



# **Stakeholder Engagement Plan**

**TurkStream Gas Pipeline – Offshore  
Section: Turkish Sector**

**December 2018**



## Abbreviations

Abbreviation	Description
CLO	Community Liaison Officer
CIP	Community Investment Programme
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment
ESMP	Environmental and Social Management Plan
ESMoP	Environmental and Social Monitoring Programme
ESMS	Environmental and Social Management System
GIIP	Good International Industry Practice
MoEU	Ministry of Environment and Urbanisation
NGO	Non-Governmental Organisation
REC	Review and Evaluation Commission on an EIA
SCD	Stakeholder and Consultation Database
SEP	Stakeholder Engagement Plan

## Glossary

Terms	Description
Comment Form	A paper form through which stakeholders can submit written comments, views and opinions. Comment forms are distributed at public consultation meetings.
Consultation	The process of sharing information, ideas and concerns in a two-way dialogue between project proponents and stakeholders, allowing stakeholders to express their views and for these to be considered in the decisions about project planning and implementation.
Disclosure	The process of publishing and making available information in various ways (such as on the internet, in paper form or in press announcements).
Engagement	General term for activity including both disclosure and consultation.
Environmental and Social Management System	A system to manage the environmental and social risks and impacts of a project's activities.
Grievance	Formal notified complaint by people who feel they have been adversely affected by project-related activities.
Grievance Procedure	Process of recording and addressing grievances so that they can be tracked through to a resolution.
Stakeholder	Any individual or group potentially affected by a project, or which has an interest in, or influence over, a project.

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# 1 Introduction

## 1.1 Overview

This document is the Stakeholder Engagement Plan (SEP) for the TurkStream Gas Pipeline – Offshore Section in the Turkish Sector (“the Project”). The SEP is designed to ensure that the Project’s plans for engagement with stakeholders during all phases of development of the Project are communicated and understood by all those concerned.

The SEP explains the Project engagement programme with stakeholders over the life of the Project. For the purposes of this programme, a stakeholder is defined *as “any individual or group who is affected by a project or may have an interest in, or influence over it”*.

The SEP focuses on engagement with external stakeholders. In addition to the stakeholders discussed in this document, there are also a number of ‘internal’ stakeholders, including Project staff, shareholders and contractors. Although there is on-going engagement with these stakeholders, these processes are not covered in this SEP.

The SEP is a ‘living’ document and is being developed progressively, and updates issued, as the Project moves through the various phases of planning and implementation. This document is intended to provide an overview of stakeholder engagement activities undertaken since the start of construction activities in 2018, and planned engagement activities for the remainder of the Construction & Pre-commissioning Phase of the Project in 2019 (information on engagement activities carried out prior to the start of the Construction and Pre-Commissioning Phase of the Project (2015-2017) can be found in the 2017 version of the SEP).

The SEP is organised as follows:

- Section 1 provides background information about the TurkStream Gas Pipeline - Offshore Section, the environmental and social impact assessment processes, the Project proponent (South Stream Transport B.V.), and outlines the objectives of stakeholder engagement;
- Section 2 outlines the national and international requirements for stakeholder engagement;
- Section 3 provides an overview of the local context, and describes how stakeholders are identified and the methods and tools used to support engagement;
- Section 4 summarises stakeholder engagement undertaken to date;
- Section 5 provides the programme for ongoing and future engagement;
- Section 6 describes roles, responsibilities and resources for stakeholder engagement;
- Section 7 explains the ways in which stakeholders can contact the Project, including the grievance mechanism for the Project;
- Section 8 describes the monitoring and reporting of stakeholder engagement activities.

## 1.2 Background

### 1.2.1 TurkStream Gas Pipeline – Offshore Section

The Offshore Section of TurkStream Gas Pipeline is the offshore component of the TurkStream Gas Pipeline that will transport natural gas from Russia to Turkey and the countries of South-Eastern Europe.

It is made up of two 32-inch (813 mm) diameter pipelines extending approximately 930 km across the Black Sea from the Russian coast near Anapa to the Turkish coast near Kiyikoy (Figure 1-1). When complete, the Pipeline will transport up to 31.5 billion cubic metres (bcm) of natural gas per year from Russia, half of which will be used in the Turkish market and the other half to be delivered to the Turkish-European border.

**Figure 1-1 Route of the TurkStream Gas Pipeline – Offshore Section**



The Turkish Sector of the TurkStream Gas Pipeline – Offshore Sector (herein the Project) extends approximately 700 km from close to the Turkish and Russian Exclusive Economic Zones border to a coastal location approximately 2 km north of the town of Kiyikoy. The majority of the Project lies in the Turkish EEZ and Territorial waters of the Black Sea, and approximately 2 km are onshore.

The landfall section of the Project is located within the Municipality of Kıyıköy, in Vize District of Kırklareli Province. The nearest residential area is the community of Kiyikoy, approximately 2 km south of the landfall location. The shore crossing (where the Project transitions from sea to land) is at Selves Beach.

From the shore crossing, the Project extends approximately 2km inland, where it connects to the receiving terminal. The offshore section and the receiving terminal are designed and constructed by South Stream Transport B.V.

The onshore segments will bring the gas from the receiving terminal further inland. Of the two onshore pipelines, BOTAS will develop the first line in Turkey, which will connect to the Turkish network at Lüleburgaz. The second onshore line, which will run towards the Turkish- European border, will be realized jointly by Gazprom and BOTAS.

The Project is being developed in phases, illustrated in below.

**Figure 1-2 Project Phases**

<b>Feasibility Phase (2007-2014)</b>	<ul style="list-style-type: none"> <li>• Assessment of Project options</li> <li>• Preliminary engineering design</li> </ul>
<b>Development Phase (2015-2017)</b>	<ul style="list-style-type: none"> <li>• Engineering design</li> <li>• EIA</li> </ul>
<b>Construction &amp; Pre-Commissioning Phase (2018-2019)</b>	<ul style="list-style-type: none"> <li>• Construction</li> <li>• Pre-Commissioning Tests</li> </ul>
<b>Operational Phase (2020-2069)</b>	<ul style="list-style-type: none"> <li>• Gas deliveries</li> </ul>
<b>Decommissioning Phase (2070)</b>	<ul style="list-style-type: none"> <li>• Closure of pipeline</li> </ul>

### **1.2.2 South Stream Transport B.V.**

South Stream Transport B.V. is a company founded in the Netherlands on 14 November 2012 to assume responsibility for the design, construction, operation and ownership of the offshore pipeline.

## **1.3 Impact Assessment**

The Project has undertaken an Environmental Impact Assessment (EIA) in accordance with Turkish national legislative requirements. The final EIA Report was published in September 2017 and was approved by the Ministry of Environment and Urbanisation at the end of September 2017. The Impact Assessment process illustrates the commitment to develop and operate the Project in an environmentally and socially responsible manner.

The EIA Report describes the main characteristics of the Project and the measures that will be implemented to avoid and minimise potential environmental and social impacts of the Project. Comment periods to enable interested stakeholders to provide feedback on the EIA process and report were undertaken in accordance with Turkish legislative requirements; namely after the publication of the EIA Application File in May 2015, the draft EIA Report in June 2017, and Final

EIA Report in September 2017. The Final EIA Report can be found online at: <http://turkstream.info>. Additional environmental and social assessments have also been performed in to support the development of the EIA and Environmental and Social Management Plans. These assessments include a Socio-Economic Impact Assessment conducted between January – June 2017, a Fisheries Impact Assessment conducted between August – November 2017, and a Traffic Impact Assessment conducted in December 2017. Some of these assessments have included a consultation component whereby stakeholders were able to identify potential impacts related to the Project and / or comment of the findings of the impact assessment and related mitigation measures.

Both an EIA to meet national requirements and an Environmental and Social Impact Assessment in accordance with the standards and guidelines of financing organisations have also been undertaken in Russia, which is the starting point of the TurkStream Gas Pipeline – Offshore Section.

### **1.3.1 Environmental and Social Management and Monitoring**

The mitigation measures developed during the EIA and from additional assessments feed into the Project's Environmental and Social Management System (ESMS) which includes an Environmental and Social Management Plan (ESMP). The ESMP captures the mitigation and management measures and other environmental and social commitments made within the EIA Report and associated documentation.

The ESMP and its associated plans will address and manage the environmental and social impacts that are likely to occur as a result of the Project and will be in place throughout the construction and operation of the Project. The ESMP includes an overarching Environmental and Social Monitoring Programme for the Project which outlines monitoring requirements. Monitoring is required to demonstrate compliance with Turkish legal limits, applicable international standards and commitments contained within the EIA and ESMP. Monitoring provides verification of the overall design and effectiveness of the implemented mitigation and management measures.

## **1.4 Objectives of Stakeholder Engagement**

Stakeholder engagement (including consultation and the disclosure of information) is a key element of project planning, development and implementation. Effective stakeholder engagement assists good design, builds strong relationships with local communities and reduces the potential for delays through the early identification of issues to be addressed as a project progresses.

The Company is committed to a transparent and respectful dialogue with stakeholders throughout the life of the Project. The activities of engagement are guided by Good International Industry Practice (GIIP), as well as all applicable laws and regulations in the countries where the Project operates.

The aims of stakeholder engagement, outlined in this SEP, are to:

- promote the development of respectful and open relationships between stakeholders and the Project;
- identify Project stakeholders and understand their interests, concerns and influence in relation to Project activities;

- provide stakeholders with timely information about the Project and potential impacts, in ways that are appropriate to their interests and needs (taking into account factors such as location, language, culture, access to information) and also appropriate to the level of expected risk and adverse impact;
- give stakeholders the opportunity, through consultation and other feedback mechanisms, to express their opinions and concerns in relation to the Project, and for these to be reflected in the ESMP, and decisions about Project activities, where possible;
- support alignment with GIIP guidelines for stakeholder engagement; and
- record and resolve any grievances arising from Project-related activities.

## **1.5 Coordination with Onshore Section Developers**

The receiving terminal of the Project will tie-in with the TurkStream Gas Pipeline – Onshore Section. As such, the Project shares a number of stakeholders with the onshore pipeline project, particularly in the Kiyikoy area.

The Company works with the developer of the Onshore Section 1 project (BOTAS) and will work with the developer of the Onshore Section 2 project (a Gazprom-BOTAS joint venture) on a variety of issues related to the Project. If and when stakeholder concerns common to each project are identified the relevant companies shall work together to coordinate responses to these concerns where applicable.

## 2 Regulatory Framework

This section describes the regulatory framework that applies to the Project. The Project's approach to stakeholder engagement considers both regulatory requirements and principles of GIIP.

### 2.1 Turkish Regulatory Requirements

Stakeholder engagement undertaken as part of the EIA process has adhered to national requirements, as defined by the Turkish Environmental Law 2872 and related regulations and ordinances.

Public consultation is a mandatory part of the EIA process. The competent authority for the EIA process is the Ministry of Environment and Urbanisation (MoEU).

An overview of the EIA information disclosure and consultation process for the Project is shown in Table 2-1, whereas the regulatory framework is further detailed in Appendix A.

**Table 2-1 Engagement Requirements for Turkish EIA Process**

Activity	What happens	Purpose of engagement
EIA Application File	An EIA Application File is prepared in compliance with Annex III of the EIA Regulation, and submitted to the MoEU for acceptance. When it is accepted, a Review and Evaluation Commission (REC) comprising Turkish authorities and public bodies is created who are responsible for submitting their opinions on the proposed investment.	Inform government stakeholders of the proposed Project, including its location and scope and the potential impacts related to the proposed investment. The EIA process officially begins.
Public Participation Meeting	<p>A Public Participation Meeting (i.e. public hearing) is organized in affected communities by the project owner and the organization responsible for draft EIA Report.</p> <p>Public announcements concerning the EIA Public Participations Meeting are made 10 days prior to the meeting.</p> <p>Feedback received during the Public Participation meeting is taken into considered in the preparation of the Special Format for the EIA.</p>	Inform the affected and interested stakeholders about the planned project and receive their comments. Feedback is used to determine the structure and scope of the EIA.

Activity	What happens	Purpose of engagement
Scope and Special Format Determination	The scope of EIA Report is determined by the MoEU, in line with views and proposals of agencies/institutions who are members of the Commission, general public and other stakeholders. REC members are informed about the public hearing and provide their opinion and proposals concerning the project. The Special Format determined in line with the opinion of REC members is submitted by the MoEU to the project owner	Based on public hearings and REC members' opinions, the MoEU opinion, the project owner is provided with the scope of the EIA Report, addressing a list of topics that need to be covered.
Submission of draft EIA Report	<p>The project owner submits the draft EIA Report to the MoEU. If it is not accepted, the report needs to be revised and re-sent for acceptance.</p> <p>When the Draft EIA Report is accepted, it is published on the website of the Ministry of Environment and relevant Provincial Directorates and is open public comment for the remainder of the period of the EIA process.</p> <p>A REC meeting is held to evaluate the draft EIA Report. Then, the commented and reviewed report is returned back to the project owner to address these comments.</p>	<p>Provide stakeholders with a description of the Project and an assessment of its impacts. Stakeholders have an opportunity to review and comment.</p> <p>Feedback of the consultation is used by the Authorities to evaluate and comment on the draft EIA Report, which must be addressed by the project owner.</p>
Submission of Final EIA Report and EIA Decision	<p>The project owner submits the final EIA Report to the MoEU, which is then published on the website of the Ministry of Environment and relevant Provincial Directorates and is open public comment for the remainder of the period of 10 days.</p> <p>The MoEU will take a final decision about the report: "EIA Affirmative" or "EIA Negative"</p>	Stakeholders are provided with an opportunity to comment on the Final EIA Report, which is considered by the MoEU in the context of providing an "EIA Positive" or "EIA Negative" opinion.



## 2.2 Good International Industry Practice

The Project's approach to stakeholder engagement is guided by the principles of GIIP, which underscore the importance of stakeholder engagement in building constructive relationships that are essential for environmental and social issues to be managed successfully. In addition to the regulatory requirements for stakeholder engagement as part of the EIA process which are described above, the Project has undertaken supplementary engagement activities that are not directly related to the EIA or Turkish regulatory requirements. These voluntary engagement activities are described further in this SEP.

The main points of GIIP stakeholder engagement are summarised in Figure 2-1 S1.

**Figure 2-1 Summary of International Guidelines on Stakeholder Engagement**

<b>Consultation</b>	<ul style="list-style-type: none"><li>• Consult stakeholders about issues that may affect them, take their views taken into account in the EIA process, and respond to questions and concerns in general</li><li>• Tailor so that it meets stakeholders' needs and interests, including vulnerable groups</li></ul>
<b>Disclosure</b>	<ul style="list-style-type: none"><li>• Disclose and disseminate, in a timely way and in understandable language, relevant, understandable information about environmental and social issues. Extent and type of disclosure should be commensurate with project risks and impacts</li></ul>
<b>Grievance Resolution</b>	<ul style="list-style-type: none"><li>• Put in place a transparent and fair mechanism, at no cost to stakeholder, to record and resolve community grievances</li></ul>
<b>Project Management</b>	<ul style="list-style-type: none"><li>• Establish an Environmental and Social Management System to manage environmental and social issues</li><li>• Develop a Stakeholder Engagement Plan</li></ul>

## **3 Stakeholder Analysis**

For stakeholder engagement to be effective, it is necessary to determine who the stakeholders are, to understand their needs and expectations for engagement, and their priorities and objectives in relation to the Project. This information is then used to tailor engagement to each type of stakeholder.

Section 3.1 provides an overview of the area and communities in the vicinity of the Project. Section 3.2 explains how stakeholders, including vulnerable groups, are identified and lists the stakeholder groups identified to date. Section 3.3 describes how this analysis is used to develop tools and materials to engage stakeholders in ways appropriate to their needs and wishes.

### **3.1 Local Context**

#### **3.1.1 Overview**

The Project is located in Kiyikoy Municipality, Vize District, which is located in the Province of Kırklareli (Figure 3-1). Kiyikoy is a coastal town located approximately 155 km northwest of Istanbul. Fishing is the main livelihood activity in Kiyikoy, whilst forestry activities such as lumbering and animal husbandry are also important income-generating activities. The Kiyikoy region experiences a high intake of visiting tourists during summer months, between 5,000 – 10,000 visitors during a weekend. As such, services catering to tourism including accommodation and restaurants are also a significant economic engine in the town.

Within Kiyikoy Municipality, the landfall location of the Project is located around 2 km north of Kiyikoy town. The population of Kiyikoy is approximately 2,000. The town is comprised of Cumhuriyet and Kale neighbourhoods which lie within the town walls and Güven neighbourhood which lies outside of the town walls.

Bahcekoy village (population approximately 350) and Gungormez village (population approximately 1300), both within Saray District, are located approximately 13 km and 20 km away to the southeast of the landfall location. However, these villages are located along Project construction traffic transportation routes. Both of these villages are primarily involved in traditional livelihood activities such as lumbering and animal husbandry.

Other construction traffic routes going through Vize District may be used subject to the needs of the construction activities and after evaluation.

In addition, large scale pipeline construction work requires considerable support from onshore support facilities, known as marshalling yards, for the delivery, storage and load out of pipe, plant and equipment. A marshalling yard in the port of Samsun, Turkey is being used by the Project.

### Figure 3-1 Map of Project Location in Kiyikoy

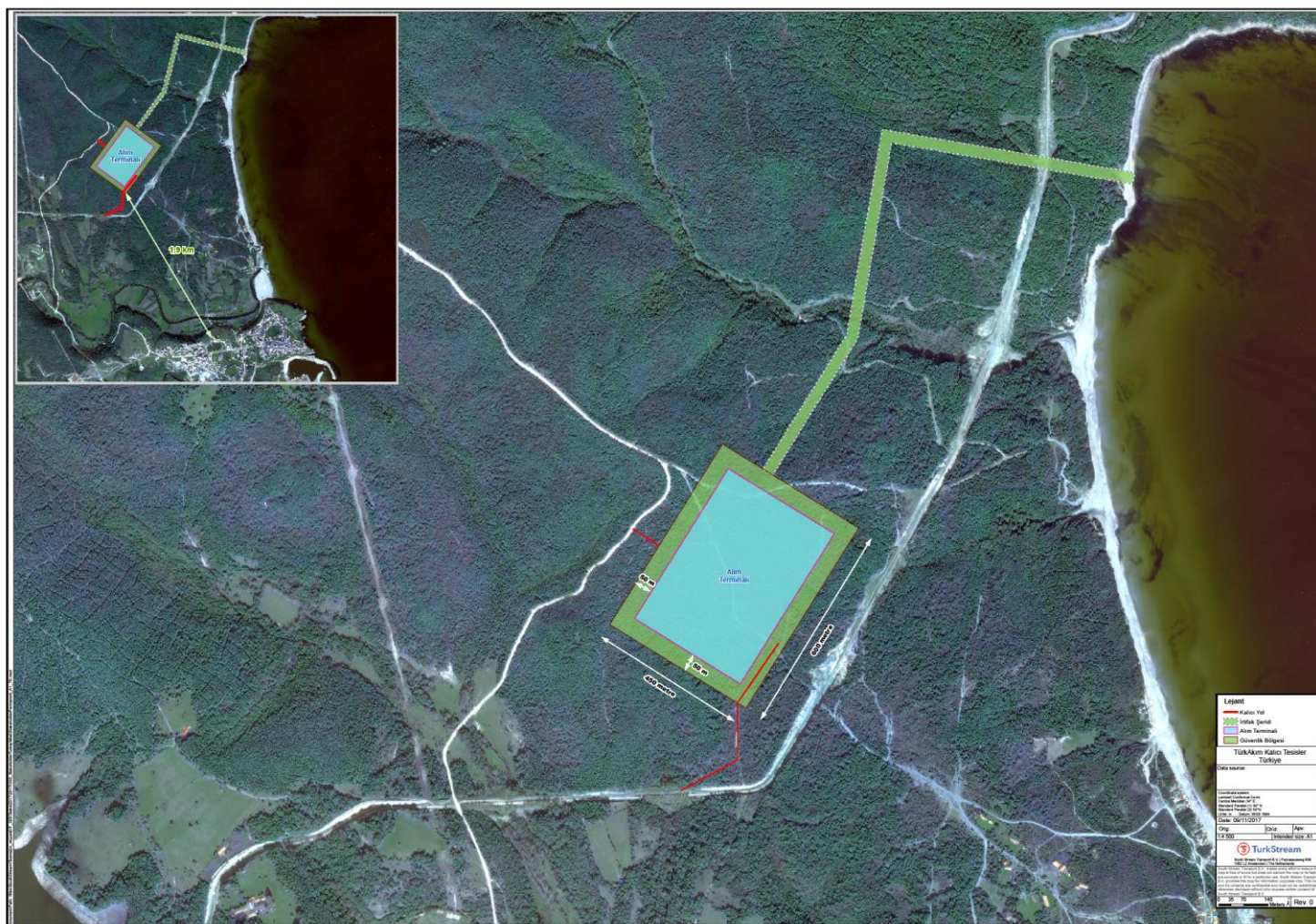
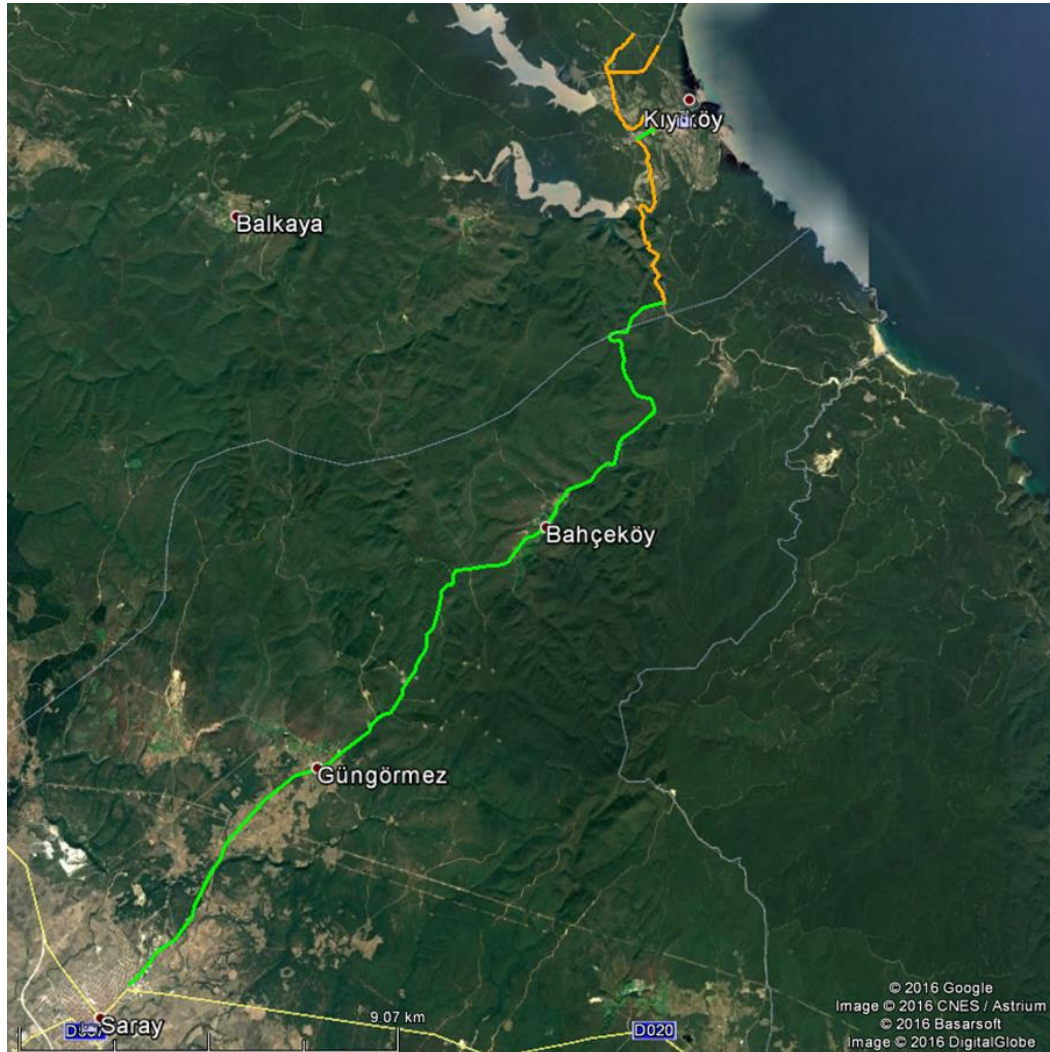




Figure 3-2 Map of Project Access Route



### 3.1.2 Local Communities

Local Communities, which are defined as populations which have the greatest potential to be impacted (positively or negatively) by the Project are a priority for both stakeholder engagement and the assessment of potential socio-economic, health, and other impacts.

For the purposes of the SEP, these communities are referred to as 'Local Communities', which are defined as communities that are the closest communities to the Project Area.

Kiyikoy town is considered to be a Local Community on the basis of its proximity to the landfall location and the potential for community receptors to experience environmental and social (including livelihood) impacts during the construction and operational phases of the Project.

Bahcekoy, Gungormez and Saray are considered to be Traffic-Impacted Communities given the potential for impacts stemming from road traffic to the landfall location using the access route through these communities. Whilst other communities are located along Project transportation routes, construction traffic will be using main highways that bypass other settlements, thus minimising the potential for impacts. However, should alternative transportation routes be used by construction traffic, subject to the needs of the construction activities and after evaluation, other Traffic-Impacted Communities may be identified.

Table 3-1 Lsummarises the communities in proximity to the Project in Turkey.

**Table 3-1 Local Communities within the Project's Area of Influence**

Local Community	Estimated Population	Approximate Distance from Landfall Location
<b><i>Vize District</i></b>		
Kiyikoy town	1977	2 km
<b><i>Saray District</i></b>		
Bahcekoy village	356	12 km
Gungormez village	1,316	19 km
Saray city	24,960	28 km

Within the local community of Kiyikoy, a number of specific areas of interest are also identified, including:

- Selves Beach, where the Project comes ashore;
- The Kiyikoy fishing community, based in Kiyikoy fishing port located south of the town, and who fish within the nearshore area where the Project comes ashore. The fishing community in Kiyikoy is represented by the Kiyikoy Fishing Cooperative;

- Tourism services in Kiyikoy, such as camping, restaurants and accommodation providers, and who are reliant on visiting tourists for income, and some of which overlook the area of the landfall location. A large proportion of the tourism services in Kiyikoy are affiliated to the Kiyikoy and Vize Tourism Association;
- The Kiyikoy forestry community, who engage in logging in the forests surrounding Kiyikoy and whose activities are primarily based in and around the landfall location. The Kiyikoy forestry community is represented by the Kiyikoy Agricultural Development (Forestry) Cooperative;
- Individuals involved in animal husbandry and beekeeping who are located close to the landfall location, as well along Project construction traffic access routes to the south of the town; and
- Four households in Kiyikoy who are located along the main access road to the landfall location and who may specifically experience impacts in relation to Project construction traffic.

### **3.1.3 Other Communities**

The Project also interacts with other communities in Turkey which have not been designated as Local Communities for the purposes of the stakeholder engagement process. Most notably, the cities of Vize and Kırklareli are not considered to be Local Communities, although the relevant authorities are consulted as needed.

The communities of Aksicim, Balkaya, Hamidiye, Kislacik, Kizilagac and Komurkoy are not considered to be a Local Communities due to their distance from Project activities – varying between 7 km and 18 km away from the receiving terminal construction site. The port at Samsun is used as a marshalling yards. However, the area is currently developed and operating as an industrial port. No new land development is anticipated and Project activities will be consistent with existing port activities. As such, the city of Samsun is not considered to be a Local Community.

## **3.2 Stakeholder Identification and Mapping**

As part of the stakeholder identification process, it is important to include individuals and groups who may find it more difficult to participate in engagement and those who may be differentially or disproportionately affected by the Project because of their marginalised or vulnerable status.

It is also important to understand how each stakeholder may be affected, or perceive they may be affected, so that engagement can be tailored to inform them and understand their views and concerns in an appropriate manner.

The appropriate type of engagement is determined by a number of factors, including the likely impact of the project on the stakeholder (often related to location) their influence over the project, as well as stakeholders' preferences and abilities to access information and participate in consultation.

Stakeholders for the Project have been identified in several ways, these include:

- Drawing on the local knowledge of in-country environmental and social consultants;
- Feedback from consultations with stakeholders held to date;

- Desktop research; and
- Observations made during field visits to local communities in the Project area.

The process of engaging stakeholders helps to identify further stakeholders as the Project develops. A list of stakeholders can be found in Appendix B.

It is helpful to group stakeholders based on common interests and characteristics. As such, the Project uses a number of 'stakeholder categories' to help structure activities for stakeholders of the Project. These stakeholder categories are described in Table 3-2 , including a summary of the expressed or anticipated interest of these groups with respect to the Project (e.g. potential impacts, benefits, concerns) and how these groups have been engaged to date.



**Table 3-2 Stakeholder Categories and Identification**

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
<b>Land Owners</b>		
<p>The Project required some temporary and permanent acquisition of land, which required agreements with applicable landowners.</p> <p>The majority of Project land take lies within State Forestry land or Treasury Land (for the shore-crossing). Some additional permanent acquisition of private land was required to widen roads near Kiyikoy to make them suitable for construction traffic.</p> <p>Additionally, some landowners in the vicinity of the Project may be affected by Project activities, including changes to viewscales or environmental conditions.</p>	<p>Ministry of Forestry and Water Affairs</p> <p>ISKI (landowner along some parcels of Project access roads in Kiyikoy)</p> <p>Private landowners along some parcels of Project access roads in Kiyikoy.</p>	<p>The Company has engaged with the Ministry of Forestry and Water Affairs and other state agencies who own the majority of the land affected by the Project.</p> <p>In accordance with the Intergovernmental Agreement (IGA) for the implementation of the Project, BOTAS are nominated as Land Rights Entity for the Project. As such, a Land Acquisition Protocol has been signed between the Company and BOTAS, whereby BOTAS manages land purchase and/or use agreements with the applicable landowners in accordance with Turkish regulatory requirements on behalf of the Project.</p> <p>Affected private landowners have been engaged by BOTAS with regard to acquiring parcels of land to widen the access roads.</p>

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
<b>Land Users</b>		
<p>The Project required some temporary and permanent acquisition of land within the forest and on the beach, and as such may affect access to these areas.</p>	<p>Forest lumber workers, animal husbandry owners, beekeepers, hunters, recreational visitors (campers, trekkers, tourists, etc.) who use the Selves Beach, the area around the landfall section and around the access roads.</p> <p>Kiyikoy Agricultural Development (Forestry Cooperative), Kirklareli Water Buffalo Union, Kiyikoy and Vize Tourism Association</p>	<p>Engagement with land users has involved public disclosure of Project documentation (including the draft EIA Report), group meetings with representative groups of affected stakeholders, and an Open Day event in Kiyikoy.</p>
<p>People who work on or use areas affected by Project land take may also be affected by access restrictions, which may consequentially have impacts on livelihood activities.</p>		<p>Specific engagement has also been undertaken with Kiyikoy Agricultural Development (Forestry) Cooperative, animal husbandry owners using the areas to the north and south of Kiyikoy town, individual beekeepers located around the Project area, and the Kiyikoy and Vize Tourism Association.</p>
<p>Additionally, Project activities may result in changes to the amenity of certain areas, such as changes to viewscales or environmental conditions, which may also impact livelihood activities (e.g. reduced recreational amenity may impact tourism).</p>		<p>These specific engagements have aimed to collect data on their activities, assess how potential impacts to their use and access of these areas would affect their livelihood activities or recreational amenity, and to agree and implement measures to avoid, minimise or compensate impacts.</p> <p>Specific engagement has also occurred with Kiyikoy Municipality and Kiyikoy muhtars, who can speak on behalf of potentially affected stakeholders as official community representatives.</p> <p>Although no organised group of beach users or recreational visitors have been identified, a combination of engagement with Kiyikoy Municipality, muhtars and Kiyikoy Tourism Association has been used as a proxy for this group.</p> <p>Meetings have also been held with the aforementioned groups to identify and implement Community Investment projects, particularly in relation to supporting tourism development in Kiyikoy.</p>

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
<b>Marine Area Users</b>		
<p>Fishermen and fisheries organisations (including fishing businesses) may be interested in and affected by potential Project impacts on fishing activities and livelihoods, including access to fishing areas and changes in fish health, migration and catch volumes. They could also be concerned about unplanned events (e.g. fuel spills) and how these events could affect fishing activities, as well as long-term impacts of the pipeline on local fish stocks and access to fishing areas.</p>	<p>Kiyikoy Fishing Cooperative, local Kiyikoy fishermen, fishing enterprises from other ports that fish within Kiyikoy fishing grounds.</p> <p>Fishermen and fishing cooperatives operating elsewhere along the Western Black Sea coast, such as the Igneada Fishing Cooperative.</p> <p>National Union of Fisheries Cooperatives (SUR-KOOP)</p>	<p>Regular and targeted engagement has been undertaken with Kiyikoy Fishing Cooperative and in informal and formal group meetings with fishermen in Kiyikoy since 2015. Engagement has included meetings to gather baseline information for the EIA report, socio-economic impact assessment and a bespoke Fishing Study carried out by international consultants, as well as to assess potential impacts on fishing. During nearshore construction activities in 2018, a specific engagement programme was established to define a framework and negotiate compensation for affected fishermen in Kiyikoy.</p> <p>Engagement meetings have also focused on sharing Project information with fishermen, and understanding and responding to concerns in relation to the Project.</p> <p>During marine surveys activities, regular notifications have been issued to the Kiyikoy Fishing Cooperative to circulate among fishermen informing them about the survey activities and any safety restrictions.</p> <p>Meetings have also been held with Kiyikoy Fishing Cooperative and fishermen to identify and develop Community Investment projects.</p>
<p>Offshore oil-and-gas exploration companies also have an interest in accessing and using the marine area.</p>	<p>Turkish Petroleum Corporation (TPAO)</p>	<p>Meetings and exchanges of information and data took place regarding the proposed pipeline route and coordination of activities between the Project and TPAO activities.</p>

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
<b>Traffic-affected Communities and Receptors</b>		
Local communities, individuals and businesses located on Project construction traffic access routes and roads may be experience impacts from noise and vibration, dust, reduced access and health and safety risks associated with the passage of heavy goods vehicles.	<p>Community of Bahcekoy (including residents, business, and community services such as health and education)</p> <p>Community of Gungormez (including residents, business, and community services such as health and education)</p> <p>Saray (including residents, business, and community services such as health and education)</p> <p>Animal husbandry owners located along Kiyikoy construction access roads</p> <p>4 Households located adjacent to Kiyikoy access road</p>	<p>Initial meetings have been held with Bahcekoy and Gungormez muhtars in Q2 and Q3 2017 to introduce the project, collect data about traffic in the community and discuss potential traffic mitigation measures.</p> <p>The findings of these meetings have been incorporated into a traffic assessment that will inform Construction Traffic Management Plans.</p> <p>Since the start of construction activities in 2018, periodic engagement has been conducted with representatives of Bahcekoy and Gungormez to inform them about the Project Grievance Procedure and to monitor the effectiveness of construction traffic mitigation measures. Engagements have also been conducted to identify potential Community Investment projects to undertake.</p> <p>Similarly, engagement activities have been performed with the owners of the 4 households located adjacent to the Kiyikoy access road to discuss measures to mitigate traffic-related impacts and monitor their effectiveness.</p> <p>Dedicated engagement activities have also occurred with animal husbandry owners located along construction access roads in Kiyikoy in 2018 in relation to traffic management and minimising disruption in access to grazing lands.</p>
<b>Local Government and Community Representatives</b>		
Local authorities have a general interest in the potential impacts and benefits for their respective communities.	<p>Kiyikoy Municipality</p> <p>Kiyikoy Municipal Council</p> <p>Kiyikoy Mayor</p>	<p>Kiyikoy Municipality have been regularly engaged throughout the course of the Project, to keep them informed about Project activities, discuss permitting procedures, as well to understand community concerns in relation to the Project. Engagement has also involved interviews as part of the socio-economic baseline data collection, and the identification and development of Community Investment projects.</p>

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
<p>Within Local Communities, there are also local representatives officials, opinion leaders, groups or bodies who are able to speak on behalf a wider cross-section of the community. They are, therefore, influential in both sharing information with community and represent their interests.</p> <p>These community representatives therefore have a general interest in the potential impacts and benefits of the Project on the people or groups who they represent.</p>	<p>Kiyikoy Muhtars (three muhtars of Cumhuriyet, Kale and Güven neighbourhood respectively).</p> <p>Bahcekoy Muhtar</p> <p>Gungormez Muhtar</p> <p>Management Board of Kiyikoy Fishing Cooperative</p> <p>Management Board of Kiyikoy and Vize Tourism Association</p> <p>Management Board of Kiyikoy Agricultural Development (Forestry) Cooperative</p> <p>Kiyikoy representatives of Kırklareli Water Buffalo Union</p> <p>Management Board of Roma Association</p>	<p>Regular engagement has occurred with muhtars, and the management board of the various representative cooperatives and associations in Kiyikoy to inform them about the Project and its progress, as well as to discuss measures to mitigate potential impacts and assess the effectiveness of measures.</p> <p>Dedicated engagements have also been conducted to identify and implement Community Investment projects.</p>
<b>Businesses and Business Associations</b>		
<p>Local businesses may benefit from procurement opportunities related to the provision of goods and services to the Project. Conversely, other businesses may be concerned about potential impacts on business revenues, particularly in relation to the tourism sector.</p>	<p>Construction-related businesses and related support services (e.g. catering, security, accommodation, environmental management).</p> <p>Kiyikoy and Vize Tourism Association</p> <p>Employment Agency ISKUR, Thrace Development Agency and Chamber of Commerce of Vize District.</p> <p>Port and related industry in Samsun</p>	<p>Engagement in relation to procurement has primarily been managed by Construction Contractors who are responsible for identifying local goods and services providers, where practical.</p> <p>Construction contractors have conducted engagements in the local community to explain their procurement procedure, and how local suppliers can apply for suitable opportunities.</p> <p>Targeted engagement has been undertaken with Kiyikoy and Vize Association to discuss potential impacts of the project in relation to tourism, and to identify and implement community investment projects that would benefit the tourism industry in Kiyikoy.</p> <p>Employment, development and representative trade associations have also been engaged as part of socio-economic data collection and to identify potential opportunities for community investment.</p>

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
<b>General Public (including residents of, and visitors to, the Local Communities)</b>		
Local Communities may be affected by impacts related to traffic, noise, and environmental changes, as well as changes to land use and access (including the beach and surrounding forest). They may also be able to benefit through employment and business opportunities, or interested in local improvements such as potential access to gas supply.	<p>Residents of Local Communities (Kiyikoy, Bahcekoy, Gungormez) and tourists / visitors to these Local Communities.</p> <p>Residents of surrounding settlements</p>	<p>The general public has been engaged through a variety of engagement activities, including the publication of Project documentation (including the draft EIA Report), the Kiyikoy Open Day event, and announcements via the Project website, and through the media.</p> <p>The Project has also organised public events and activities in the Local Communities, as part of the Community Investment Programme and Communications activities which serve as a forum for local residents to engage with Project personnel and ask questions.</p> <p>The Grievance Procedure has been announced in the Local Communities of Kiyikoy, Bahcekoy, Gungormez so that residents are aware of how they can reach the Company in case of comments and/or complaints.</p> <p>Materials relating to the Project have also been distributed in the Local Communities.</p>
<b>Community Service and Infrastructure/Utilities Organisations</b>		
Community service and infrastructure/utility providers are interested in how the Project might impact on community services and infrastructure development plans. This may include direct impacts (e.g. on road infrastructure or water mains) or indirect impacts (e.g. increased strain on local services due to use by Project workforce)	<p>Borusan wind-farm (power generation), ISKI (Istanbul Water and Sewerage Administration), Directorate of Roads and Highways, TREIAS (electricity connection), TREDAS (communication lines)</p> <p>Kiyikoy Gendarmerie</p> <p>Kiyikoy education facilities (pre-primary-secondary-high schools)</p> <p>Kiyikoy health facilities (Kiyikoy family health centre and Kiyikoy emergency unit), Saray hospital, Vize hospital</p>	<p>Direct engagement has occurred with Borusan (previously AKSA) wind farm and ISKI in terms of Project design and development due to interactions with their infrastructure and plans. Engagement has also occurred with TREIAS and TREDAS with regard to connections for the Receiving Terminal.</p> <p>Regular engagement has occurred with Kiyikoy Gendarmerie with regard to safety and security of site personnel, and provisions for security arrangements during construction and operations.</p> <p>Some engagement has occurred with Kiyikoy health facilities to understand their capacity in order to plan for construction workforce health arrangements.</p> <p>Other engagements with Kiyikoy health facilities and schools have occurred with regard to the identification and implementation of community investment projects.</p>

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
<b>National and Regional Government Authorities</b>		
National authorities have an interest in the national EIA and permitting procedures, particularly in terms of ensuring compliance with Turkish regulations. In addition to their regulatory role, government departments have specific interests in topic areas such as the environment, cultural heritage, transport and fisheries, etc.	Turkish national authorities (e.g. Ministry of Energy and Natural Resources, Ministry of Environment and Urbanization, Ministry of Culture and Tourism, Ministry of Food, Agriculture and Livestock, etc.).	National authorities have been informed and consulted as part of the EIA process, as well as specific permitting procedures. Engagement with various government departments responsible for specific topics of interest has been ongoing through the EIA and permitting processes.
Regional authorities and public officials have a general interest in the potential impacts and benefits for their respective communities.  Some regional institutions also have a role in permitting procedures.	Kirklareli Provincial Governorship and Tekirdag Provincial Governorship (and related institutions under their jurisdiction)  Vize District sub-governorship and Saray District sub-governorship (and related institutions under their jurisdiction)  Vize and Saray Municipality  Public Officials including: Kirklareli Governor, Tekirdag Governor, Vize Sub-Governor, Saray Sub-Governor, Saray Mayor, Vize Mayor  MPs from Kirklareli and Tekirdag Provinces.  Regional agencies such as the Kirklareli Provincial Directorate of Culture and Tourism, Istanbul Regional Forestry Directorate, Vize Provincial Directorate of Forestry, etc.	Regional institutions have been engaged throughout the course of the Project, as part of both the EIA process and permitting procedures, as well as data collection for environmental and social impact assessments and the Community Investment Programme.  Introductory and project updates meetings have been held with relevant regional officials, including Governor, sub-Governors, Mayors and MPs to inform them about the Project.



Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
<b>Non-Governmental Organisations</b>		
NGOs (including local, national and international NGOs, as well as other community based organisations) may be interested in a diverse set of issues, ranging from protection of the terrestrial environment and forests, and Black Sea ecology, to archaeological assets, to potential impacts on tourism and other industries. NGOs are often interested in reviewing and commenting on EIA documents, particularly in regard to the identification of environmental and social impacts and the ways that these impacts will be mitigated and managed.	Local and regional NGOs interested in environmental protection and ecosystems such as Northern Forestry Defence Initiative, Thrace Platform	NGOs have had the opportunity to review and comment on the EIA Application File and the draft and final EIA Report.
<b>Academic and Research Organisations</b>		
Academic and research organisations may be interested in data from the Project's numerous marine surveys, as well as the potential effects on the marine environment or ecology, marine cultural heritage and environmental protection.	University faculties across Turkey with a focus on engineering, marine sciences, physical and ecological environment, and cultural heritage.	Some research institutes and university departments have been engaged to support the preparation of the EIA Report and other studies.  Academic and research organisations have also had the opportunity to review and comment on the EIA Application File and the draft and final EIA Report.
<b>Media</b>		
Journalists and other representatives of the media are often interested in ensuring that clear and transparent information about the Project is communicated to the national population. Interested in general Project information including updates on the EIA process.	Turkish media at national, regional and local levels.	Engagement with the media has occurred through press releases, announcements, interviews and press conferences. Local media have also been engaged in response to local issues and current events, and on specific topics of interest to the Local Communities.

It should be noted that as the Local Communities that have been identified are relatively small, there is a degree of overlap between the different Stakeholder categories and groups that have been identified.

### **Vulnerable Groups**

Stakeholder identification and engagement also seeks to identify any potentially vulnerable or disadvantaged individuals and groups in local communities. Vulnerable groups are those who may be differently or disproportionately affected by the Project, or whose situation may mean that special care is needed to engage them in consultation and disclosure activities (e.g. in terms of language, literacy, technology, etc.).

The Project has identified a number of potentially vulnerable groups for the Project, including children/young, elderly, disabled and chronically ill people, low-income households, women, and the Roma minority group. Where relevant, differential impacts on these groups have been considered in the impact assessment (e.g. impacts related to community health and safety).

The Project has considered the needs of all potentially interested stakeholders, including those for whom special care in consultation may be needed, throughout the stakeholder engagement process. Efforts have been made to disclose information in a variety of ways so as to be accessible to all groups, regardless of socio-economic or other status. For example, by holding meetings at individual, group and community level; finding opportunities to share information on an ongoing and informal basis (in teahouses, markets and shops where women and other groups congregate) and identifying interlocutors who can share information; and adapting materials to suit the needs of the audience – through simple visuals and maps, non-technical brochures and leaflets, and more in-depth presentations. All documents have been provided in Turkish.

In terms of accessing these groups, the engagement activities undertaken in developing and implementing the Community Investment Programme have facilitated building relationships with members of certain groups, such as youth, women and Roma, whereby other information about the Project can be shared with them and their feedback is considered.

## **3.3 Disclosure and Engagement Methods and Materials**

The Project employs a range of methods and channels for disclosing information in order to tailor disclosure to the interests and needs of the various stakeholder groups, and also produces materials appropriate for specific stakeholders and types of engagement. The engagement process encourages meaningful participation by stakeholders.

The stakeholder engagement process includes two-way targeted engagement related to specific potential Project impacts, for example traffic, impacts to fishing, and impacts to animal husbandry activities. To date the Impact assessment studies have shown that—after the implementation of design controls, management and mitigation measures—the majority of the residual environmental and social impacts of the Project are assessed to be of low significance and temporary in duration; nevertheless, engagement activities continue throughout construction around specific topics of interest and known concerns of stakeholders, and to assess the effectiveness of measures.

### 3.3.1 Project Disclosure Methods and Materials

Information about the Project is disclosed in several ways: via the internet (publication of reports, website), in printed form (presentations, reports, leaflets); in person in face-to-face meetings and telephone conversations. Project documentation is published in Turkish (and English as appropriate) and made available in local communities and distributed during meetings. Translation and interpretation services are provided as needed. Disclosure of relevant project information, including project description; purpose, nature, and scale of the project; duration of proposed project activities; updates on construction activities; risks or potential impacts on Local Communities and relevant mitigation measures being applied; and stakeholder engagement and grievance mechanism processes helps Local Communities and other stakeholders understand the risks, impacts and opportunities of the Project.

Specific information materials covering announcements, notifications, or updates are also prepared as appropriate to aid the anticipated engagement activities. Project information and updates are also communicated via the Project website ([www.turkstream.info](http://www.turkstream.info)).

**Figure 3-3 Project Information Materials**



### 3.3.2 Project and Stakeholder Engagement Materials

Materials supporting stakeholder engagement include printed information in the form of leaflets and posters as well as documents that form the focus of disclosure and consultation activities, such as the EIA Report. Project documents and other information are also published online at [www.turkstream.info](http://www.turkstream.info). Other materials are developed to support consultation meetings, including presentations, posters and banners illustrating aspects of the Project, its potential impacts and

mitigation measures. The engagement materials produced are listed in Table 3-3, with copies of the materials developed to date available in Appendix H.

**Table 3-3 Engagement Materials Produced**

Type	Details
Documents disclosed as part of the EIA process	EIA Application File Draft EIA Report Final EIA Report
Additional documents disclosed	Stakeholder Engagement Plan Community Needs Assessment Non-Technical Summary Fishing Compensation Framework Document MRAG Fisheries Study
Additional documents to be disclosed	Stakeholder Engagement Plan (updates as applicable) Environmental and Social Overview Report
Supporting materials	Project brochures (distributed at meetings and in communities) <ul style="list-style-type: none"> <li>Corporate brochure</li> <li>Kiyikoy Community brochure</li> </ul> Project leaflets (distributed at meetings and in communities) <ul style="list-style-type: none"> <li>Feedback Process and Grievance Procedure leaflet</li> <li>Community Investment leaflet</li> <li>Factsheets on Environmental and Social topics</li> </ul> Project updates published on website and in print Maps, posters and banners displayed at meetings and in the Kiyikoy Information Centre Presentations used in meetings

### 3.3.3 Communication Channels

Feedback mechanisms are adapted to suit the needs and preferences of the many different stakeholders, as well as their location. They range from comment boxes, which are used in local communities to gather feedback in written form, to web-based mechanisms that can gather feedback from all over the world.

The different disclosure methods, materials and communication channels used to engage stakeholders are shown in Table 3-4.

**Table 3-4 Engagement Mechanisms**

Stakeholder Category	Disclosure Methods	Communication Channels
All stakeholders	Website  Newspaper announcements	Email, telephone, and post

Stakeholder Category	Disclosure Methods	Communication Channels
Residents of local communities	Newspaper announcements, hard copies of documents and materials distributed and made available in communities and Kiyikoy Information Centre.	Email, telephone, post and in person Group meetings and public events
Landowners	Relevant information sent directly to affected landowners by BOTAS	Engagement on land acquisition occurs primarily through BOTAS. However, affected landowners can also contact the Company through the following channels: <ul style="list-style-type: none"> <li>Email, telephone, post and in person</li> <li>Meetings with Project representatives if required</li> </ul>
Land users and marine area users	Hard copies of documents and materials distributed and made available in communities. Notifications and invitations to meet with South Stream Transport have also been addressed to specific stakeholders.	Email, telephone, post and in person Public events Individual and group meetings
Government authorities	Notifications, key documents and invitations to meet have been addressed to specific stakeholders.	Email, telephone, post and in person Meetings and correspondence
Inter-governmental organisations	Website Newspaper announcements	Email, telephone, and post
Non-governmental organisations (NGOs)	Website Newspaper announcement	Email, telephone, post, in person
Community Service and Infrastructure/Utilities Organisations	Notifications, key documents and invitations to meet with South Stream Transport have	Email, telephone, post and in person Meetings and correspondence

Stakeholder Category	Disclosure Methods	Communication Channels
	also been addressed to specific stakeholders.	
Business and business associations	Notifications, key documents and invitations to meet with South Stream Transport have also been addressed to specific stakeholders.	Email, telephone, post and in person Meetings and correspondence with South Stream Transport
Academic and scientific organisations	Notifications, key documents and invitations to meet with South Stream Transport have also been addressed to specific stakeholders.	Email, telephone, post and in person
Media	Press releases, media interviews and events regarding Project updates and disclosure periods.	Media contacts

## 4 Completed Stakeholder Engagement Activities in 2018

Stakeholder engagement in Turkey began in May 2015 with the publication of the EIA Application File. Since then, the Project has carried out a series of formal and informal engagements to gather feedback and information for the EIA Report, undertake additional environmental and social assessments, develop and implement environmental and social mitigation and management measures, and for the development of the Community Investment Programme. The primary engagement activities for 2018 are summarised below in Table 4-1, with a full list of meetings held in 2018 contained in Appendix E

A summary of engagement activities conducted between 2015 – 2017 is contained in Appendix C, with a detailed list of activities contained in Appendix D.

**Table 4-1 Summary of Completed Engagement Activities in 2018**

Event / Activity	Date	Engagement
Relocation of beekeepers	January 2018	Starting with data collection started in late 2017, in early 2018 hives that may be affected by construction were relocated to alternative areas in agreement with owners.
Completion of Community Needs Assessment and development of Community Investment programme for 2018	January – April 2018	A series of meetings were held with local authorities, community representatives and members of Local Communities to share the findings of the Community Needs Assessment and to agree on the projects to be implemented as part of the Community Investment Programme for 2018.  Meetings continued throughout 2018 with relevant stakeholders and beneficiaries to design and implement the agreed Community Investment projects.
Notifications and coordination of onshore construction activities	February – March 2018 and continuing throughout 2018	Meetings were held with Kiyikoy community representatives and relevant authorities to inform them about planned construction activities and to coordinate measures in relation to health, safety and security.  Coordination with relevant community representatives and authorities has continued throughout 2018 as different construction activities are planned.
Community disclosure of the Feedback Process and Grievance Procedure	March 2018	Whilst the Grievance Procedure had already been developed in 2017, a series of meetings were held with key stakeholders in the local community to inform them about the Grievance Procedure to coincide with the start of construction activities. This activity was supported by the distribution of the Feedback Process and Grievance Procedure leaflet.  Ongoing community liaison is undertaken by the Community Liaison officer on various aspects of the Project, including necessary engagement with individuals who submit grievances about the Project.



Event / Activity	Date	Engagement
Traffic management coordination with Traffic-Affected Communities	March 2018 - ongoing	Meetings with authorities in Saray and community representatives in Bahcekoy and Gungormez to receive feedback on construction traffic management, and to disclose and ensure accessibility of the Grievance Procedure.
Socio-economic monitoring meetings	Starting March 2018 and every Quarter	Meetings with local authorities, community representatives, livelihood groups (fisheries, animal husbandry, beekeeping, forestry) and other stakeholders potentially affected by Project activities (such as households, businesses and tourism service providers), to monitor potential Project impacts and assess the effectiveness of mitigation measures.
Development and implementation of Kiyikoy Animal Husbandry mitigations	Starting March – April, and continuing throughout 2018	<p>Starting in March, meetings were held with people involved in animal husbandry located close to the Project construction areas to identify, design and agree on measures to mitigate impacts on their livelihoods. The set of measures to be taken were finalised in agreement with animal owners in March and implementation started in April.</p> <p>For animal husbandry enterprises located elsewhere in Kiyikoy, further engagements were held throughout the year to related to measures to reduce impacts and disruption to animal husbandry routes and grazing areas and to the reduce the risk of any traffic incidents during construction, as far as practicable, through appropriate traffic management.</p>
Disclosure of employment and procurement procedure	April 2018	<p>Meetings held with Kiyikoy Municipality and community representatives led by Construction Contractors to share information about expected job and procurement opportunities, application and selection processes and methods for advertising positions within the local community.</p> <p>Relevant employment positions are have been advertised within Kiyikoy as they become available.</p>
Hosting and supporting events, activities and visits	Starting April 2018 and periodically throughout 2018	<p>Engagement has occurred with wider members through hosting or supporting events and activities in Kiyikoy, as well as arranging visits. In 2018, this has included:</p> <ul style="list-style-type: none"> <li>- Supporting 23 April Children's Day celebrations</li> <li>- Hosting a community football tournament in May-June</li> <li>- Arranging visits with community representatives and delegates of local, district and regional authorities to the construction site and to the Pioneering Spirit construction vessel</li> <li>- Supporting the opening of the Kiyikoy Cultural, Arts and Training Centre in October 2018</li> </ul>

Event / Activity	Date	Engagement
		<ul style="list-style-type: none"> <li>- Sponsoring and hosting a Children's Photography Exhibition in Kiyikoy in October, and in Istanbul in December.</li> <li>- Organising community representatives and delegates of local, district and regional authorities to attend the Offshore Construction Completion Ceremony in Istanbul in November.</li> </ul>
Fisheries compensation	April – July 2018	<p>Starting in April 2018, meetings were held with the Kiyikoy Fishing Cooperative and fishermen in Kiyikoy to disclose the findings of the MRAG Fishing Study and agree on a framework for compensating impacts to fisheries during nearshore construction activities.</p> <p>A series of group meetings were held with representatives of the Fishing Cooperative, large and small vessel owner, divers and crew members to agree on the principles and approach to compensation. Feedback from fishermen on the compensation process and strategy, which was incorporated in the process.</p> <p>The compensation mechanism and framework was finalised and made available to fishermen in July 2018, and compensation agreements were concluded with affected fishermen.</p> <p>In addition, meetings were held with the General Directorate of Fisheries in Ankara, and the Igneada Fishing Cooperative to inform them of the expected impacts during nearshore construction.</p>
Notifications and coordination of nearshore construction, including shore-crossing of the beach	June – December 2018	<p>Meetings were organised with Kiyikoy community representatives in June 2018, and with fishermen in August 2018 to share information about construction activities on the beach, including the schedule of activities and restrictions applied for health and safety purposes.</p> <p>Maritime notifications were issued to local fisheries via the relevant authorities. Updates on the progress of activities were shared with the Kiyikoy Fishing Cooperative, including discussions on the coordination of activities where necessary to minimise disruption to fishing.</p>
Opening of Kiyikoy Information Centre	December 2018	<p>The TurkStream Information Centre opened in Kiyikoy in December 2018 and members of the community were invited to attend the opening ceremony, visit the centre, and speak to Project representatives.</p> <p>The centre hosts materials with information about the Project, and Project representatives are available to answer queries and share information with visitors.</p>

Event / Activity	Date	Engagement
Authority Liaison and Permitting	Ongoing	Engagement with various government stakeholders at different levels to discuss permitting requirements and processes and to provide updates regarding Project development.

The following sections describes the engagement in more detail.

## **4.1 Engagements related to Construction Activities and Impact Management**

### **4.1.1 Start of Construction Notifications and Coordination**

A series of engagement activities were coordinated to coincide with the start of onshore and nearshore construction activities. Stakeholders were engaged directly, as appropriate, to inform them about the works, schedule, any restrictions that would be applied and any potential impacts that are foreseen, and measures that would be taken by the Project to mitigate impacts. These meetings were also used to coordinate important aspects of the construction process with regard to community health, safety and security measures.

Stakeholders engaged as part of this process included:

- Kiyikoy Municipality and other relevant authorities
- Kiyikoy muhtars;
- Kiyikoy Gendarme;
- Heads and representatives from Kiyikoy Fishing Cooperative, Forestry Cooperative, Animal husbandry unions, the Roma Association, and the Kiyikoy and Vize Tourism Association;
- Kiyikoy fisheries;
- Animal husbandry owners located close to the Project construction area and along access roads in Kiyikoy.

Further meetings were held with stakeholders prior to the start of nearshore and shore crossing construction activities on the beach in mid-2018, including group meetings with Kiyikoy Municipality and community representatives in June 2018 and fishermen in August 2018 (see Figure 4-1).

**Figure 4-1 Information meeting on Nearshore Construction Activities in Kiyikoy Fishermen's Teahouse**



With respect to construction activities on the beach and in the nearshore, notices were erected in the vicinity warning people about construction activities and safety restrictions, for the benefit of people that use the beach.

Engagements have continued with relevant stakeholders as required to update them on the progress of construction activities, as well as to coordinate activities where applicable.

#### **4.1.2 Disclosure of the Grievance Procedure and Compensation Management and Livelihood Restoration Framework**

The Project has developed a Grievance Procedure to ensure that complaints are addressed in a timely and consistent manner (see Section 7.1.2 for further information). Although stakeholders have been informed about the Grievance Procedure in person during meetings in 2017, and a non-technical leaflet explaining the Grievance Procedure has been distributed during the Kiyikoy Open Day and during meetings, refresher meetings were held early 2018 to coincide the start of landfall construction activities.

These meetings explained the Grievance Procedure in more detail and made people aware of how they can submit a grievance. Moreover, the meetings served as a means to make the Grievance Procedure more widely available within Kiyikoy, including the distribution of the Grievance Procedure leaflet in the town (see Section 3.3).

In addition, as compensation for Project impacts on livelihoods is a key and recurring issue, these meetings served the purpose of explaining the Project's Compensation Management and Livelihood Restoration Framework so that stakeholders became aware of how compensation / livelihood restoration claims are assessed and the type of information sought to validate any claims (see Section 7.1.3 for more details).

The following stakeholders were engaged as part of this process:

- Kiyikoy Municipality;
- Kiyikoy muhtars;

- Heads and representatives from Kiyikoy Fishing Cooperative, Forestry Cooperative, Animal husbandry unions, the Roma Association, and the Kiyikoy and Vize Tourism Association;
- Animal husbandry owners located close to the Project construction area and along access roads in Kiyikoy.

#### **4.1.3 Engagement on Employment and Procurement Opportunities**

Meetings were held with Kiyikoy Municipality and community representatives, led by construction contractor Petrofac, in April 2018 to provide further information on the number and type of vacancies and procurement opportunities that may be available, and to understand how and where employment vacancies and procurement opportunities needed to be advertised, in consultation with local stakeholders.

As suitable employment positions become available they are advertised via notices in the town, and community representatives are informed in order to share the information more widely.

Updates about employment and procurement on the Project is shared with stakeholders on an ongoing basis through regular community liaison.

#### **4.1.4 Engagement regarding Traffic Management**

Periodic engagement has been held with muhtars in Bahcekoy and Gungormez to inform them about the traffic management measures being taken by the Project, and to receive their feedback on the effectiveness of these measures. The Grievance Procedure leaflet has been distributed in the community via the muhtars, and notices have been made put in public places informing people of how to recognise Project vehicles and how they can make a complaint if they see or experience any issues related to construction vehicles.

In Kiyikoy, engagements with the Kiyikoy Municipality and community representatives took place in early 2018 to inform them about construction traffic levels and routes. Stakeholders were informed that heavy good vehicle construction traffic would not pass through the centre of the town. In addition, as part of these discussions, the Project agreed to upgrade a bypass road to Selves beach which would primarily be used by visitors in order to avoid interactions with construction traffic routes.

Additional stakeholder engagements in Kiyikoy occurred on a reactive basis; such as, households located along the access road to the landfall construction site and animal husbandry enterprises located close to Project transport routes, in response to issues raised and grievances reported about the impacts of construction traffic. Where practicable, additional mitigation measures were implemented to try to address such issues.

#### **4.1.5 Engagement with Kiyikoy Animal Husbandry Enterprises**

In early 2018 meetings were held with the northern Kiyikoy Animal Husbandry members located close to the Project Construction Area both individually and in groups to agree on Project mitigation measures to protect livestock and minimize impacts on livelihoods. A set of measures were agreed on, including erecting animal barrier fencing close to roads, providing fodder and



water to compensate loss of access to grazing lands and developing new wallowing holes for water buffalo.

Concurrently, individual and group meetings were held with animal husbandry owners located elsewhere in Kiyikoy to inform them about Project traffic management measures and the Grievance Mechanism. Monitoring of traffic impacts and review of incoming grievances later indicated that the Project impacts on animal husbandry activities located elsewhere were greater than expected. Further engagement therefore occurred during the latter half of 2018 to discuss measures to support animal crossings across access roads and negotiate settlement for inconvenience of animal husbandry activities.

**Figure 4-2 Meeting with Kiyikoy Animal Herders**



#### **4.1.6 Engagement with Kiyikoy Fisheries**

Beginning in April 2018, meetings were held with the Kiyikoy Fishing Cooperative and fishermen in Kiyikoy (both smaller vessels using inshore areas, and larger vessels that tend to operate offshore) to disclose the findings of the MRAG Fishing Study.

In May 2018, this was followed up with a series of engagements to develop a framework for fishing compensation based on the feedback and consensus of Kiyikoy fishermen. Initially a group meeting was held in the town in which over 100 fishermen participated. In this meeting, the principles of the fishing compensation process was presented and jointly discussed, culminating in an agreement on the next steps of the compensation process.

Following this initial open group meeting, a series of follow up meetings were held with self-identified groups of fishermen (large vessel owners, small vessel owners, divers, and vessel crew) in the wedding hall. During these meetings, information was again shared about the expected impacts of the Project. Discussions then focused on identifying a suitable mechanism for compensating any loss of catch incurred during the nearshore construction phase, including how

losses could be assessed, agreeing on eligibility criteria, and establishing a mechanism for compensating both fishing vessel owners and workers on the vessel.

Meetings were announced in advance and participation was open to any person in the community to attend. As a final step, based on the feedback received from fishermen, a Fishing Compensation Framework document was published in mid-July 2018 which presented the mechanism for compensation defined the eligibility criteria, and set out the next steps of the process in terms of how and when vessels could apply. Individual compensation agreements with vessels owners, and divers (totalling close to 200 separate agreements) were concluded by the end of July.

Throughout the process, important stakeholders such as the Kiyikoy Fishing Cooperative, Kiyikoy Municipality, Vize District Governorship, and General Directorate of Fisheries and Aquaculture were kept informed and consulted as appropriate. Table 4-2 below summarises the engagements held as part of the fishing compensation process.

**Table 4-2 Engagement with Fisheries as part of Fishing Compensation Process**

Stakeholder	Purpose	Date
Kiyikoy Fishing Cooperative Kiyikoy Fishing Community	Disclosure of MRAG Fishing Study to fisheries community via informal meetings and through teahouses	3-April
Kiyikoy Fishing Cooperative	Kick-off Meeting for the Compensation Process	29-May
Kiyikoy Fishing Community	Kick-off meeting at the fishermen's teahouse to explain compensation approach and process. In addition:  Explain expected Project impacts and planned measures  Receive feedback about the process and next steps  Aim to agree on a representative body to negotiate the fishing compensation protocol with	30-May
Separate Fishing Group meetings	Group meetings with: <ul style="list-style-type: none"><li>• Crew members</li><li>• Large trawl vessel owners (Class A&amp;B combined)</li><li>• Class C vessel owners</li><li>• Class D vessel owners</li><li>• Divers</li></ul> To explain expected Project impacts, present an overview fishing compensation approach and principles and to agree on next steps.	31-May
Separate Fishing Group meetings	2nd round of group meetings with: <ul style="list-style-type: none"><li>• Crew members</li><li>• Large trawl vessel owners (Class A&amp;B combined)</li><li>• Class C vessel owners</li><li>• Class D vessel owners</li><li>• Divers</li></ul> Related to developing the fishing compensation strategy	12-June

Stakeholder	Purpose	Date
General Directorate of Fisheries and Aquaculture, Ankara	Share information about the fishing assessment and compensation process being followed	20-June
Separate Fishing Group meetings	<p>Group meeting(s) with:</p> <ul style="list-style-type: none"> <li>• Large trawl vessel owners (Class A&amp;B combined)</li> <li>• Class C vessel owners</li> <li>• Class D vessel owners</li> <li>• Divers</li> </ul> <p>Present the initial fishing compensation offer and eligibility criteria.</p>	4-July
Kiyikoy Fishing Cooperative Kiyikoy Fishing Community	Disclosure of the Fishing Compensation Framework, with announcement period for eligible fishermen to sign up. Contracts prepared with eligible fishermen based on registration.	17-28-July
Kiyikoy Vessel Owners Kiyikoy Fishing Crew Members	Dialogue with vessel owners to determine crew members eligible for compensation. Announcement of draft crew list and open application process of one week for individuals to register their applications to be considered as crew members.	20-28 December

Further engagement occurred with vessel owners and the Kiyikoy Fishing Cooperative in late 2018 to update the list of crew members in Kiyikoy who would be eligible to receive a proportion of compensation on an equal basis in line with the agreed crew share payment scheme.

## 4.2 Socio-economic Monitoring Programme

Stakeholders continue to be engaged to provide input into aspects of the Project's Environmental and Social Management plans and procedures where necessary and as deemed appropriate. Engagement will also be done to monitor the environmental and social impacts of the Project, verify the effectiveness of measures, and to receive feedback from stakeholders on Project performance and areas for improvement.

The Project has an Environmental and Social Monitoring Programme (ESMoP) covering the construction period which is intended to verify the effectiveness of Project mitigation measures, and allow for the early identification of any unanticipated or greater than predicted socio-economic impacts whereby corrective measures need to be implemented.

As part of the socio-economic component of the ESMoP, meetings are held with stakeholders on a quarterly basis to receive community feedback on potential Projects impacts, and assess Project performance in terms of impact management and other issues. The engagement component of monitoring includes the following:



- Monitoring of potential impacts on community livelihoods (including fishing, animal husbandry, tourism, forestry, beekeeping);
- Monitoring of potential impacts on the local economy and businesses (specifically on tourism, and service providers that benefit from tourism).
- Monitoring of construction traffic impacts and traffic management;
- Monitoring of any other impacts related to construction activities (noise, dust, visual impacts, access issues, workforce conduct, and stress on local community infrastructure or services).
- Monitoring of stakeholder engagement activities, including where stakeholders are kept informed about Project activities, whether the Feedback Process and Grievance Procedure is accessible and effective.
- Monitoring feedback concerning the Community Investment Programme.

The socio-economic monitoring programme is led by independent experts from Cinar, including the engagement component which is conducted with the support of the Project CLO.

The following stakeholders have been engaged as part of the socio-economic monitoring programme to date:

- Kiyikoy Municipality;
- Muhtars in Kiyikoy, Gungormez and Bahcekoy;
- Kiyikoy Fishing Cooperative and Fisheries groups;
- Kiyikoy animal husbandry enterprises;
- Kiyikoy beekeepers;
- Kiyikoy Forestry Directorate and Kiyikoy Agricultural (Forestry) Cooperative;
- Kiyikoy Tourism Association;
- Local businesses and service providers, such as markets, accommodation and restaurants, cafes in Kiyikoy, Gungormez and Bahcekoy; and
- Households adjacent to access road in Kiyikoy.

In addition to the above, the Project liaises with relevant stakeholders, on an as needed basis, to inform them about specific monitoring results, such as air quality, noise and water quality.

### **4.3 Grievance Procedure**

Engagement is an important component of the Grievance Procedure. Once a Grievance is received, a number of steps are followed. This includes acknowledging the grievance to the complainant, investigating and assessing the complaint in conjunction with the complainant, and seeking to agree on appropriate measures to address the grievance with the complainant. As some grievances are more complex than others, there may be ongoing engagement with individual complainants over several months.

During the course of 2018, 56 grievances were received either directly by the CLO or by mail. The majority of grievances tended to relate to claimed impacts on livelihoods, impacts of construction

traffic, and impacts on land and property, whilst a small number concerned worker conduct. All grievances received came from Kiyikoy.

Of the 56 grievances received in 2018, 47 were closed by end of year, whilst 9 remained open as which were still within the 30 working day period of closing the grievance.

Grievances were considered closed either when complainants had signed resolution forms, or where all appropriate and reasonable measures were implemented by the Project.

## **4.4 Community Investment Programme**

The Company has developed a Community Investment Programme (CIP) to promote local development opportunities and building relationships with community stakeholders.

A Community Needs Assessment was undertaken in Q4 2017 which informed the development identification of projects to be implemented as part of the Community Investment Programme for the remainder of the Construction Phase.

Starting in January 2018, meetings were held with stakeholders engaged as part of the Community Needs Assessment process to inform them about the findings of the study, and to go through a process of prioritising and selecting projects to take forward for implementation at a sectoral and cross-community level. In Kiyikoy, this process was finalised in April 2018 when a set of investments were agreed upon between the Company and community representatives.

Concurrently, the Community Investment brochure was distributed widely in Local Communities and stakeholders were informed about:

- the process of identifying and selecting projects;
- the areas in which the Project will invest in; and
- the ways in which they could submit proposals or requests for consideration

Thereafter, an ongoing process of engagement has occurred with relevant stakeholders and beneficiaries to further develop and implement CIP projects. Some projects, particular those with related to skills development and trainings, have required exhaustive engagements between beneficiaries, community representatives, authorities and identified partner organisations to agree on the content of projects, roles and responsibilities, and to ensure an open and transparent process for identifying and selecting participants.

Where investment projects proved too difficult to implement, further consultation was held with relevant stakeholders in order to find alternative projects that the Project could invest in. The first set of CIP projects selected as part of the aforementioned process were implemented at the end of Q1 2018 in partnership with identified organisations.

A list of the projects planned or completed as part of the Community Investment Programme is summarised in Table 4-3 and illustrated in Figure 4-3. In addition to the CIP projects agreed with community stakeholders in early 2018, a number of incoming proposals for community investments were received from stakeholders during the year, which were evaluated internally according to the Project's CIP selection criteria and stakeholders were informed of the outcome, with some additional projects being taken forward for implementation.

**Table 4-3 Summary of Community Investment Programme For 2018**

<b>Investment Area</b>	<b>Project</b>	<b>Description</b>	<b>Current Status of Project</b>
Economic Development - Fishing	Donation of cold storage unit to Kiyikoy Fishing Cooperative	The cold storage unit will benefit fishermen economically as they will be able to stock more fish and potentially increase sales prices.	In development. To be completed by Q1 2019
	Refurbishment of fishermen shelters in Kiyikoy Port	Improving the existing shelters in the port which are in poor condition, for the benefit of fishermen and to make the port more attractive.	In development in conjunction with relevant authorities and Kiyikoy Fishing Cooperative.
Economic Development - Tourism	Improve safety and recreation on Selves and Port beach in Kiyikoy	Donate infrastructure and equipment to improve the health and safety facilities on the beaches, as well improve the conditions for tourism and leisure.	To be developed for Q2 2019.
	Enhancing Service Capacity in Tourism	Tourism Capacity Development training programme developed to improve quality of services in restaurants and accommodation.	Trainings starting in December 2018, and planned to continue into 2019. Almost 60 participants attending the trainings.
	Marketing/promotional support for Kiyikoy tourism industry	Development of Kiyikoy tourism website, tourism brochures and signage to promote the local tourism industry.	In development. To be completed by Q2 2019.
Economic Development – Animal Husbandry	Supporting development of Beekeeping in Kiyikoy	Technical assistance training programme developed to improve honey production techniques. The programme will additionally aim to support branding and marketing of local honey produce.	In development. Planned for Q2 2019
Economic Development – Women	Supporting local product development	Training programme developed for production of local handicrafts and jewellery as part of skills development and potential income generation. Training also covers	Trainings started in November 2018 and will continue in 2019. Almost 50 participants attending the trainings.

Investment Area	Project	Description	Current Status of Project
		hygiene, packaging, presenting, advertising and marketing of local food products.	
	Fishing net weaving programme for women	The project aims to create an additional income generating activity for women who can produce / repair fishing nets and sell them to fishermen.	In development. Planned for Q1 2019.
Supporting Community Services, Education and Health	Improving conditions in Kiyikoy Schools	Refurbishment of school facilities in Kiyikoy, including primary, secondary and high schools. Donation of classroom and educational equipment.	Donation of library books to Kiyikoy High School, and school uniforms donated to every student in Kiyikoy in 2018. Refurbishments and classroom donations planned for Q1 2019.
	Construction of a new Kiyikoy Health Clinic and Emergency Service	Contribution to the construction of a new health clinic and emergency service facility in Kiyikoy.	In development. Planned for Q1 2019.
Improvement of recreational/leisure facilities in Kiyikoy	Construction of changing rooms and administrative building near Kiyikoy football pitch	Install changing rooms and other facilities to improve the use of the area around Kiyikoy football pitch.	In development with Kiyikoy Municipality.
	Install roof for Kiyikoy football pitch	Install a covered roof over Kiyikoy football pitch to make it suitable for use during winter.	Completed in Q4 2018.
	Establish Arts, Culture and Training Centre in Kiyikoy	Internal refurbishment of the Cultural Centre to make it fit for purpose, and run the centre for the community's benefit for one-year.	Completed in Q4 2018. Running of the centre will continue until end of 2019.
Social Development,	Arts and crafts courses for children, youth and women	Running and supporting small-scale community courses in music, arts and crafts, and other practical courses in Kiyikoy to promote local skills development.	Guitar and clarinet trainings delivered to over 40 youth and adults. CV training courses delivered to youth. Photography masterclass workshop and practical training delivered to

Investment Area	Project	Description	Current Status of Project
Community Events and Activities			over 20 schoolchildren in for Kiyikoy. Further courses to be planned throughout 2019.
	Contributions to Kiyikoy Events (e.g. Kiyikoy Marine Day, Children's Day, Kiyikoy football tournament; event for Roma community).	Small-scale contributions to support the set-up and implementation of existing community events (e.g. Kiyikoy Marine Day, Children's Day), or support set-up of specific or new community events	Ongoing. Sponsored Children's Day performances in Kiyikoy, contribution's made to Kiyikoy high school marching band for Republic Day on 29 <sup>th</sup> October, organisation of local Kiyikoy Football Tournament for adult teams in April – May 2018. Further contributions to be identified in 2019.
Environmental Awareness Raising	Awareness raising on reducing waste and pollution in Kiyikoy	Development of awareness raising programme including outreach activities, materials development and local volunteer clear-up activities to increase community awareness of environmental pollution and everyday initiatives they can take to manage the problem.	Trainings started with youth in November 2018 and will continue with other groups in 2019. Local clean up initiatives planned for mid-2019.
Infrastructure - Support	Road improvement works in Kiyikoy	Contributions to improve main road and secondary roads in Kiyikoy, including associated infrastructure improvements, to benefit residents and Kiyikoy tourism potential.	Co-funding of secondary road improvement works in Kale and Cumhuriyet neighbourhoods of Kiyikoy. Plan to support improvement of the main road in 2019, subject to authorities initiating procedures.  Completed. EUR 100 K paid to Kiyikoy Municipality in November 2018 to complete works, with EUR 50 K contributed by Petrofac
	Kiyikoy Port bridge reconstruction	Reconstruct the bridge adjacent to Kiyikoy port, used to access the port beach.	In development with Kiyikoy Municipality.



**Figure 4-3 Training and Skills Development Delivered as part of the Community Investment Programme**



In addition to the projects listed above, construction contractors involved in the Project have also made contributions to Kiyikoy. Some of the contributions have included:

- Repair of broken garbage skips for Kiyikoy Municipality
- Improvement of the main access road to the south of Kiyikoy port which was previously difficult to access.
- Small-scale improvements to Kiyikoy port, including clearance of excess sediment and sand and installation of a new mooring jetty
- Small litter collection initiatives in Kiyikoy

At the end of 2018, further engagement meetings were held with stakeholders in Kiyikoy and Access-Route communities in order to identify and plan for potential community investments to be supported in 2019.

Through the process of identifying, developing and implementing CIP projects in partnership with stakeholders, the Project has been able to build relationships and trust with individuals and groups that otherwise may not be directly targeted by the Stakeholder Engagement Programme because of difficulties in accessing them. This includes women, youth, schoolchildren, and Roma members. In doing so, this CIP has served as a conduit to share other relevant information about the Project, even among groups who might not readily come forward or declare their interest in Project activities.

## **4.5 Regular Community Liaison and Relationship-Building**

### **4.5.1 Ongoing Community Liaison**

The Company is committed to ongoing dialogue with Local Communities about various aspects of the Project. The Company CLO based in Kiyikoy engages with Local Community residents and representatives on an ongoing basis to:

- provide information and updates about the Project and its progress;
- discuss environmental and social impacts and mitigation measures being implemented by the Company;
- liaise with stakeholders about the CIP; and
- respond to questions, receive feedback on issues, concerns and grievances.

Ongoing engagement is achieved with local communities via formal and informal meetings with community representatives and residents, notification meetings, as well as targeted engagement events with schools and other community organisations.

This ongoing dialogue is important to maintaining relationships, building trust, and ensuring community members are aware of the role of the CLO as the primary focal point for issues related to the Project. It also enables early identification of any potential issues or concerns which can feed into the management of activities.

#### 4.5.2 Kiyikoy Information Centre

The TurkStream Information Centre opened in Kiyikoy in December 2018. Residents can visit the Information Centre find out more information about the Project, ask questions and provide comments or lodge grievances. The information centre hosts a number Project information materials, including leaflets, brochures, posters, video displays and interactive displays. The centre is open for two afternoons every week and manned by the CLO and other representatives of the Project (see Figure 4-4).

**Figure 4-5 TurkStream Information Centre in Kiyikoy**



An opening ceremony was organised in which over 200 members of the community attended over a two hour period. Those who attended could meet with Project representatives and receive information about the Project (see Figure 4-5).



**Figure 4-6 TurkStream Information Centre Opening Event**



### **4.5.3 Events and Activities**

Wherever possible, the Project has sought to host or sponsor, or contribute to events and activities in the local community which bring together representatives of the Project, construction contractors and residents, and which highlight the Project's ongoing commitment to be a good neighbour in Kiyikoy.

In 2018, such events and activities have included:

- Organising an exhibition of children's photographs in Kiyikoy Ataturk Park in October 2018 (see Figure 4-6). The photographs were taken as part the Children's Photography workshop arranged by the Company. A photo booklet containing the photographs of each of the student participants was published and widely shared as part of this event. A follow up exhibition was organised in Istanbul at the Maritime Museum in December 2018 in which students were brought from Kiyikoy.
- Sponsoring a local football tournament in Kiyikoy, involving teams of residents and a TurkStream Project team in April – May 2018 (see Figure 4-7).
- Organising opening ceremonies for the Kiyikoy Culture, Arts and Training Centre in November 2018 and the TurkStream Information Centre in December 2018.
- Providing contributions towards Children's Day in April 2018 (see Figure 4-8), the Cabotage Festival in July 2018, Bayram celebrations in July and August 2018, and Republic Day event in October 2018. Some of these contributions have been undertaken as part of the Community Investment programme, such as arranging performances

during the Children's Day event, whilst others have involved distributing branded materials in aid of such events.

**Figure 4-7 Children's Photography Exhibition in Kiyikoy**



**Figure 4-8 Kiyikoy Football Tournament**





**Figure 4-9 Activities organised around Children's Day Event**



Additionally, the Company has organised visits to the construction site for regional and local authorities, community representatives, as well as media representatives, whereby participants have been able to learn more about Project activities first hand. Site visits in 2018 include visits to the onshore construction site in September 2018 and a visit to the Pioneering Spirit Offshore Pipelaying vessel in October 2018. As part of the Offshore Pipelaying completion ceremony on 21 November 2018 hosted by the Presidents of Russia and Turkey, regional and local officials and community representatives in Kiyikoy and surrounding communities were invited to attend and arrangements made for the participation in the event.

## **4.6 Media Engagement**

The Project regularly engages with journalists and media organisations at national and local levels to share information about Project activities, including information related to environment, social, cultural heritage measures and the community investment programme. Press releases are issued as necessary to inform media organisations about important milestones and notifications related to the Project.

Media engagements in 2018 included organising visits with journalists to see Project facilities in Russia and to the Pioneering Spirit vessel, hosting energy expert roundtables, and hosting a public media conference on the Project's environment and social activities which involved a presentation of these topics and a Q&A sessions with media representatives (see Figure 4-9).

**Figure 4-10 Media Conference on Environmental and Social topics**



## 5 Planned Engagements for 2019

The outcomes of the engagement programme to date, as well as anticipated Project impacts and associated mitigation and management measures, are considered in the planning and implementation of future Project engagement activities.

The Project is committed to maintaining relationships and communications with stakeholders following the completion of construction activities.

During the Construction and Pre-Commissioning Phase the emphasis of engagement shifts from seeking and incorporating stakeholder input in future plans, to consultation and disclosure of activities that are current or about to take place and receiving feedback from stakeholders regarding ongoing activities. Planned engagement activities will be commensurate with the status of construction activities and the potential impacts of these Project activities.

Engagement activities include:

- Ongoing engagement with regulatory authorities on matters of permitting and compliance with national requirements, including environmental reporting;
- Ongoing community and regular local authority liaison through the CLO to ensure that communities are informed about Project activities, can participate in decisions affecting their communities and have a focal point for feedback and grievances;
- Ongoing updates to stakeholders on Project progress, implementation of mitigation measures, compliance with ESMS and overall Project performance.

An overview of the anticipated engagement materials and methods that will be disclosed up to the end of the Construction and Pre-Commissioning Phase of the Project is outlined in Table 5.1.

Due to the changing nature of Project activities, the type of engagement during the Operational and Decommissioning Phase will be more limited in scope than the Construction and Pre-Commissioning Phase. The engagement materials and methods to be used during those Project phases will be determined closer to the start of those phases.

### 5.1 Summary of Upcoming Engagement Activities in Turkey

Ongoing engagement and liaison with Turkish authorities and the general public is envisioned in 2019. The Company will continue to make it accessible for stakeholders to contact the company with regard to any questions, comments or issues they may have. Project reports and updates will also continue to be published on the Company website and relevant stakeholders will be directly notified as appropriate.

**Table 5-1 Anticipated Timing of Planned Stakeholder Engagement Activities**

Planned Engagement Activity	Anticipated Date
Meetings to identify and develop additional Community Investment projects to be implemented during 2019.	Q1 2019

Planned Engagement Activity	Anticipated Date
Publication of the Environmental and Social Report	Q1 2019
Project update meetings with targeted stakeholders	Q1 2019 and on a quarterly basis.
Socio-economic perception survey	Q1 2019 and Q3 2019
Socio-economic monitoring meetings	Q1 2019 and on a quarterly basis
Meetings with animal husbandry members in Kiyikoy to identify measures to manage animal crossings during 2019 construction activities.	Q1 2019 and then ongoing
Project Information Market in Kiyikoy	Q2 2019
Awareness Raising Events	Q2 2019 - Ongoing
Engagements with targeted stakeholders regarding the conclusion activities of construction activities, and expected activities during the Operational Phase	Q3-Q4 2019
Community Investment Programme Feedback Assessment	Q3-Q4 2019
Stakeholder Engagement Plan: Update	Q3-Q4 2019

### 5.1.1 Engagement with Animal Husbandry members

Starting in early 2019, meetings will be organised with animal husbandry members at individual and group-level to update them on the Project construction schedule and activities and jointly discuss potential impacts that may arise. The meetings will focus on identifying potential measures to mitigate or minimise impacts that may arise in the coming year.

Thereafter, there will be engagement with animal husbandry members to implement measures and assess their effectiveness.

### 5.1.2 Publication of the Environmental and Social Report

The Project has prepared a non-technical Environmental and Social Report explaining the details of the Project, expected impacts, and mitigation measures to address these impacts. The report will be published in early 2019, and will be available on the Project website and in the local Info Centre.

### **5.1.3 Project Update Meeting with Targeted Stakeholders**

On a quarterly basis, the Project will organise targeted update meetings with community representatives and livelihood groups as applicable to share information about Project progress, relevant information concerning environmental and social issues, and on planned and upcoming activities.

These meetings aim to ensure a more structured level of dialogue and information sharing. Participants will have the opportunity to provide feedback on the Project and raise any issues or concerns which can be considered in the ongoing planned of the Project.

During the second half of 2019, meetings will also be arranged to inform stakeholders about the conclusion of construction activities and expected activities that will occur during the Operational Phase. These meetings will also serve to inform stakeholders about any expected impacts during the operational phase, and answer questions about operational phase activities.

### **5.1.4 Information Market in Kiyikoy**

Similar to the Open Day event held in November 2017, the Project will arrange a public information event in Kiyikoy to coincide with spring / summer 2019. Information materials and presentations will be made available at the event, and Project representatives present to answer questions.

The Project will discuss concepts for running the event with appropriate stakeholders in the run-up, to ensure that the event is fit for purpose and incorporates specific information or activities suggested by stakeholders.

### **5.1.5 Socio-economic Monitoring**

Quarterly engagement meetings with community representatives and potentially affected stakeholders will continue as part of the socio-economic monitoring programme.

In addition, the Project will undertake a community perception survey in January 2019 to baseline and monitor attitudes towards various aspects of the Project's health, safety, social and environmental performance. This survey will be replicated again later in the year.

In addition to the above, the Project will liaise with relevant stakeholders, on an as needed basis, to inform them about specific monitoring results, such as air quality, noise, water quality. An Environmental and Social Monitoring Report is prepared on an annual basis and relevant findings from the 2018 report will be shared with interested stakeholders.

### **5.1.6 Community Investment Programme**

Meetings will be organised with stakeholders in Kiyikoy as well as the Traffic-Affected Communities of Gungormez and Bahcekoy in early 2019 to discuss and agree on additional community investment initiatives to be undertaken in 2019. This will also involve engagement to progress initiatives already identified in 2018, but have yet to be implemented.

As engagement is an ongoing component of the CIP, stakeholders involved in the development and implementation will be kept up to date on the progress of the CIP and specific projects. The Project shall also seek to share information on the CIP more widely in the local communities



through events and activities linked to the CIP, and through dissemination of information materials.

An assessment will be performed in the second half of 2019 involving dialogue with CIP project beneficiaries and CIP partners to evaluate the outcomes of CIP initiatives.

#### **5.1.7 'Awareness Raising' Events**

The Project will continue to identify opportunities to share information about the Project through 'Awareness Raising' Information Events. This may include presentations to schools in Local Communities to increase awareness of the Project and educate students about issues such as environmental protection, construction techniques, etc., or visits to the construction site.

## **6 Roles and Responsibilities in 2019**

The Project's Stakeholder Engagement Team is the focal point for communications and engagements with stakeholders at local and regional level.

The overall Senior Stakeholder Engagement and Corporate Social Responsibility Expert for the TurkStream Gas Pipeline – Offshore Section is responsible for stakeholder engagement activities across Russia and Turkey, and has management oversight of the stakeholder engagement programme. Working with the Senior Stakeholder Engagement and Corporate Social Responsibility Expert is a Senior Stakeholder Engagement Expert responsible for the planning and implementation of engagement activities specific to Turkey. Part of this role is to manage the recording of stakeholder engagement activities and to oversee the implementation of the Grievance Procedure.

The Community Liaison Officer (CLO) will continue working with the Senior Stakeholder Engagement Expert to ensure direct liaison with Local Communities and other Project stakeholders. The CLO is accessible to local communities and other interested or potentially affected stakeholders and is the first point of contact in relation to community questions, complaints or grievances. He will also assist in the identification and resolution of issues or grievances that could arise from the Project.

StratejiCo, a community engagement consultant, supports the Project's stakeholder engagement activities in Turkey. StratejiCo provides advisory and strategic guidance on community engagement and social management activities, as well as direct support in implementing these activities.

ÇINAR Mühendislik Müşavirlik A.Ş., is the Environmental and Social Monitoring contractor for the Project and undertakes the Project's socio-economic monitoring programme, including evaluating the Project's performance in managing social issues.

Construction Contractors have their own Corporate Social Responsibility and Stakeholder Engagement experts, who support the Project's external stakeholder engagement programme where there are issues which overlap with construction activities. The Grievance Procedure for the Local Communities is managed in co-ordination between the Project CLO and the Contractor to manage and resolve community concerns.

The stakeholder engagement programme is under the responsibility of the Project's Construction Department, and the Stakeholder Engagement Team liaises closely with the Project's Communications Department in the development and implementation of the engagement programme. The programme, along with supporting tools and processes, is communicated internally through formal procedures and management practices (e.g. meeting plans and pre-meeting briefings, standard Question-and-Answer resources), trainings (e.g. media training, stakeholder engagement training for field staff), and documentation (e.g. minutes of meetings, Stakeholder Engagement database).

## **7 Contact with South Stream Transport**

### **7.1 Feedback Process**

Stakeholders are invited to provide feedback about the Project. This lets us know how we are doing, and helps us identify areas that might be improved. Feedback may include questions, comments, and requests for information, suggestions, concerns, or complaints. These can be provided in person, over the phone, or in writing by email, fax or post. The Project will treat all types of feedback with professional consideration and respect, and base our responses on open and honest communication.

In order to effectively manage, respond to, and benefit from stakeholder feedback, all feedback received is subject to a consistent Feedback Process. As part of the Feedback Process, the Project will:

- document all feedback;
- forward to the relevant people within the company;
- consider within the ongoing planning and implementation of the Project, including management and monitoring programmes; and
- provide responses where needed.

Stakeholder feedback may also manifest through external channels, such as the media and social media. Where this type of feedback is identified, it may also be tracked through the Feedback Process to ensure that the Project is aware of (and proactively addressing) current issues and perceptions.

While some feedback may be positive, some people may have complaints about Project activities. The Project is committed to treating complaints with the same consideration and respect as other types of feedback. The Project will work with all parties to address complaints and concerns. This process is managed through the company's Grievance Procedure.

Stakeholders can contact the Project at any time by letter, phone, fax or email. Contact information is available on the website, and is included in all external publications and communications (including reports, leaflets, letters, emails, etc.). These publications and communications have encouraged stakeholders to contact the company directly if they have comments or questions.

Communications with the Project can be conducted in English, Russian or Turkish. Meetings with Project representatives can be arranged as needed.

*Communications can be sent to:*

- **TurkStream Gas Pipeline – Offshore Section – Branch Office**

South Stream Transport B.V. Turkish Branch  
Eski Buyukdere Cad. No. 26 (Windowist Tower)  
34467 Maslak, Sarıyer, Istanbul, Turkey  
Phone: +90 212 9008320

- **TurkStream Gas Pipeline – Offshore Section – Company Office**

South Stream Transport B.V., Permitting Department  
Parnassusweg 809,  
1082 LZ Amsterdam, The Netherlands  
Phone: +31 (0)20 262 45 00  
Fax: +31 (0)20 524 12 37

- **Turkish Community Information Centre**

Cumhuriyet Mah. Cumhuriyet Cad. No. 5A-5B  
Kiyikoy 39400 Vize, Kırklareli  
Phone: +90 212 900 8325 / +90 549 460 9928  
Email: emre.kapusuz@turkstream.info.

*Or comments may be submitted by:*

email to: [feedback@turkstream.info](mailto:feedback@turkstream.info)  
via website: <http://turkstream.info/about/feedback>

### **7.1.1 Overview**

A grievance is a complaint that someone has about the activities of the Project or South Stream Transport. A grievance might be related to an incident, the environment, or the behaviour of people.

In line with good international industry practice, the Project has established a Grievance Procedure which aims to ensure that any grievances associated with Project activities are addressed in good faith through a transparent and impartial process.

Specific objectives of the Grievance Procedure are:

- to help the Project identify issues and concerns early, so that we can address them quickly and proactively;
- to continuously improve Project performance in all areas; and
- to demonstrate the Project's commitment to meaningful stakeholder engagement, and respect for local opinions and concerns.

The Grievance Procedure will be used during the development, construction, operation and, ultimately, decommissioning of the Project, the, working in partnership with its contractors as a critical component of the broader Feedback Process and other stakeholder engagement activities.

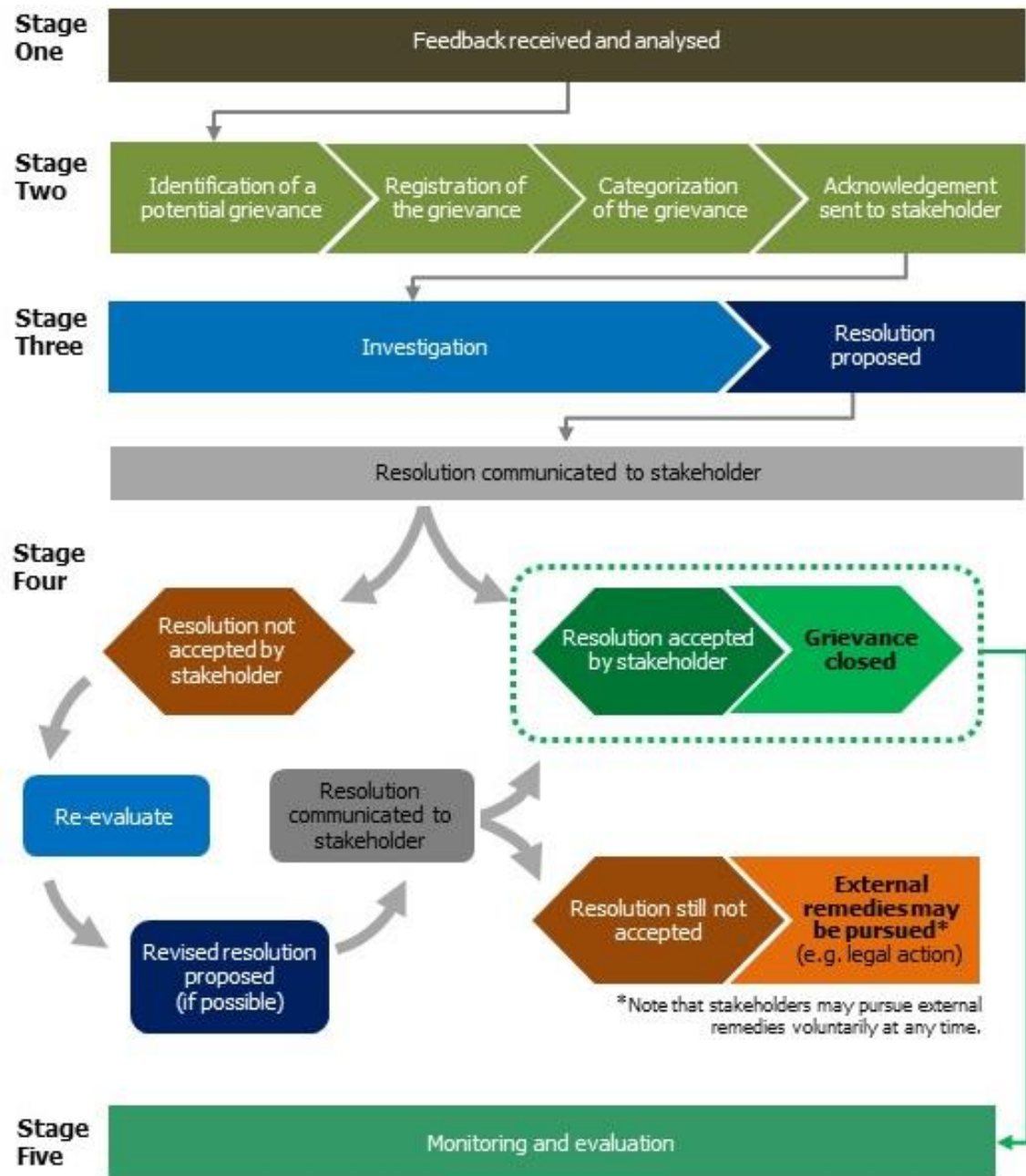
## 7.1.2 Grievance Procedure Process

A summary of the process for identifying, investigating and resolving grievances is provided in Figure 7-1 below. The Grievance Procedure itself will be published on the Project's website in a non-technical format and stakeholders will be notified as appropriate.

**Figure 7-1 Grievance Procedure Process**

Stage	Description
Stage 1: Feedback received	<ul style="list-style-type: none"> <li>Comments and questions are received and analysed as part of the standard Feedback Process. All communications are subject to the Feedback Process, which ensures that feedback is documented, incorporated, and responded to as needed.</li> <li>In some cases, this process may identify a grievance. If so, Stage 2 of the Grievance Procedure is initiated.</li> </ul>
Stage 2: Grievance logged	<ul style="list-style-type: none"> <li>When a grievance is identified, it is officially registered and given a unique identification number.</li> <li>It is categorised based on the type of complaint and its severity.</li> <li>An initial response is sent to the person(s) who raised the grievance within seven (7) working days, acknowledging their feedback and describing the next steps in the grievance process, time estimates for these steps and a contact person.</li> </ul>
Stage 3: Investigation and resolution	<ul style="list-style-type: none"> <li>The Project will investigate grievances and their surrounding circumstances. These investigations will be undertaken in a timely manner. Investigations may include photographs and other evidence, witness statements, interviews with affected stakeholders and other parties, review of site registers, and other information gathering activities.</li> <li>The results of these investigations will be reviewed and a resolution will be proposed. The development of the resolution may involve consultation with the person(s) involved. The proposed resolution will then be formally communicated to all parties.</li> </ul>
Stage 4: Resolution accepted (or not accepted)	<ul style="list-style-type: none"> <li>If the resolution is accepted by all parties, it is implemented and the grievance is closed.</li> <li>If the resolution is not accepted, it will be reconsidered and a revised resolution may be proposed.</li> <li>The affected person(s) may choose to pursue external remedies (e.g. through legal proceedings) at any time, including if an agreed resolution cannot be found. However, the Project is committed to fairly and collaboratively resolving grievances through the Grievance Procedure wherever possible.</li> </ul>
Stage 5: Monitoring & Evaluation	<ul style="list-style-type: none"> <li>After the accepted resolution has been implemented, it will be monitored and its effectiveness will be evaluated. All parties will be notified that the resolution has been implemented and will have the opportunity to provide feedback on the grievance process and its implementation.</li> </ul>

**Figure 7-2 Grievance Procedure Flowchart**



### 7.1.3 Compensation Management and Livelihood Restoration Framework

In certain circumstances, where it has not been possible to adequately mitigate for a significant adverse impact by avoiding or minimising the impact, it may be appropriate to provide compensation. Compensation may also comprise livelihood restoration measures, to provide for the possibility that livelihood impacts do occur.

The Project has developed a Compensation Management and Livelihood Restoration Framework to guide the evaluation and determination of compensation and livelihood restoration measures. The Framework captures the process and requirements for assessing compensation claims and implementing compensation measures. Compensation measures may include financial compensation or in-kind contributions. The Framework also defines the process that will be undertaken to identify the need for specific livelihood restoration measures where applicable.

The Compensation Management and Livelihood Restoration Framework is closely tied to the Grievance Procedure. As part of the process of implementing the Framework, the Project works with the affected stakeholders in order to identify appropriate compensation or restoration measures.



## **8 Monitoring and Reporting**

### **8.1 Monitoring**

It is important to monitor stakeholder engagement to ensure that consultation and disclosure efforts are effective, and in particular, that stakeholders have been meaningfully consulted throughout the process. Stakeholder engagement monitoring is managed through the Project's ESMP.

Monitoring will include:

- auditing implementation of the Stakeholder Engagement Plan;
- monitoring consultation activities conducted with government authorities and non-governmental stakeholders;
- monitoring the effectiveness of the engagement processes in managing impacts and expectations by tracking feedback received from engagement activities; and
- monitoring any grievances received.

### **8.2 Tracking Stakeholder Engagement Activities**

Performance will be reviewed regularly against the Stakeholder Engagement Plan. Tracking of stakeholder engagement will be used to assess the effectiveness of the Project's stakeholder engagement activities. Indicators for tracking will include:

- materials disseminated: types, frequency, and location;
- numbers and types of grievances and the nature and timing of their resolution;
- recording and tracking commitments made to stakeholders; and
- community attitudes and perceptions in Turkey based on media reports and stakeholder feedback.
- Number of face-to-face engagement events held with stakeholders, including a breakdown for those categories:
  - Landowners;
  - Land users;
  - Community Representatives;
  - Residents of local communities (incl. Bahcekoy and Gungormez communities);
  - Local businesses and business associations;
  - Non-Governmental Organisations (NGOs), including community-based organisations;
  - Marine area users;
  - Academic and research organizations;
  - Community services and infrastructure providers;
  - National, regional and local authorities;

- Other third parties.
- Number of public updates through communications / materials (e.g. through newspaper announcements, website releases, information materials, notice boards, individual mail-outs / notifications) regarding construction activities and Project progress
- Number of public events of various types (community meetings, awareness-raising events & public presentations, community door knocking, etc.), in order to indicate the number of participants for each event with a breakdown for age and gender.
- Number of meetings (formal / informal) in which stakeholders have been informed about Project progress (e.g. prior notification, construction updates, etc.).

## **8.3 Project Reporting**

### **8.3.1.1 Internal Reporting**

Quarterly reports will summarize all activity for the period, and provide a summary of issues raised and how they have been addressed, including timeliness of responses and corrective and mitigation measures to address grievances, and analysis of trends in key performance indicators (KPIs). These will include:

- total numbers of stakeholders engaged according to stakeholder category;
- numbers of comments and queries received according by topic and responses given;
- issues raised and levels of support for and opposition to the Project;
- numbers of grievances lodged; and
- time to resolution of grievances.

### **8.3.1.2 External Reporting**

The SEP will be reviewed on a regular basis and revised as needed to reflect completed engagement activities and revise and confirm future engagement plans.

During the Construction & Pre-Commissioning Phase, the Project will report regularly via its website and in local communities in Turkey and Russia on Project progress, implementation of mitigation measures, compliance with ESMS and overall performance.

During the Operational Phase, the Project will continue to provide updates as necessary, although it is difficult to predict what events will occur over an operational lifecycle of 50 years. The Project anticipates providing information to stakeholders which will focus on non-routine activities, after an unplanned event or incident (if one occurs), or if there is a change to Company personnel who act as stakeholder focal points.

## **8.4 Stakeholder and Consultation Database**

The Project has developed a Stakeholder Consultation Database (SCD) which formalizes the stakeholder engagement process in order to ensure that all Project stakeholder communications are documented. This database is regularly updated to ensure engagements and communications

are tracked. The SCD is a valuable tool to coordinate information about stakeholder engagement activities among the Project and its contractors and sub-contractors.

The SCD is used to store, retrieve and analyse information for all stakeholder communications and consultations. It allows data to be entered from meetings (e.g. minutes of meetings) and communications (e.g. letters, notifications, emails, and face-to-face or telephone discussions). Those documents are recorded into the Project's internal data management system.

Actions arising from meetings and other engagements are also recorded and tracked, with a responsible person dedicated to closing each action.





## Contact

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Windowist Tower Eski Büyükdere Cad. No. 26  
Maslak 34467 Sarıyer İstanbul Türkiye  
[trbranch@turkstream.info](mailto:trbranch@turkstream.info)  
+90 212 900 83 21

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