve-Tulcea
21. City Hall of Constanta
22. Tulcea City Hall
23. City Hall of Mangalia
24. Town Hall of Navodari
25. Eforie City Hall
26. City Hall of Costinesti
27. City Hall Agigea
28. City Hall 23 August
29. City Hall of Tuzla
30. City Hall of Sulina
31. City Hall of Sf. Gheorghe
32. Town Hall of Techirghiol
33. City Hall of Jurilovca
34. City Hall of Murighiol
35. Town Hall of Limanu
36. Nongovernmental Organization Oceanic Club
37. Nongovernmental Organization Mare Nostrum
38. Nongovernmental Organization Liga Navala
39. Nongovernmental Organization – Prietenii Deltei
40. Nongovernmental Organization – Romanian Ornithological Society