



Stakeholder Engagement Plan

**TurkStream Gas Pipeline – Offshore
Section: Operations Phase**

December 2019

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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 the operational phase of the Project are communicated and understood by all those concerned.

The SEP explains the Project engagement programme with stakeholders during the operational phase of the Project, as well as summarises the engagement programme undertaken during the construction phase 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 has been developed progressively, and updates issued, as the Project had moved through the various phases of planning and implementation (see SST-Stakeholder Engagement Plans for 2017 and 2018 – SST-EIA-PLAN-215238 which are hosted on the Project website, www.turkstream.info). 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 Operations Phase of the Project starting at the end of 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 during the Construction and Pre-Commissioning Phase of the Project (start of 2018 – December 2019);
- Section 5 provides the programme for ongoing and future engagement for the Operations Phase, including the transition phase between construction and operations (starting January 2020 and beyond);
- 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.

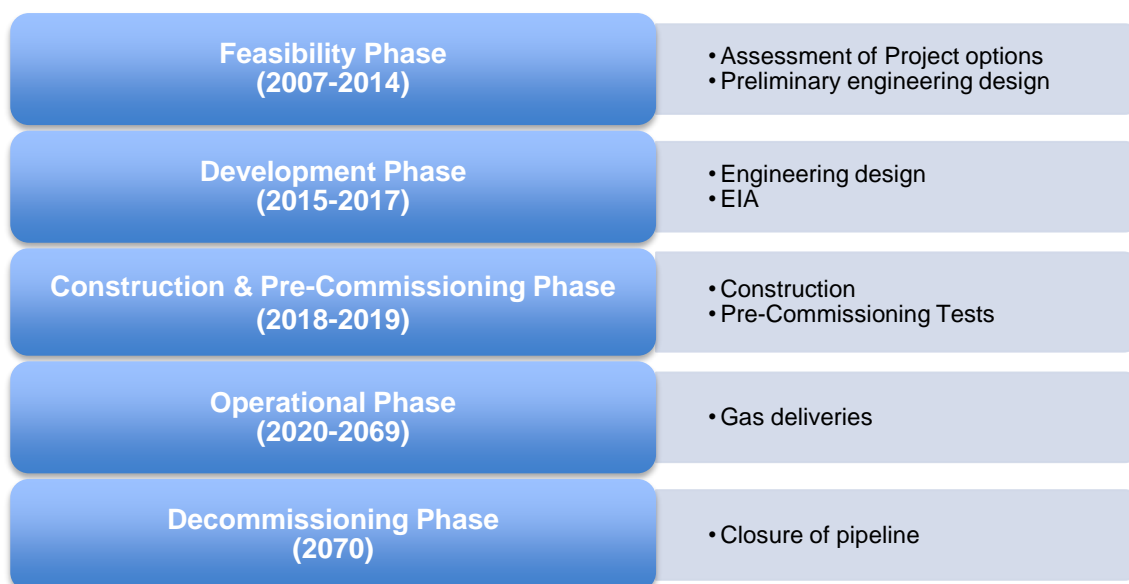
The landfall section of the Project is located within the Municipality of Kiyiköy, in Vize District of Kırklareli Province. The nearest residential area is the community of Kiyikoy, approximately 2 km south of the landfall location. The shore crossing (where the Project transitions from sea to land) 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 have been designed and constructed by South Stream Transport B.V.

The onshore segments 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 has been developed in phases, illustrated below.

Figure 1-2 Project Phases



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 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 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. Engagement activities comply with 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;
- comply 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 developers of the Onshore Section 1 project (BOTAS) and the developer of the Onshore Section 2 project (a Gazprom-BOTAS joint venture) on a variety of issues as part of the interface management process during the construction and operations phases of the projects.

Regular site-level meetings have been held in Kiyikoy during simultaneous construction phase activities. Regular coordination and progress meetings are also held at management level. If and when stakeholder concerns common to each project are identified the relevant companies work together to coordinate responses to these concerns where applicable. Furthermore, where grievances or queries are raised by stakeholders relating to the Onshore Section projects are received by the Offshore Section Company, these are forwarded to representatives of the Onshore Section developers to consider or respond to as 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 and regulatory framework is detailed in Appendix A.

Beyond the EIA process, there are no regulatory requirements with respect to stakeholder engagement.

2.2 Good International Industry Practice

The Project's approach to stakeholder engagement complies with the principles of GIIP, including:

- The Common Approaches to Environmental and Social Due Diligence developed by the Organisation for Economic Cooperation and Development (OECD);
- The Equator Principles (EP), a credit risk management framework for determining, assessing and managing environmental and social risk in project finance transactions. Principle 5 sets out guidance for stakeholder engagement; and
- The Performance Standards (PS) of the International Finance Corporation (IFC) (part of the World Bank Group). PS 1, regarding the assessment and management of environmental and social risks and impacts, includes guidance for stakeholder engagement.

These standards and guidelines all adopt a similar approach to stakeholder engagement. They 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 to meet these commitments to adhering to GIIP. These supplementary engagement activities are described further in this SEP.

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

Figure 2-1 Summary of International Guidelines on Stakeholder Engagement

Consultation	<ul style="list-style-type: none">• 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• Tailor so that it meets stakeholders' needs and interests, including vulnerable groups
Disclosure	<ul style="list-style-type: none">• 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
Grievance Resolution	<ul style="list-style-type: none">• Put in place a transparent and fair mechanism, at no cost to stakeholder, to record and resolve community grievances
Project Management	<ul style="list-style-type: none">• Establish an Environmental and Social Management System to manage environmental and social issues• Develop a Stakeholder Engagement Plan

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

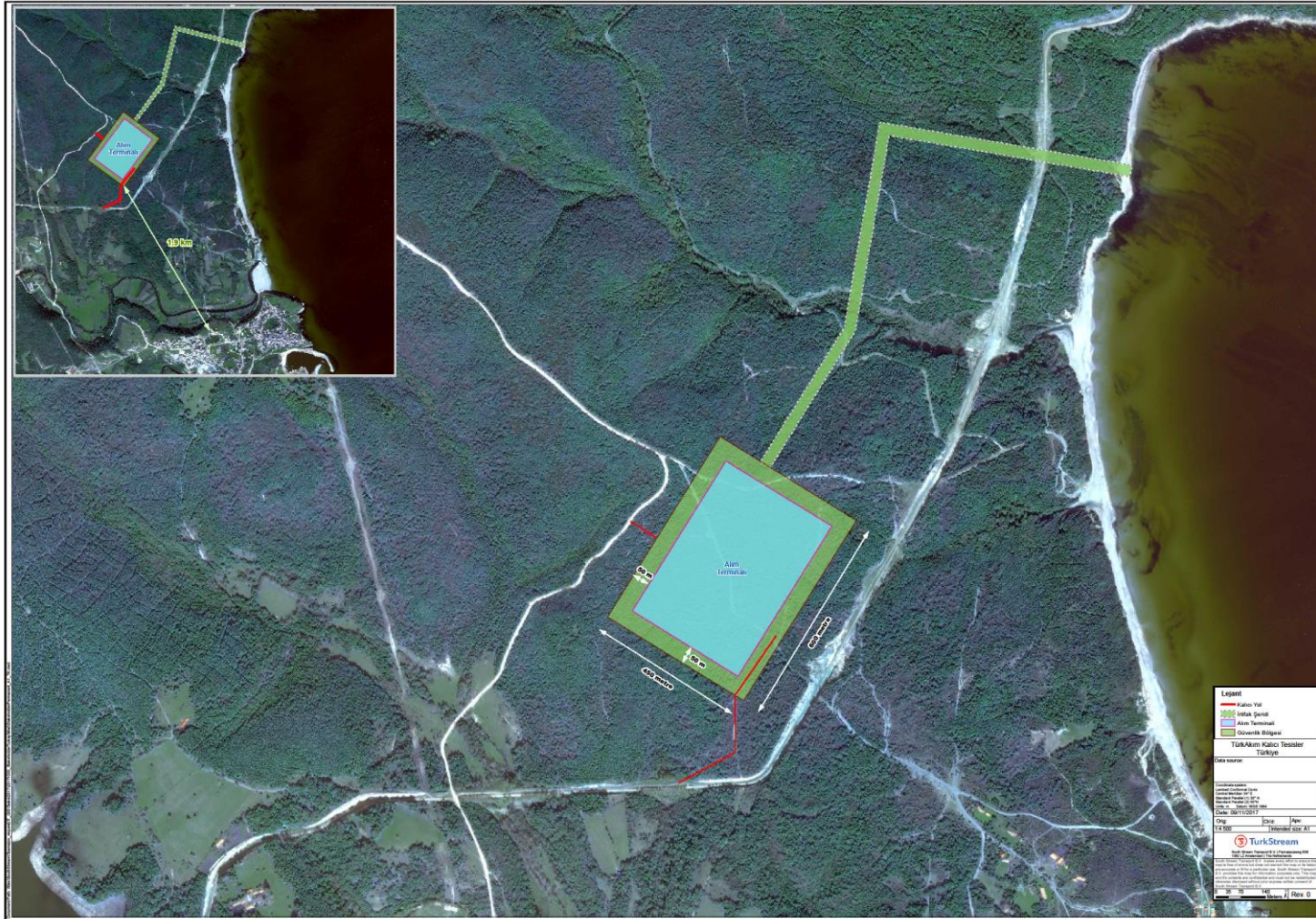
3.1.1 Overview

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 contributor 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) Gungormez village (population approximately 1300), both within Saray District, are located approximately 13 km and 20 km away to the southwest of the landfall location. Komurkoy village (population approximately 450), located in Vize District, is located approximately 16 km to the west of the landfall location. However, these villages are located along Project construction traffic transportation routes. Each of these villages are primarily involved in traditional livelihood activities such as lumbering and animal husbandry.

Figure 3-1 Map of Project Location in Kiyikoy



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 Receiving terminal and the potential for community receptors to experience environmental and social (including livelihood) impacts during the operations phase, including potential legacy issues of construction phase impacts. Project activities occurring beyond the fenced boundary of the Receiving Terminal during operations are very limited and offsite impacts, such as from noise and air emissions, are not expected to have significant impacts on nearby receptors.

Bahcekoy, Gungormez, Saray and Komurkoy 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 the main traffic impacts are associated with Construction Phase activities, there will continue to be Project traffic movements during the transition into operations, associated with the demobilisation of site equipment. At the time of writing, it is expected that most of this traffic will use the route Kiyikoy-Vize route, rather than the Kiyikoy-Saray route.

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.

After the above listed activities and associated traffic movements are completed, Traffic-Impacted Communities will no longer be considered as Local Communities for the purposes of stakeholder engagement planning.

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

Local Community	Estimated Population	Approximate Distance from Landfall Location
<i>Vize District</i>		
Kiyikoy town	1977	2 km
Komurkoy village	450	16 km
<i>Saray District</i>		
Bahcekoy village	356	13 km
Gungormez village	1,316	2 km
Saray city	49,460	28 km

Within the local community of Kiyikoy, there are number of specific areas or special interest groups based on the potential for Project activities to affect them, 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, who are reliant on visiting tourists for income, and some of which overlook the area of the landfall location. A proportion of the tourism services in Kiyikoy are affiliated to the Kiyikoy 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; and
- Individuals involved in animal husbandry and beekeeping who are located close to Receiving Terminal¹.

3.1.3 Other Communities

During the operations phase, the Project will interact with other communities in Turkey which have not been designated as Local Communities for the purposes of the stakeholder engagement process. Most notably the districts of Vize and Saray, and the Provinces of Kırklareli and Tekirdağ, where relevant authorities are consulted as needed.

The communities of Aksicim, Balkaya, Hamidiye, Kislacik, Kizilagac, Komurkoy, Bahcekoy and Gungormez² 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 – thereby minimising the potential for social or economic impacts on these communities.

During operations, the Project will still require services such as transport, catering, security, cleaning and will need to continue to purchase general supplies. As such, there may be limited economic benefits to surrounding villages and the Saray and Vize districts in general, arising from employment and procurement opportunities.

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.

¹ At the time of writing, there are no associations or cooperatives that collectively represent animal husbandry or beekeeping activities in Kiyikoy.

² The communities of Bahcekoy, Gungormez, Saray and Komurkoy were previously considered Local Communities during the Construction Phase on the basis of Project traffic impacts during the construction phase.

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.

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 during the operations phase (e.g. potential impacts, benefits, concerns)³ and how these groups will be engaged during operations.⁴

³ This differs from the interests of these groups during the construction phase of the Project. Information on stakeholder identified, their interests and a summary of engagement is contained in previous versions of the SEP covering the years 2017 and 2018.

⁴ It should be noted that at local Kiyikoy level, there is a degree of overlap between the different Stakeholder categories and groups that have been identified.

Table 3-2 Stakeholder Categories and Identification

Interest in the Project	Stakeholders Identified	Anticipated Engagement during Operations Phase
Land Owners		
<p>The Project required some 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 18 private land plots was required to widen roads near Kiyikoy to make them suitable for access to the Receiving Terminal.</p> <p>Private landowners along Project access roads will primarily be interested in road conditions, maintenance and any handback of roads used during construction, as well as Project traffic movements during operations.</p> <p>Additionally, some landowners in the vicinity of the Project may be affected by Project activities, including changes to viewscapes.</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 will engage with the Ministry of Forestry and Water Affairs and other state agencies who own the majority of the land affected by the Project regarding the return of temporary construction areas and land which will be retained for Operations, including applicable access roads.</p> <p>Private landowners close to Project access roads will be informed about the Project's strategy to either retain or handback access roads, including any relevant information such as maintenance of these roads. They will also be informed about expected traffic volumes related to construction phase demobilisation, and expected traffic volumes during operations.</p> <p>This engagement will occur on an ongoing basis until early 2020, when the construction demobilisation is expected to be completed. Thereafter, it is anticipated that engagement will only be required in the event of any road maintenance activities and / or in the event of an unexpected high volume of heavy traffic movements or movements of out-sized vehicles.</p>
Land Users		
<u><i>Animal Husbandry</i></u>		
<p>The Project required some temporary and permanent acquisition of land within the forest, which is used by animal husbandry enterprises.</p> <p>Animal husbandry enterprises will primarily be interested in whether the Operations Phase will have any impacts on their livestock, or surrounding grazing lands and water sources used by animals.</p> <p>Interests or issues in relation to the Project may include:</p> <ul style="list-style-type: none"> • Reinstatement of temporary areas, including return of access roads; • Potential legacy issues related to construction, which may have an effect on surrounding grazing lands, water sources, or access to these resources 	<p>Kiyikoy Animal Husbandry Enterprises, particularly the 20-30 located close to the Receiving Terminal</p> <p>Kiyikoy representatives of Kirklareli Water Buffalo Union</p>	<p>There will be ongoing engagement with animal husbandry enterprises and representatives until mid-2020, especially during reinstatement and demobilisation. Engagement activities will focus on informing these stakeholders about Project activities and identifying measures to minimise potential impacts. Information about the Operations Phase relevant to herders will also be shared.</p> <p>Thereafter, animal husbandry enterprises will continue to have access to the Grievance Procedure, should any issues arise during operations. It is likely that there will be continuing interactions with animal owners on an informal basis given that many of them will be grazing their herds close to the boundaries of the Receiving Terminal. Formal Project notifications and updates will be shared on an as needed basis.</p>

Interest in the Project	Stakeholders Identified	Anticipated Engagement during Operations Phase
<ul style="list-style-type: none"> Condition of roads used by the Project, condition of roads handed back, and expected traffic movements during demobilisation and through Operations, given their use of these routes as animal crossings; Any security restrictions, or maintenance / unforeseen future activities that may result in a temporary loss of access to grazing lands; Safety and security of the facility, including emergency response. <p>There are likely to be interactions with animal owners close to the borders of the Receiving Terminal and nearby roads given that their animals will be grazing in this area.</p>		Relevant monitoring information related to animal husbandry will be shared as applicable.
<i>Forestry</i>		
<p>The Project required some temporary and permanent acquisition of land within the forest, which is used for lumbering.</p> <p>Kiyikoy and Vize Forestry Directorates will primarily have an interest in the reinstatement of forest areas and the hand back / maintenance of access roads. The development of emergency response plans, particularly in relation to prevention and management of forest fires, will also be of concern to them.</p> <p>The Kiyikoy Agricultural (Forestry) Cooperative and Forestry workers will be primarily interested in the reinstatement of forest areas, and any potential reforestation that occurs, which may return the forest to productive use. They may also be interested in the condition of any roads used by the Project, as these routes are used to access forest areas for lumbering. They may also have an interest in emergency response plans particularly in relation to prevention and management of forest fires.</p>	<p>Kiyikoy Forestry Directorate Vize Forestry Directorate Forestry (lumbering) industry</p> <ul style="list-style-type: none"> Management Board of Kiyikoy Agricultural Development (Forestry) Cooperative Forestry workers 	<p>There will be close coordination with the relevant Forestry Directorates regarding reinstatement activities, return of forest land and forestry roads, and the development of emergency response procedures, including fire safety.</p> <p>Engagement will occur with the Agricultural (Forestry) Cooperative to inform them about reinstatement and reforestation plans, road handback and maintenance, as well as emergency response procedures. Thereafter, forestry workers will continue to have access to the Grievance Procedure. Formal Project notifications and updates will be shared on an as needed basis.</p> <p>Relevant monitoring information related to forestry will be shared as applicable.</p>
<i>Beekeepers and other forest users</i>		
<p>Beekeepers may be interested in reinstatement and to understand if there will be any potential impacts on beekeeping during operations.</p>	<p>Beekeepers in Kiyikoy Local foragers Hunters</p>	<p>It is not expected that the operations phase will have an impact on beekeeping. Beekeepers, particularly those close to the Receiving Terminal, will be informed about operations phase activities and any queries will be answered. Thereafter, they will have access to the Grievance Procedure.</p>

Interest in the Project	Stakeholders Identified	Anticipated Engagement during Operations Phase
Other users of the forest, such as foragers and hunters, may have similar interests, and may also be interested in any security restrictions around the Receiving Terminal.		For other users of the forest, such as foragers and hunters who are not formally organised and less easily identifiable, relevant information will be shared via local authorities and community representatives for further dissemination.
<i>Beach users and campers</i>		
<p>Local residents and people visiting Selves beach, including the shore-crossing section, and nearby campers and camp operators, may have interests in the following:</p> <ul style="list-style-type: none"> Any restrictions due to the presence of the pipelines; Safety of the pipelines and emergency response procedures; Access to Selves beach, the shore-crossing and the condition of the roads. 	<p>Beach users (locals and tourists)</p> <p>Camp users</p> <p>Camp operators and business located next to Selves and Municipal beaches in Kiyikoy</p> <p>Vize Kiyikoy Tourism Association</p>	<p>Although no organised group of beach users or recreational visitors have been identified, a combination of engagement with Kiyikoy Municipality, muhtars, Vize Kiyikoy Tourism Association, and Camp operators and businesses will be used to ensure relevant information is disseminated. Engagement will focus on explaining aspects of the operations phase and responding to queries specifically about beach use, safety and access.</p> <p>Information materials will also be present in the community which will respond to potential queries about beach use.</p> <p>During summer, when tourism is at its highest, there will be liaison with Kiyikoy Municipality and Kiyikoy Gendarmerie to prevent visitors trespassing into the Receiving Terminal.</p>
Marine Area Users		
<i>Fisheries</i>		
<p>Fishermen and fisheries organisations (including fishing businesses) will primarily be interested in whether the pipelines and Receiving Terminal may impact fish or fishing activities during operations. Specific issues may include:</p> <p>The following issues will be of interest to fishermen and divers:</p> <ul style="list-style-type: none"> Restrictions on fishing / diving in the vicinity of the pipelines; Potential impacts on local nearshore fishing grounds and on fish catch from the pipelines; Lighting of the Receiving Terminal and whether this will impact nearshore fishing grounds. 	<p>Kiyikoy Fishing Cooperative, local Kiyikoy fishermen, divers.</p> <p>Igneada Port Authority (the designated authority for Kiyikoy port)</p> <p>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>During 2020, there will be ongoing engagement with fisheries in Kiyikoy to explain relevant activities related to operations, as well as to monitor potential impacts on fishing.</p> <p>Information materials with relevant information on the marine environment and fishing will also be prepared and distributed.</p> <p>Thereafter, fisheries will continue to have access to the Grievance Procedure, should any issues arise during operations. Relevant notifications and Project updates will be shared in consultation with the Kiyikoy Fishing Cooperative and Igneada Port Authority.</p>

Interest in the Project	Stakeholders Identified	Anticipated Engagement during Operations Phase
Interactions with fishermen may also occur if there are incidents whereby fishing gear becomes caught or damaged by the pipelines.	National Union of Fisheries Cooperatives (SUR-KOOP)	
<i>Other Third-Party Marine Users</i>		
Offshore oil-and-gas exploration companies and shipping have an interest in accessing and using the marine area.	Turkish Petroleum Corporation (TPAO), and other third party exploration or research enterprises Shipping	Liaison with TPAO and other potential entities conducting exploration and research will occur in the event simultaneous operations requiring coordination and interface. Maritime navigation charts will mark the position of the pipelines and notify any restrictions in place. These will be shared via with other marine users via maritime authorities in accordance with Turkish maritime procedures. Should any further offshore pipeline inspection surveys occur, these will also be notified through the appropriate maritime channels.
Traffic-affected Communities and Receptors*		
Local communities, individuals and businesses located on Project 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. *Note: Traffic-affected communities will mainly be receptors for the period that Project construction traffic continues.	Community of Bahcekoy (including muhtar, residents, business, and community services such as health and education) Community of Gungormez (including muhtars, residents, business, and community services such as health and education) Saray (including residents, business, and community services such as health and education) Community of Komurkoy (including muhtars, residents, business, and community services)	Engagement with representatives from Bahcekoy, Gungormez and Komurkoy will continue during the transition into operations to inform them about traffic movements related to demobilisation of the construction site. The Grievance Procedure will continue to be accessible in these communities, to manage any potential complaints about traffic. Similarly, engagement will continue throughout the period of Project traffic movements, with the households located adjacent to the main access road in Kiyikoy to monitor the effectiveness of traffic mitigation measures. Dedicated engagement will occur with animal husbandry owners who are located close to Project access roads with a view to minimising disruption in access to grazing lands.

Interest in the Project	Stakeholders Identified	Anticipated Engagement during Operations Phase
	<p>Animal husbandry owners located along Kiyikoy construction access roads</p> <p>4 Households located adjacent to Kiyikoy access road</p>	
Local Government and Community Representatives		
<u>Local Authorities</u>		
<p>Kiyikoy Municipality, including the Mayor and the Municipal Council, have a general interest in the potential impacts and benefits of the Project.</p> <p>Potential areas of interest or issues relevant to Kiyikoy Municipality during the Operations Phase include:</p> <ul style="list-style-type: none"> • Reinstatement of temporary areas, including return of access roads • Condition of roads used by the Project; • Safety and security of the facility, including emergency response; • Any non-routine activities or irregular Operations Phase activities, such as venting. • Whether the Project will have impacts on tourism numbers of the development of the tourism industry • Benefits of the Project, including local employment, local procurement and community investments/contributions. 	<p>Kiyikoy Municipality</p> <p>Kiyikoy Municipal Council</p> <p>Kiyikoy Gendarme</p>	<p>There will be regular engagement with Kiyikoy Municipality during the transition into full operations until mid-2020, in order to keep them informed about Project activities and explain anticipated activities and impacts of the operations phase. Interactions with Kiyikoy Municipality will also occur on issues related permits and any service agreements, such as for waste disposal.</p> <p>Thereafter, it is anticipated that engagement will occur on a quarterly basis at least to keep them informed about Project activities and respond to any issues that might arise.</p> <p>There will be ongoing coordination throughout the operations phase with Kiyikoy Municipality and Kiyikoy Gendarme related to security.</p>
<u>Community Representatives</u>		
<p>Within Kiyikoy, there are also local representative 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</p>	<p>Kiyikoy Muhtars (three muhtars of Cumhuriyet, Kale and Güven neighbourhood respectively).</p> <p>Management Board of Kiyikoy Fishing Cooperative</p>	<p>There will be regular engagement with Kiyikoy community representatives during the transition into full operations until mid-2020, in order to keep them informed about Project activities and explain anticipated activities and impacts of the operations phase.</p>

Interest in the Project	Stakeholders Identified	Anticipated Engagement during Operations Phase
the people or groups who they represent. Their interests / issues will be similarly to those of local authorities in the above row.	<p>Management Board of Vize Kiyikoy 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>Thereafter, it is anticipated that engagement will occur on a quarterly basis at least to keep them informed about Project activities and respond to any issues that might arise.</p>
Businesses and Business Associations		
<p>Local businesses will be interested in procurement opportunities related to the provision of goods and services to the Project. They may also be interested in whether workers will continue to use local services, which would provide an economic benefit.</p> <p>Conversely, businesses may be concerned about potential impacts on business revenues, particularly in relation to the tourism sector. Businesses may also be concerned about a fall in revenue during the transition to full Operations due to a decrease in the demand of local services and spend from the Project workforce.</p>	<p>Vize Kiyikoy Tourism Association</p> <p>Local accommodation providers, including camp operators</p> <p>Local shops, cafes and restaurants</p> <p>Employment Agency ISKUR, Thrace Development Agency and Chamber of Commerce of Vize District.</p>	<p>Until mid-2020, there will be ongoing engagement with local business in Kiyikoy who rely on tourism income to explain relevant activities related to operations, as well as to monitor potential impacts on tourism. Further measures to support the tourism industry in Kiyikoy will be taken into consideration. Local businesses will also be engaged to discuss the transition to full operations, given the expected decrease in Project demand for local services and workforce spend.</p> <p>Thereafter, local businesses will continue to have access to the Grievance Procedure, should any issues arise during operations. Relevant notifications and Project updates will be shared in consultation with the Vize Kiyikoy Tourism Association, Kiyikoy Municipality, and muhtars who can act as conduits to share the information more widely among tourism-sector operators.</p> <p>In addition to the above, engagement will continue in relation to local procurement and employment opportunities. The Project will conduct engagements to explain the procurement procedure, the types of opportunities that may arise, and how local residents and suppliers can apply for suitable positions.</p>

Interest in the Project	Stakeholders Identified	Anticipated Engagement during Operations Phase
General Public (including residents of, and visitors to, the Local Communities)		
<p>Residents will have general interests in whether there will be continued employment, procurement and community investments from the Project.</p> <p>They may also have general concerns about the safety and security of the Project, and perceived environmental impacts, or perceived impacts on tourism or fishing.</p>	<p>Residents of Kiyikoy,, including women and youth, and tourists / visitors</p> <p>Residents of surrounding settlements</p>	<p>The Information Centre in Kiyikoy will continue to operate until at least mid-2020, thereby enabling members of the general public to visit and receive feedback on the Project. Information materials will also be disseminated in the local community.</p> <p>Thereafter, members of the public can contact the Project by phone, email, or via the website. A dedicated focal point for community liaison will be assigned to respond to any questions or issues as they arise.</p> <p>Project updates and notifications will continue to be shared with local authorities and community representatives who will be used as proxies to disseminate to members of the public.</p> <p>Local notifications and announcements related to potential employment or procurement positions will also be notified through appropriate channels at local level, as they arise.</p> <p>Information materials about the Operations Phase will continue to be made available, and relevant information will continue to be hosted on the TurkStream website.</p>
Community Service and Infrastructure/Utilities Organisations, and Third Party Users		
<u>Community Service Providers</u>		
<p>Health providers will be interested in emergency response plans and workforce healthcare arrangements for the Receiving Terminal.</p> <p>Health providers and education services, may also be interested in whether there will be continued investments in these fields during operations.</p> <p>Kiyikoy health clinic and Kiyikoy schools may be interested to know whether there will be continued community investments in the field of health and education.</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>Healthcare providers will be engaged as part of the development of emergency response plans and will be informed about healthcare arrangements for the Project workforce.</p> <p>Other topics of interest will be discussed with these stakeholders as applicable.</p>

Interest in the Project	Stakeholders Identified	Anticipated Engagement during Operations Phase
<u>Infrastructure, Utilities and Third-Party Users</u>		
Community infrastructure/utility providers as well as third-party users will primarily be interested in connections to Project facilities, use and conditions of roads accessing the Receiving Terminal, and any potential interface related to simultaneous operations or emergency response during operations.	<p>BOTAS (TurkStream Onshore Section 1 operator), TAGTAS (TurkStream Onshore 2 operator)</p> <p>Borusan wind-farm (power generation), ISKI (Istanbul Water and Sewerage Administration), Directorate of Roads and Highways</p> <p>TREIAS (electricity connection), TREDAS (communication lines)</p>	These stakeholders will be engaged as part of the development of operational emergency response plans. For any third-party users of access roads, the Project will engage them with respect to the handback and or maintenance strategy of any Project roads. Simultaneous operations requiring interface will be managed on a technical level as required.
National and Regional Government Authorities		
<u>National Authorities</u>		
National authorities have an interest in 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 and government departments will be engaged as per Turkish regulations and on an ongoing basis and as needed basis on any further matters that arise in relation to the Project.
<u>Regional Authorities</u>		
<p>Regional authorities and public officials have a general interest in the potential impacts and benefits for their respective communities.</p> <p>Some regional institutions also have a role in permitting procedures.</p>	<p>Kirklareli Provincial Governorship and Tekirdag Provincial Governorship (and related institutions under their jurisdiction)</p> <p>Vize District sub-governorship and Saray District sub-</p>	Project updates and notifications will continue to be shared with regional institutions on an ongoing and as needed basis throughout the operations phase, including on any matters related to permits.

Interest in the Project	Stakeholders Identified	Anticipated Engagement during Operations Phase
	<p>governorship (and related institutions under their jurisdiction)</p> <p>Vize and Saray Municipality</p> <p>Public Officials including: Kirklareli Governor, Tekirdag Governor, Vize Sub-Governor, Saray Sub-Governor, Saray Mayor, Vize Mayor</p> <p>MPs from Kirklareli and Tekirdag Provinces.</p> <p>Regional agencies such as the Kirklareli Provincial Directorate of Culture and Tourism, Istanbul Regional Forestry Directorate, Vize Provincial Directorate of Forestry, etc.</p>	
Non-Governmental Organisations		
<p>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, Black Sea ecology, potential impacts on the local environment, or on local economic industries such as tourism and fisheries.</p>	<p>Local and regional NGOs interested in environmental protection and ecosystems such as Northern Forestry Defence Initiative, Thrace Platform</p>	<p>NGOs will have the opportunity to contact the Project during the operations phase to receive feedback to questions, queries or issues.</p> <p>Information about the Project will also be hosted on the TurkStream website.</p>
Academic and Research Organisations		
<p>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.</p>	<p>University faculties across Turkey with a focus on engineering, marine sciences, physical and ecological environment, and cultural heritage.</p>	<p>Academic and research organisations will have the opportunity to contact the Project during the operations phase to receive feedback to questions, queries or issues.</p> <p>Information about the Project will also be hosted on the TurkStream website.</p>

Interest in the Project	Stakeholders Identified	Anticipated Engagement during Operations Phase
Media		
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.	Turkish media at national, regional and local levels.	Engagement with the media will initially continue through press releases, announcements, interviews and press conferences, particularly during the first year of operations.
Local and regional media may have specific interests in reporting on matters of interest to the region or local communities.		The media will have the opportunity to contact the Project throughout the operations phase, and relevant project updates will be shared as required through press releases.

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).

Throughout the stakeholder engagement process during the Construction phase, the Project has considered the needs of all potentially interested stakeholders, including those for whom special care in consultation may be needed. 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.

During the transition into the Operations Phase, similar methods will be used to access vulnerable groups and share relevant Project information. As the Project moves into full Operations, the Project will primarily aim to have relevant information shared with vulnerable groups through community representatives, who will be expected to communicate updates to the wider community. Project information materials on operations will also be available in the community and on the TurkStream website. Information on how to contact the Company, including personnel appointed to manage ongoing community liaison, will also be made available in the community.

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.

During the construction phase, the stakeholder engagement process has included two-way targeted engagement related to specific potential Project impacts, for example traffic, impacts to fishing, and impacts to animal husbandry activities, as well as to assess the effectiveness of measures. 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.

Two-way targeted engagement activities will continue during the transition into operations around specific topics of interest and known concerns of stakeholders. In particular, this will be required for ongoing Project activities during the transition which may result in environmental or social impacts, such as demobilisation of the construction site and associated traffic-impacts, reinstatement activities, and works involved to maintain or handback Project access roads.

Once these activities are completed, the focus of engagement will shift to ensuring that relevant information about the Project is available in the community, that the ways in which to contact the Project are known and there are mechanisms to respond to stakeholder issues as they arise, and that Project updates and notifications are shared as the need arises.

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 Project 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.

Figure 3-2 Project Information Materials



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

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. 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 documents disclosed and engagement materials produced to date, and upcoming are listed in Table 3-3. Copies of the information 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 reports and documents disclosed	Stakeholder Engagement Plans Community Needs Assessment Non-Technical Summary Fishing Compensation Framework Document MRAG Fisheries Study Animal Husbandry Compensation Framework - 2019 Environmental and Social Overview Report
Additional reports and documents to be disclosed	Additional Environmental and Social documentation which may be required as part of the international financing process for the Project in 2020.
Supporting materials	<p>Project brochures (distributed at meetings and in communities)</p> <ul style="list-style-type: none"> Corporate brochure Kiyikoy Community brochure <p>Project leaflets (distributed at meetings and in communities)*</p> <ul style="list-style-type: none"> Feedback Process and Grievance Procedure leaflet Community Investment leaflet Community Investment booklet Factsheets on Construction, Operations, Environment, Social and Cultural Heritage topics <p>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</p> <p>*Note: leaflets and factsheets are updated to reflect new information as the Project progresses. A suite of new information materials covering explanatory information on the Operations Phase and relevant environmental and social aspects related to operations has been developed and disclosed in Q4 2019. See Appendix H for the full list of materials developed for the Project.</p>

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
Residents of local communities, including traffic-affected 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"> Email, telephone, post and in person Meetings with Project representatives if required
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
Local Government and Community Representatives	Hard copies of documents and materials distributed and made available in communities. Notifications and invitations to meet	Email, telephone, post and in person Public events Individual and group meetings

Stakeholder Category	Disclosure Methods	Communication Channels
	with South Stream Transport have also been addressed to specific stakeholders.	
Regional and National Government authorities	Notifications, key documents and invitations to meet have been addressed to specific stakeholders.	Email, telephone, post and in person Meetings and correspondence
Non-governmental organisations (NGOs)	Website Newspaper announcement	Email, telephone, post, in person
Community Service and Infrastructure/Utilities Organisations, and Third Party Users	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
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 research 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 during the Construction Phase (2018 – December 2019)

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 (CIP). Starting in Q4 2019, a number of engagement activities have also been performed to inform stakeholders about aspects of the Operations Phase of the Project.

The primary engagement activities undertaken during the Construction Phase are summarised below in Table 4-1, with a full list of meetings held in 2018 to September 2019 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 during Construction

Event / Activity	Date	Engagement
Relocation of beekeepers	January 2018 and ongoing	<p>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.</p> <p>At the end of 2018, engagement continued with beekeepers regarding their return to previous to their previous locations. This was on the basis that some beekeepers who were relocated, believed that their production had dropped due to the relocation. The Project agreed to assist their return relocation.</p> <p>In 2019, engagement with beekeepers has continued through the beekeeping development project undertaken as part of the Community Investment Programme.</p>
Completion of Community Needs Assessment and development of Community Investment programme for Construction	January – April 2018 and ongoing	<p>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.</p> <p>Meetings continued throughout the construction phase with relevant stakeholders and beneficiaries to design and implement the agreed Community Investment projects. An iterative process was followed whereby projects were changed or adapted in consultation with stakeholders, and/or new projects were identified and implemented.</p>

Event / Activity	Date	Engagement
		<p>In 2019, the CIP was expanded to include projects in the Traffic-Affected communities of Bahcekoy, Gungormez, and Komurkoy. Ongoing engagement has been held with the muhtars and representatives of these communities to identify and implement CIP projects.</p> <p>At the end of 2019, further meetings were organised with the purpose of identifying potential projects to implement in 2020.</p>
Notifications and coordination of onshore construction activities	February – March 2018 and continuing throughout construction	<p>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.</p> <p>Coordination with relevant community representatives and authorities has continued throughout construction as different construction activities are planned.</p>
Community disclosure of the Feedback Process and Grievance Procedure	March 2018	<p>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.</p> <p>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.</p>
Traffic management coordination with Traffic-Affected Communities	March 2018 - ongoing	<p>Meetings with authorities in Saray and community representatives in Bahcekoy, Gungormez and Komurkoy to receive feedback on construction traffic management, and to disclose and ensure accessibility of the Grievance Procedure.</p> <p>For Komurkoy, engagement started in early 2019, once it became apparent that the Kiyikoy-Vize transport route was being used by Project construction traffic.</p>
Socio-economic monitoring meetings	Starting March 2018 and every Quarter	<p>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.</p>
Development and implementation of Kiyikoy Animal Husbandry mitigations	Starting March – April 2018, and continuing throughout construction	<p>Starting in March 2018, 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, including compensation, were finalised in agreement with animal owners in March and implementation started in April.</p>

Event / Activity	Date	Engagement
		<p>For animal husbandry enterprises located elsewhere in Kiyikoy, further engagements were held throughout 2018 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. At the end of 2018, compensation agreements with animal husbandry enterprises based in other locations n Kiyikoy were prepared and signed.</p> <p>Starting in 2019, further meetings were held with animal husbandry enterprises in Kiyikoy to inform them about expected Project construction and traffic impacts for the forthcoming year. A compensation framework was prepared and disclosed in early 2019 and compensation contracts were issued and signed with over 50 enterprises based on eligibility between May – August 2019.</p> <p>In mid-2019, a series of meetings were also held with animal husbandry enterprises, located close to Kiyikoy town, to discuss potential impacts and review their eligibility with respect to compensation.</p>
Disclosure of employment and procurement procedure	April 2018 December 2019	<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> <p>New announcements for available job positions for the Operations Phase of the Project started in December 2019.</p>
Hosting and supporting events, activities and visits	Starting April 2018 and periodically throughout construction	<p>Engagement has occurred with wider members through hosting or supporting events and activities in Kiyikoy, as well as arranging visits. This has included:</p> <ul style="list-style-type: none"> • Supporting 23 April Children’s Day celebrations in 2018 and 2019. • Hosting a community football tournament in spring 2018 and 2019. • Contributing towards the 1 July Cabotage festival in Kiyikoy, including the hosting of a dedicated children’s festival for the 2019 event. • Arranging visits with community representatives and delegates of local, district and regional authorities to the construction site and to the Pioneering Spirit construction vessel. • Supporting the opening of the Kiyikoy Cultural, Arts and Training Centre in October 2018 • Sponsoring and hosting a Children’s Photography Exhibition in Kiyikoy in October 2018 and November

Event / Activity	Date	Engagement
		<p>2019, and in Istanbul in December 2018 and November 2019.</p> <ul style="list-style-type: none"> • Organising community representatives and delegates of local, district and regional authorities to attend the Offshore Construction Completion Ceremony in Istanbul in November 2018. • Organising field trips to Amasra for Kiyikoy community members who participated in the tourism service trainings undertaken as part of the CIP. • Sponsoring a Kiyikoy community theatre performance in April 2019. • Beach clean-up event in Kiyikoy in May 2019. • Sponsoring a volleyball tournament in Kiyikoy in August 2019. • Participation in the Gungormez School opening event in October 2019. • Safe Driving Campaign Event in Kiyikoy in October 2019.
Fisheries compensation	<p>April – July 2018</p> <p>December 2018 – February 2019</p>	<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. 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> <p>Between December 2018 and February 2019, engagement was undertaken with vessel owners, crew and authorities to finalise the list of eligible crew members to receive crew share compensation. Agreements were concluded with over 500 crew members in Kiyikoy in February 2019.</p>
Notifications and coordination of nearshore construction, including shore-crossing of the beach	<p>June – December 2018</p> <p>February 2019</p>	<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</p>

Event / Activity	Date	Engagement
		<p>shared with the Kiyikoy Fishing Cooperative, including discussions on the coordination of activities where necessary to minimise disruption to fishing.</p> <p>Further notification meetings were held with fisheries in February 2019 regarding the above-water tie in of the pipelines in the nearshore area, and in October 2019 regarding the nearshore pipeline inspection survey</p>
Opening of Kiyikoy Information Centre	December 2018 and ongoing	<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 is open at least 2 days per week, and hosts materials with information about the Project. Project representatives are available to answer queries and share information with visitors during opening times.</p>
Perception Survey in Kiyikoy	January 2019	A survey was undertaken to understand local perceptions of the Project in 2019 for socio-economic and stakeholder monitoring purposes. The survey results were used to refine engagement planning for the remainder of 2019.
Introductory Meetings with New Community Representatives	April – June 2019	<p>Meetings were held with the newly elected Mayor and muhtars in Kiyikoy in April 2019 to introduce them to the Project and discuss any issues related to Project activities.</p> <p>Similarly meetings have been held with the new Fishing Cooperative Management Board who were appointed in June 2019.</p>
Notifications about Project commissioning and venting activities	October 2019	As part of Project commissioning, stakeholders in Kiyikoy were notified about venting of the pipelines due to the small potential that the noise associated with this activity may be heard.
Public Project Information Event in Kiyikoy	November 2019	<p>A public event was held in Kiyikoy in November 2019 to coincide with the transition from construction to operations.</p> <p>Similar to the Open Day event held in November 2017, information materials and presentations were made available at the event relating to both the construction and operation phases of the Project. Project representatives were present to provide information and answer questions.</p> <p>The event was organised at a weekend and entertainment for children and catering was hosted to encourage broad participation. The total attendance was approximately 300 persons.</p>
Engagement on Emergency Response and	December 2019 (will	Engagement has begun with stakeholders in Kiyikoy to present the Project's Emergency Response Plan for Operations in a

Event / Activity	Date	Engagement
Preparedness during the Operations Phase	continue into Q1 2020)	non-technical format. These meetings will continue into early 2020.
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), as well as notifications related to above-water tie-in of the pipelines in the nearshore in February 2019.

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 are 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, Gungormez and Komurkoy 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.

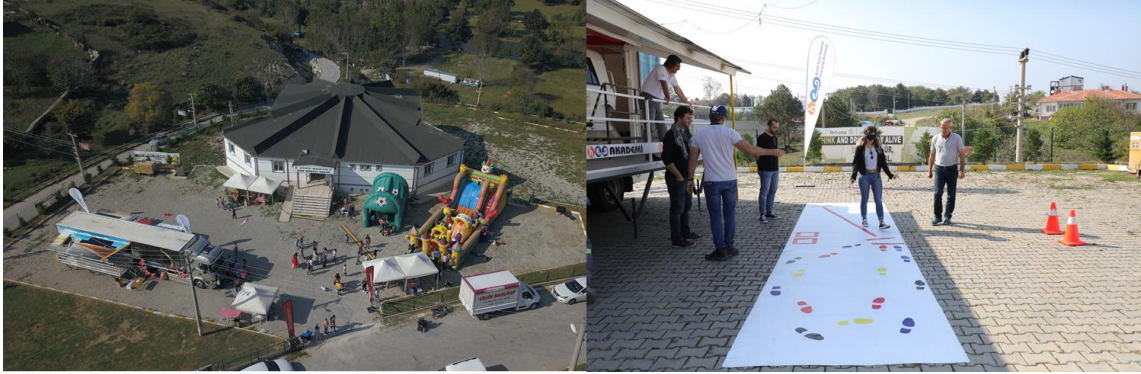
Monitoring has also been undertaken with representatives in Kiyikoy, Bahcekoy, Gungormez and Komurkoy, as well as access road households regarding traffic impacts.

Related to the above, the construction contractor Petrofac organised an event in Kiyikoy in October 2019 to promote safe driving. The event was open to the public and organised on a weekend to increase public participation. The event included demonstrations, simulators and

information materials, as well as handouts and giveaways to raise awareness about safe driving. In total, about 150 people from Kiyikoy attended the safe driving campaign.

In addition, an information meeting was undertaken in Komurkoy community to also raise awareness of safe driving.

Figure 4-2 Petrofac Safe Driving Campaign in Kiyikoy, October 2019



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.

Figure 4-3 Meeting with Kiyikoy Animal Herders



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.

Starting in early 2019, meetings were 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 focused on identifying potential measures to mitigate or minimise impacts that may arise in the forthcoming year. As a result of these discussions, a compensation framework was prepared and disclosed individually among animal husbandry enterprises in March – May 2019 which explained the expected impacts on animal husbandry, set forth the mechanism for compensation and eligibility criteria. Compensation contracts were issued and signed with over 50 enterprises based on their eligibility between May – August 2019.

In mid-2019, a series of meetings were also held with animal husbandry enterprises who are predominantly located close to Kiyikoy town. These enterprises were not eligible to receive compensation under the compensation framework on the basis that impacts on their livelihoods were assessed as being limited. The enterprises in question met with Project representatives to submit claims as to how they were being impacted by Project activities, on the basis that the Project would re-evaluate the compensation eligibility criteria. Based on the information received, and further evaluation, it was decided that there was not sufficient justification to revise the compensation framework. This decision, and the reasons for which, were disclosed during a meeting with Kiyikoy Municipality and representatives of this animal husbandry group in mid-2019, as well as being communicated individually among enterprises who had come forward with claims.

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">Crew membersLarge trawl vessel owners (Class A&B combined)Class C vessel ownersClass D vessel ownersDivers 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">Crew membersLarge trawl vessel owners (Class A&B combined)Class C vessel ownersClass D vessel ownersDivers 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	Group meeting(s) with: <ul style="list-style-type: none"> • Large trawl vessel owners (Class A&B combined) • Class C vessel owners • Class D vessel owners • Divers Present the initial fishing compensation offer and eligibility criteria.	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 Kiyikoy Municipality Kiyikoy Muhtars Vize Governorship	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. The list of crew members and eligibility was then determined in consultation with representatives of the fishing community and relevant community representatives and authorities in January 2019. The final list of eligible crew members was announced and a contract signing period was organised in the Information Centre in Kiyikoy in February 2019.	December 2018 and February 2019

Further engagement occurred with vessel owners and the Kiyikoy Fishing Cooperative in late 2018 and early 2019 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. The crew list was finalised with the participation of the representatives of vessel owners, crew members, and relevant local authorities in February 2019 and compensation agreements were prepared and signed with over 500 crew members in this period.

Other engagement activities with fisheries in 2019 have mostly focused on delivery of agreed community investment projects and monitoring post-construction impacts on the nearshore environment. In early 2019, some concerns and grievances were raised by divers and small vessel owners about ongoing impacts in the nearshore area, from turbidity and impacts to the local habitat as a result of dredging and backfilling. These concerns were evaluated as part of a nearshore post-construction survey campaign conducted in April 2019, as well as the experts who had prepared the initial fishing study.

The results from the April 2019 survey indicate that turbidity levels are lower compared to previous years. The ecosystem in the area closest to the pipelines has shown a healthy recovery since the end of nearshore construction and experts have concluded that the nearshore area is “Good” to “Very Good” according to biodiversity quality indexes. As part of this assessment, during engagement with fishermen in September 2019, they also reported that there was no noticeable change in fish populations in the area and fishing was continuing as normal.

4.2 Engagements related to the transition to Full Operations, Q4 2019

Commercial operation of the Project will begin at the end of 2019 with the delivery of natural gas from Russia to the Turkish and European markets. A number of commissioning activities have been undertaken to prepare the pipelines and the Receiving Terminal in Turkey for the delivery of natural gas by the end of the year. Stakeholders have been engaged on relevant aspects of these commissioning activities.

Moreover, the Project has sought to widely share information relevant to the operations phase within Local Communities, as well as to highlight particular accomplishments of the Project during the construction phase. Whilst this process started at the end of 2019, it will continue into early 2020 (further information can be found in Section 5).

4.2.1 Survey and Commissioning Notifications

A pipeline inspection survey was undertaken in October 2019 which entered the nearshore fishing grounds of Kiyikoy. Information about the survey campaign was shared with Kiyikoy Fishing Cooperative and notifications distributed among Kiyikoy fishermen in advance to ensure sufficient coordination of the activity and minimise the risk of interactions during the survey in the nearshore.

Related to the above, the pipeline inspection survey uncovered evidence of bottom trawling activities near the pipelines on the seabed. Due to the risk of damage to fishing gear and the potential safety risks associated with gear becoming trapped in the pipelines, the Project engaged fishermen in Igneada and Kiyikoy in one-to-one and small group meetings to inform them about the risk of bottom trawling near the pipelines. Information was also shared with the Igneada Port Authority for further dissemination to other fishing cooperatives operating in the region.

As part of Project commissioning, planned venting of the pipelines occurred in October 2019. The venting involved natural gas being introduced from Russia to fill the pipeline up to the Receiving Terminal in Turkey, with nitrogen being vented from the ventilation stacks in the Receiving Terminal. The venting activity could potentially be heard from receptors nearby the Receiving Terminal, although it was not expected it could be heard from the town itself. Nevertheless, the Project communicated this activity in advance to Kiyikoy community representatives and other stakeholders undertaking activities nearby (such as herding and beekeeping) in order to reduce the risk of concerns. The notification was done via meetings and phone calls and explained::

- the commissioning and venting process;
- the expected noise and air quality impacts associated with venting; and
- Explaining how this process will differ from routine Operations Phase activities.

4.2.2 Public Information Event in Kiyikoy

Similar to the Open Day event held in November 2017, the Project arranged a public information event at the wedding hall in Kiyikoy on 23 November 2019 to coincide with the transition from construction to operations. Information materials, posters and video presentations were made available at the event, and Project representatives were present to provide information and answer questions.

The event was organised on a weekend and 'festive' activities for children and catering was provided to encourage as much participation as possible.

The event disclosed information on a range of topics which may be of interest to stakeholders, including:

- Onshore construction activities that have been completed;
- Upcoming activities during the transition to full operations, including reinstatement;
- Technical aspects of the Operations Phase;
- Onshore environmental measures and mitigations which have been undertaken during construction, methods and results of environmental monitoring, and expected environmental impacts during operations;
- Nearshore construction activities, the results of nearshore monitoring and expected impacts on the nearshore environment and fisheries during operations;
- Cultural heritage findings and management during construction;
- Socio-economic mitigation measures undertaken during construction, including tourism, fisheries, animal husbandry, beekeeping, as well as the results of socio-economic monitoring, and expected socio-economic impacts during the transition and during full operations;
- Stakeholder engagement activities during construction, and anticipated engagement programme during the transition and during full operations;
- Local economic, employment and procurement information during the construction phase, and expected employment and procurement practices and local benefits during operations; and
- Community Investment Programme delivered during construction and anticipated approach during operations.

Comment forms were placed at the entrance of the event, and a stakeholder 'exit' survey was performed in order to capture feedback from attendees about the event and the Project in general.

In total, about 300 people attended the event, including women, youth and children. The event provided a very relaxed setting and stakeholders were generally positive about the informational materials available and the chance to speak to Project representatives. There were a number of positive comments received about the Project's stakeholder engagement and community investment programmes and some positive feedback about management of impacts. There were few noteworthy concerns related to the construction phase of the Project.

For the operational phase, stakeholders were mainly interested in the safety aspects of the Receiving terminal, whether employment opportunities would be available, whether the Project would continue to invest in the community, and whether the pipelines would have any effect on fish. In terms of concerns, fishermen raised a few concerns about the lighting of the Receiving Terminal and risk of gear being damaged by the pipelines.

Figure 4-4 Kiyikoy Public Information Event, 23 November 2019



4.2.3 Engagement on Emergency Response and Preparedness

The Project has prepared an Emergency Response and Preparedness Plan for the Operations Phase. The plan includes: various emergency risk scenarios which assess the likelihood and significance of these unplanned emergencies; the measures that will be taken to minimise the risk of any an emergency occurring; and measures to respond to and address an emergency, including community notification and coordination with Turkish emergency services and local authorities.

Based on the emergencies scenarios and risk assessments, it is not anticipated that there will be any emergencies will have significant offsite impacts, i.e. beyond the boundaries of the Receiving Terminal, given the safety systems in place. Nevertheless, the impacts and contingency planning in case of emergencies are a known area of interest among stakeholders. As such, the Project has begun meeting stakeholders to present the emergency response plan in a non-technical format and agree on the appropriate level of notifications and coordination among relevant parties, including how to notify the public where necessary.

Meetings have already been undertaken with Kiyikoy Municipality and Kiyikoy Gendarme in November 2019, and further meetings will be planned as appropriate in the coming months.

4.3 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 in 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, Bahcekoy and Komurkoy;
- 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 providers and camps, restaurants, and 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.

4.4 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 construction, between January 2018 and December 2019, 83 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 82 grievances received, 80 have been closed, and 2 remain open at the time of writing.

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

4.5 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. 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.

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.

At the end of 2018 and start of 2019, further meetings were held with stakeholders in Kiyikoy as well as the Traffic-Affected Communities of Gungormez and Bahcekoy to discuss and agree on additional community investment initiatives that were undertaken in 2019.

A further set of one-to-one and focus-group meetings were undertaken in late 2019 to receive feedback from people involved in community investment initiatives to date, as well as to identify potential investment areas and projects for the Community Investment Programme in 2020.

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 4-6 to 4-8.

Table 4-3 Summary of Community Investment Programme between 2018 – September 2019

Investment Area	Project	Description	Current Status of Project
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 Q4 2019.
	Renovation of shore-pulley system	Upgrade the shore-pulley system in Kiyikoy to enable it to bring small vessels to shore. The system will aid the maintenance of small vessels, result in local employment, and reduce maintenance costs for fishermen.	In development in conjunction with relevant authorities and Kiyikoy Fishing Cooperative.
	Installation of crane pulley system in Kiyikoy port	The system will enable large vessels to come to shore for maintenance, result in local employment, and reduce maintenance costs for fishermen.	In development. To be completed by Q1 2020.
Economic Development - Tourism	Improve amenities and facilities on Kiyikoy beaches	Landscaping of the Municipal Beach in Kiyikoy and installation of new beach paths, shelters and facilities (such as market stalls) to improve the conditions for tourism and leisure.	In development with relevant authorities. To be completed for Spring season, 2020.
	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 were completed in August 2019, in two separate phases with different groups. 85 participants attending the trainings.

Investment Area	Project	Description	Current Status of Project
	Hygiene Training Workshop	Delivered to hotels, pensions, restaurants and camp operators to improve awareness of hygiene in tourism-service facilities	Completed in December 2019. A total of 81 participants attended.
	Marketing/promotional support for Kiyikoy tourism industry	Development of Kiyikoy tourism website, tourism brochures and signage to promote the local tourism industry.	Development of tourism website was completed and social media promotions was completed in August 2019. Tourism signboards and brochures will be completed in October 2019.
	Vize Tourism Information Centre	Refurbishment of historic building in Vize for conversion into a Tourism Information Centre. The facility will include a café and accommodation. The tourism information centre itself will host information on tourism in the region and offer guided tours to sites, including to Kiyikoy.	In development. To be completed by Q1 2020
	Kiyikoy Tourism Sign	Design and installation of a town signboard at the entrance of Kiyikoy.	Completed July 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 addition, beekeepers will be assisted to procure new materials and upgrade their hives via small assistance grants.	Technical assistance trainings started in spring 2019 and will continue for 6 months. 16 participants attended the trainings. Applications and acceptance of small assistance grants were confirmed at the end of September 2019.

Investment Area	Project	Description	Current Status of Project
	Donation of feed grinder machine in Kiyikoy	The feed grinder machine will support animal husbandry enterprises to produce feed for livestock, and reduce costs associated with travelling longer distances to do so.	Completed December 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 hygiene, packaging, presenting, advertising and marketing of local food products.	<p>Trainings started in November 2018 and were completed in July 2019, in two separate phases. 63 participants attending the trainings.</p> <p>As a result of the trainings, interested women who participated are being supported to develop Kiyikoy branded soaps as a start-up business initiative.</p>
Economic Development – Small and Medium Enterprises	Supporting small business development in Kiyikoy	Technical assistance trainings and small grants programme for enterprises and associations	<p>Trainings were delivered in July 2019, with 28 organisations and enterprises attending.</p> <p>Applications and acceptance of small assistance grants were confirmed at the end of September 2019.</p>
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.	<p>Donation of library books to Kiyikoy High School, and school uniforms donated to every student in Kiyikoy in 2018.</p> <p>Refurbishments and classroom donations planned were completed in January 2019.</p>
	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.	Completed in August 2019. The facility will become operational by the end of 2019.

Investment Area	Project	Description	Current Status of Project
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.	Completed in June 2019.
	Install roof for Kiyikoy football pitch	Install a covered roof over Kiyikoy football pitch to make it suitable for use during winter.	Completed in November 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 September 2018. Running of the centre will continue until end of 2019.
	Improving conditions of playgrounds	Donation of new equipment for 2 playgrounds in Kiyikoy.	Completed in August 2018
Social Development, Community Events and Activities	Arts and crafts courses for children, youth and women	<p>Running and supporting small-scale community courses in music, arts and crafts, and other practical courses in Kiyikoy to promote local skills development:</p> <ul style="list-style-type: none"> Guitar courses for youth Clarinet trainings for youth and Roma Photography workshops for students and adults Chess masterclass workshop and competition Soap-making masterclass workshop 	<p>Guitar trainings for 6 months delivered to over 30 students, completed in June 2019.</p> <p>Guitar trainings for 6 months delivered to over 30 students over two phases, completed in June 2019.</p> <p>Clarinet trainings for 3 months delivered to over 20 students over two phases, completed in June 2019</p> <p>Photography workshops for 3 months delivered to over 40 students over two phases, completed in August 2019.</p> <p>Chess workshop and competition for youth completed in July 2019.</p>

Investment Area	Project	Description	Current Status of Project
		<ul style="list-style-type: none"> Chocolate-making workshop CV training workshop for university graduates 	<p>CV training workshop delivered to 15 students completed in December 2018.</p> <p>Soap-making workshop delivered to 27 women, completed in May 2019.</p> <p>Chocolate making workshop delivered to 51 women, completed in April 2019.</p>
	Support for Roma Association	Contributions made to set up an office for the Roma Association and assist the local Roma dance group	Contributions completed in 2018. Support for the dance group is ongoing throughout 2019.
	Support for disabled persons	Donations of equipment to disabled persons (e.g. motorized wheelchairs, orthopedic beds, etc.).	Donations of equipment to 12 persons will be completed in October 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	<p>Sponsored Children's Day performances in Kiyikoy in April 2018 and April 2019.</p> <p>Contribution's made to Kiyikoy high school marching band for Republic Day on 29th October 2019.</p> <p>Organisation of local Kiyikoy Football Tournament for adult teams in April – May 2018 and 2019.</p> <p>Support and contributions for 1st July Cabotage festival in Kiyikoy in 2018 and 2019, including hosting a dedicated event for children in 2019.</p>

Investment Area	Project	Description	Current Status of Project
			Kiyikoy community theatre performance organised in May 2019 with over 300 people attending.
			Volleyball tournament in Kiyikoy with 22 teams and community spectators completed in August 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.	<p>Trainings with students, enterprises, women, and fishermen completed between December 2018 – April 2019, with 66 people attending.</p> <p>A voluntary beach clean-up initiative was undertaken in Kiyikoy Municipal Beach in May 2019 with over 70 community members attending.</p>
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, with over 17,000 m ² of local road network improved by October 2018.
	Kiyikoy Port bridge reconstruction	Reconstruct the bridge adjacent to Kiyikoy port, used to access the port beach.	Completed in July 2019.
	Improve local water supply in Kiyikoy	New water well drilled to connect to the municipal water supply system, in order to enhance flow and quantity of local potable supply.	Completed in July 2019.

Investment Area	Project	Description	Current Status of Project
Traffic-Affected Local Communities	Health clinic improvement in Bahcekoy	Interior refurbishment of health clinic, and adjacent muhtars office	Completed in September 2019
	Road improvement in Bahcekoy	Resurfacing 800m of a side road in Bahcekoy in which connect to approximately 40 households	Completed in September 2019
	Health Clinic improvement in Gungormez	Insulation of building, roof repair and new outside fencing	Completed in December 2019
	School improvement in Gungormez	Conversion of empty building into community kindergarten, and establishment of a computer programming classroom	Kindergarten renovation completed in September 2019. Computer classroom will be completed in October 2019.
	Gungormez Wedding Hall improvement Refurbishment	Interior refurbishment and repairs to community wedding hall	Completed in September 2019
	Komurkoy community improvement	Installation of solar powered water pump to reduce costs of electrical powered system	In development with relevant local authorities. To be completed in Q1 2020.

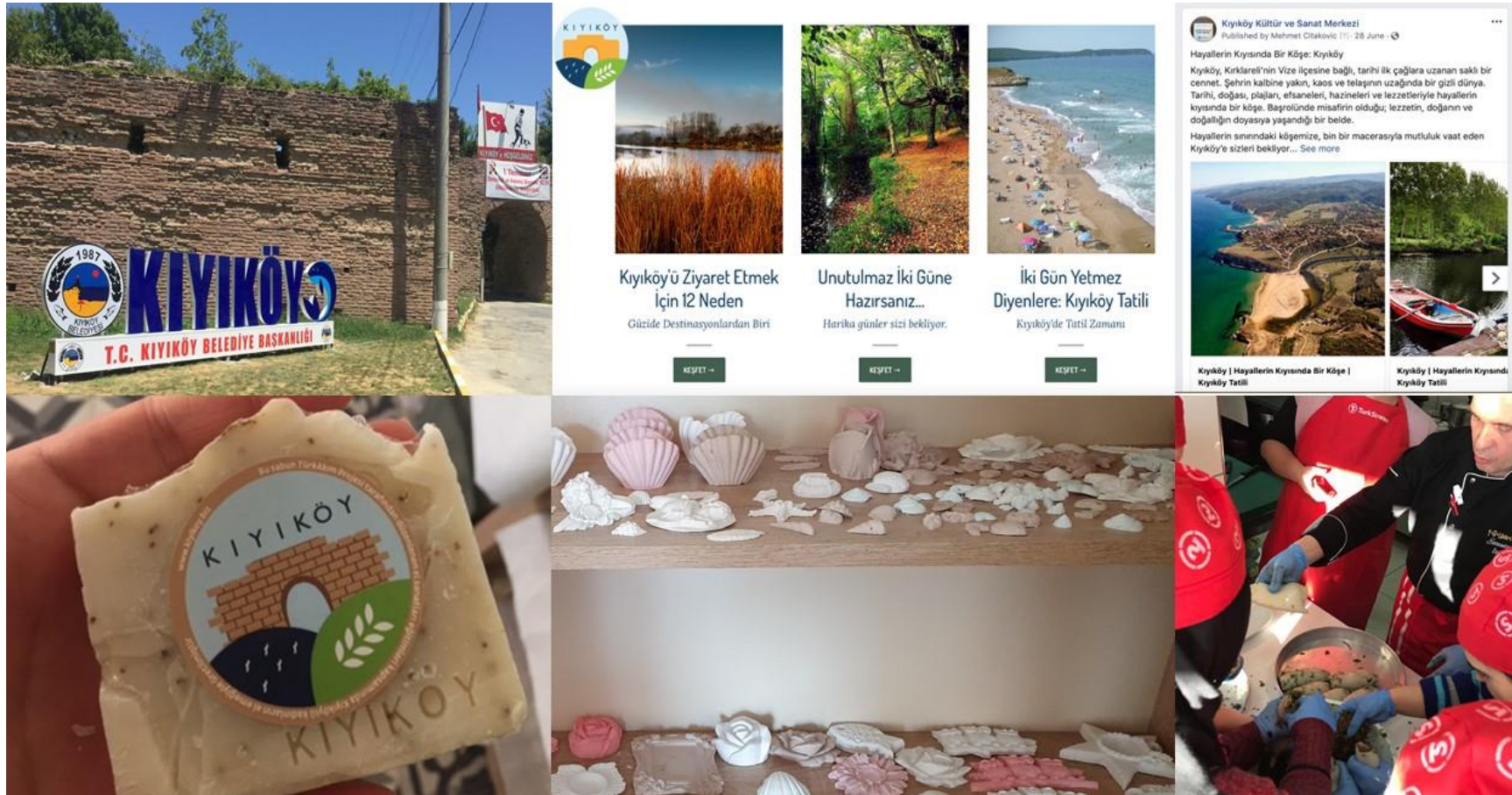
Figure 4-5 Facilities and Infrastructure Investments in Kiyikoy delivered as part of the Community Investment Programme



Top left to right: Kiyikoy football pitch and sports complex; New Kiyikoy health clinic and emergency service building; refurbished classroom in Kiyikoy and new school desks.

Bottom left to right: Reconstructed Kiyikoy Port Bridge; Kiyikoy Port cold storage facility for fishermen; refurbished changing rooms in Kiyikoy Municipal Beach.

Figure 4-6 Investments in Kiyikoy Tourism and Local Production



Top left to right: New Kiyikoy signboard located at town main gate; Kiyikoy tourism website page; Kiyikoy tourism promotional advertisement on Instagram.

Bottom left to right: Soap product with Kiyikoy branding made by local women; handicrafts produced by women; culinary masterclass delivered as part of tourism service capacity training programme.

Figure 4-7 Investments in Environmental Awareness Raising and Community Arts and Culture



Top left to right: Beach clean-up initiative in Kiyikoy; guitar course students; photography workshop students.

Bottom left to right: chocolate making workshop; chess workshop; theatre performance organised for children and adults in the Kiyikoy football pitch.

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

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, the 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.

Moreover, 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. Participation in training programmes has generally been high, and in some cases merited the creation of additional training groups and extension of the training programmes themselves to meet high demand. The trainings have served as another means by which stakeholders have accessibility to Project representatives and can receive information about the Project. An illustration of this is given in Table 4-4 which shows the overall number of participants in training components of the CIP.

Table 4-4 Number of Participants attending CIP Training and Skills Development Programmes

Training	Crafts	Guitar	Clarinet	Tourism-1	Tourism-2	Hygiene Trainings	Environment (Students)	Environment (women and enterprises)	Environment (Fishing)	Chocolate workshop	Soap-making	Photography	Beekeeping	Project management training	Chess Training	CV Training	TOTAL
Women:	63	12	2	29	16	49	15	15	0	51	27	23	1	2	18	7	330
Men:	0	18	8	19	6	32	15	8	15	0	0	17	21	16	14	8	197
Total:	63	30	10	48	22	81	30	23	15	51	27	40	22	18	32	15	527

4.6 Regular Community Liaison and Relationship-Building

4.6.1 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.

4.6.2 Kiyikoy Information Centre

The TurkStream Information Centre opened in Kiyikoy in December 2018. 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.

Figure 4-8 TurkStream Information Centre in Kiyikoy



Residents can visit the Information Centre to find out more information about the Project, ask questions and provide comments or lodge grievances. The information centre hosts a number of 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. It is also opened on other occasions, to accommodate certain engagement activities; for example the registration and contract signing process for fishing crew compensation.

The number of visitors to the Information Centre has ranged from approximately 40-50 per week in the first few months since its opening, to approximately 10-20 per week in Q3 2019.

4.6.3 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.

Such events and activities have included:

- Organising an exhibition of children's photographs in Kiyikoy Ataturk Park in October 2018. The photographs were taken as part of 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. A follow up exhibit was undertaken in Kiyikoy in November 2019 for students who participated in the 2019 photography workshops. In addition, the exhibit was launched in Istanbul Taksim metro station for one week in November 2019, with postcards of the photographs distributed.
- Sponsoring a local football tournament in Kiyikoy, involving teams of residents in April – May 2018 and 2019. A TurkStream Project team participated in the 2018 tournament.
- Sponsoring a volleyball tournament in Kiyikoy in August 2018, with 16 competing teams from Turkey, and 6 teams from Kiyikoy.
- 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 and 2019, the Cabotage Festival in July 2018 and 2019, including the organisation of a dedicated children's festival in 2019, Bayram celebrations in 2018 and 2019, 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 4-9 Events and Activities Sponsored by the Project



*Top left to right: Children's Photography Exhibition in Kiyikoy; Kiyikoy football tournament.
Middle left to right: Children's event hosted during Cabotage festival in 2019; Kiyikoy volleyball tournament.
Bottom left to right: Kiyikoy Photography Exhibition in Istanbul Taksim Metro; Site Visit by Turkish Minister of Energy and Natural Resources to the Receiving Terminal*

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 have included a visit to the Pioneering Spirit Offshore Pipe-laying vessel in October 2018 and a visit to the Receiving Terminal by the Turkish Minister of Energy and Natural Resources in November 2019.

As part of the Offshore Pipe-laying 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.

4.7 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.

Since 2017, the Project has organised energy expert round table discussions, and Project representatives have been present at relevant conferences in Turkey.

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 4-8).

Media engagements in 2019 have included organising visits with journalists to the comparable gas infrastructure of Nord Stream I and II in Germany, a site visit by Turkish main newswire Anadolu Agency to the Project's Receiving Terminal in Kiyikoy, as well as a site visit by groups of journalists in December 2019. Jointly with Gazprom and Uniper, the Blue Corridor Rally expert round table and kick-off ceremony was organized in Istanbul for the first time.

Figure 4-10 Media Conference on Environmental and Social topics



5 Planned Engagements during Operations, 2020 and beyond

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 throughout the Operations Phase of the Project.

Due to the changing nature of Project activities, the type and level of engagement during the Operational Phase will be more limited in scope than the Construction and Pre-Commissioning Phase. Planned engagement activities will be commensurate with the potential impacts of these Project activities during operations.

5.1 Project Activities during Transition and Full Operations

From January 2020 until about mid-2020, the Project will transition from the Construction Phase to the full Operations Phase. During this time, the following Project activities will occur:

- Demobilisation of personnel, machinery and equipment from the existing construction site, with associated traffic movements;
- Reinstatement activities around the Receiving Terminal and of temporary construction areas, including the temporary laydown (storage) area, the workers accommodation camp, and topsoil storage area; and
- Maintenance activities along Project access roads, and handback of roads to the Forestry activities.

The above activities have the potential to result in environmental and social impacts, particularly on livelihood activities performed close to the Project area, and on receptors based along Project transport routes due to potential traffic impacts. As such, associated mitigation and management measures to minimise impacts, including engagement activities, will be ongoing throughout this period.

During this transition period, engagement will also focus on ensuring that local communities are informed about Operational Phase activities, anticipated or potential impacts during operations, and the Project's commitment to mitigate and manage these impacts. Engagement will also aim to respond to any issues or concerns about Project operations.

Beyond the transition period, circa mid-2020, most of the activities associated with the full Operations Phase are routine and will occur within the fenced boundaries of the Receiving Terminal. Offsite activities will mainly be limited to occasional maintenance activities on Project pipeline right of way and along access roads to site. Therefore, Operations Phase activities are not expected to have significant adverse impacts on the environment, local communities or on economic livelihoods.

Given the above, the level of engagement activities at community level during full Operations will be scaled down accordingly. The engagement foreseen during this period will focus on:

- Maintaining regular liaison with community representatives;
- Providing notifications and updates as required;
- Ensuring that relevant information about the Project is available and accessible;
- Ensuring that stakeholders have a means of contacting the Project;
- Ensuring that there are appropriate procedures in place to manage incoming requests, questions or grievances, as well as to identify and address potential issues or impacts that may arise.

An overview of the planned engagements during the transition phase is discussed in Section 5.2. An outline of the planned engagement approach during full operations beyond mid-2020 is discussed in Section 5.3.

The following sections will not discuss engagement with regulatory authorities on matters of permitting and compliance with national requirements, including environmental reporting, as these will be performed in accordance with Turkish regulatory requirements and will be ongoing throughout the transition phase and full Operations Phase as required.

5.2 Summary of Upcoming Engagement Activities in Turkey during the Operational Transition Period, up to mid-2020

An overview of the anticipated engagement activities during the transition to full Operations is outlined in Table 5.1, with more explanation provided about the engagement approach in following sections.

Table 5-1 Anticipated Timing of Planned Stakeholder Engagement Activities

Planned Engagement Activity	Anticipated Date
Notifications and ceremony for start of Commercial Operations (First Gas)	End December 2019
Engagement with local stakeholders and authorities on Emergency Response Planning	Q1 2020
Community Investment Programme Feedback Assessment	Q1 2020
Meetings to identify and develop Community Investment projects to be implemented during 2020.	Q1 2020
Socio-economic monitoring meetings	Q1 2020 2020 – timing to be confirmed.

Planned Engagement Activity	Anticipated Date
Engagements with targeted stakeholders regarding the conclusion activities of construction activities, and expected activities/impacts during the transition and full operational phases	Q1 2020
Disclosure of expected local employment and procurement procedures during Operations	Q1 2020
Engagement on local biodiversity	Q1 2020
Disclosure of additional Environmental and Social documents as part of the Project's international financing process	Q1 – Q2 2020
Local notification meetings on how to contact the Company during full operations.	Q2 – Q3 2020

5.2.1 Project Notifications regarding the start of Commercial Operations

There will be notifications and announcements, including press releases, regarding the start of commercial operations at the end of 2020. It is anticipated that a ceremony will be staged for this event in January 2020.

Further notifications during the transition will be issued as required.

5.2.2 Engagement on Emergency Response and Preparedness

Engagement of the Project's Emergency Response and Preparedness Plan for the Operations Phase began in November 2019 (see Section 4.2.3). It is foreseen that further engagements will occur in early 2020 with the following stakeholders:

- Vize Governorship;
- Kiyikoy and Vize Forestry Directorates;
- Muhtars and local heads of cooperatives and associations, such as forestry, fishing, tourism and animal husbandry representatives;
- Emergency services.

5.2.3 Targeted Engagement on Operations Transition and Full Operations

A series of targeted one-on-one meetings and group meetings will be organised to inform stakeholders about expected Project activities during the transition to operations and explain relevant aspects of full operations.

These meetings will also serve to inform stakeholders about any expected impacts during these phases as well as mitigation and management measures that will be in place, receive feedback

to be considered in planning, as well as answer questions or respond to any concerns that may arise.

In general, the types of information that will be disclosed will be similar to the topics covered during the Public Information Event conducted in November 2019 in Kiyikoy (see Section 4.2.3). However, the discussions will focus on issues that are most likely to be of interest or relevance to specific stakeholders groups (these are outlined in Section 3.2).

The stakeholders that will be targeted will include:

- Kiyikoy Municipality and Community Representatives (including muhtars and heads of local associations and cooperatives);
- Vize Kiyikoy Tourism Association, and small enterprises in Kiyikoy (accommodation providers, restaurants, cafes, camp operators);
- Kiyikoy Fishing Cooperative and fishing groups;
- Kiyikoy Agricultural (Forestry) Cooperative and forestry workers;
- Kiyikoy Animal Husbandry enterprises;
- Kiyikoy beekeepers;
- Kiyikoy women;
- Kiyikoy youth;
- Kiyikoy Roma Association and members;
- Representatives of Bahcekoy, Gungormez and Komurkoy (specifically on traffic-related issues during demobilisation and spoil disposal).

5.2.4 Socio-economic Monitoring

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

Meetings will be planned in Q1 2020 to inform the Annual Environmental and Social Monitoring Report for 2019. A further set of engagements will occur in 2020 to monitor impacts during operations. It is anticipated that the scope of socio-economic monitoring during the Operations Phase will primarily focus on livelihood sectors, such as tourism, fishing, animal husbandry and forestry.

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. Relevant findings from the 2019 Environmental and Social Monitoring Report will be shared with interested stakeholders in 2020.

5.2.5 Community Investment Programme

The Project's Community Investment Programme will continue into the Operations Phase, albeit the scope of the programme will be more limited and targeted when compared to the programme delivered during the Construction Phase.

One-to-one and focus group meetings have already organised with stakeholders in Kiyikoy in late 2019 to discuss potential community investment initiatives to be undertaken in 2020.

Further meetings will be scheduled in early 2020 to: inform community members about the scope of the CIP as the Project transitions into full Operations and the projects that will be implemented in 2020; progress initiatives already approved under the 2018-2019 CIP, but have yet to be implemented; discuss exit strategies and sustainability of CIP projects delivered under the 2018-2019 CIP.

In addition, an assessment will be performed involving dialogue with CIP project beneficiaries and CIP partners to evaluate the outcomes of CIP initiatives undertaken as part of the 2018-2019 CIP.

5.2.6 Disclosure of Employment and Procurement Procedures during Operations

The Project will contract service providers for the Operations Phase, to deliver services such maintenance, catering, cleaning, transport, security, accommodation for the Receiving Terminal and its workforce. These service providers will be encouraged to continue to procure goods and services at local level and hire local staff to fill suitable positions. Moreover, they will be required to ensure that suitable employment and procurement opportunities are advertised and made accessible at local level. A Local Content Plan will be developed to facilitate these arrangements, which will have an engagement aspect to make it suitable to the local context.

Once the Local Content Plan has been developed, engagement meetings will occur with stakeholders at local level to inform them about expected employment and procurement opportunities that will arise during the Operations Phase, how to access or apply for these opportunities, and the methods that these opportunities be informed or announced locally.

These meetings will be led by contracted service providers for the Operations Phase, who will be responsible for providing services.

5.2.7 Engagement on Local Biodiversity

The Project is developing a Biodiversity Action Plan (BAP) which, among other objectives, will seek to identify opportunities to protect and conserve biodiversity and improve conservation measures for certain species in the Project Area. It is intended that the BAP development process will involve engagement with a range of stakeholders (such as national, regional and local government, universities, NGOs and/or local ecologists, related to defining specific biodiversity actions and building potential partnerships with stakeholders.

5.2.8 Disclosure of Additional Environmental and Social Documentation

As part of the Project's international financing process, a disclosure programme will be planned in conjunction with the potential lenders. The programme will consist of disclosing Environmental and Social documentation and reports in accordance with the specific requirements of the potential lenders.

At the time of writing it is anticipated this will consist of disclosure on the websites of the potential lenders and the website of the Project, for a period of at least 30 days.

5.2.9 Handover notifications about contacting the Project during full Operations

It is anticipated that there will be a transition from the current Project team responsible for stakeholder and community engagement, to new focal point(s) in mid-2020. This will necessitate a handover of contacts to relevant stakeholders at local level to introduce the new team that will be responsible for community liaison during full Operations.

During this set of engagements, stakeholders will be informed about how to contact the Project during full Operations, and the anticipated level and type of engagement that is foreseen (refer to Section 5.3 below for further information). Stakeholders will also be reminded that the Grievance Procedure can still be utilised should they have any specific issues or complaints during the full Operations Phase.

Up until this handover phase, ongoing community liaison will continue as normal, and the Information Point will remain open to stakeholders.

5.2.10 Other Supporting Activities

Throughout the transition phase, ongoing community liaison will continue as normal utilising Company's existing stakeholder engagement team (see Section 6 for more details). The Information Point will remain open to stakeholders until at least mid-2020.

Information materials will be hosted in the Information Centre, distributed in the community as applicable, as well as made available on the Company website.

5.3 Anticipated Engagement during Full Operations, mid-2020 and beyond

As described in Section 5.1 above, the level and types of engagement activities will scale down as the Project enters the full Operations Phase, as no significant Project impacts are foreseen on local environment or social receptors. With this in mind, engagement will shift to be more reactive to issues from community members as they arise, combined with semi-regular update meetings with key stakeholders groups.

This section generally explains the types of engagement activities and methods that are foreseen during the Operations Phase.

5.3.1 Regular Update Meetings with Community Representatives

The Project will plan to meet with community representatives in Kiyikoy, and relevant local and regional government officials, on a regular basis, depending on the level of interest of these stakeholders.

The purpose of these meetings will be to share updates on the Project and receive feedback to be considered by the Project.

5.3.2 Feedback Process and Grievance Procedure

The Feedback Process and Grievance Procedure will continue to be used during the Operations Phase. This will be the primary mechanism to receive and respond to any issues or complaints which arise during the Operations Phase (further information about the Feedback Process and Grievance Procedure is contained in Section 7). This procedure will also cover receipt and response to any incoming requests for investments, donations or contributions under the Community Investment Programme as and when they arise.

In order to facilitate access to Project, information about how to contact the Company will be made available in the community of Kiyikoy and among relevant community representatives and local and regional government officials. This information will also be made available on the Company website.

The existing Feedback Process and Grievance Procedure leaflet will be updated with the new contact information and distributed locally in places which are accessible to community members, such as the Municipality, Arts, Culture and Training Centre and in teahouses. Additional copies will be distributed as needed.

5.3.3 Notifications during Operations

Notifications will be issued to stakeholders in Kiyikoy during Operations, as appropriate and when required, in advance of any planned activities which may cause concern or which may have the potential to cause temporary disruption.

The types of activities that will be notified include:

- Major venting releases;
- Emergency response and preparedness drills;
- Road maintenance works which may restrict access or require temporary road closures;
- Pipeline inspection surveys occurring in the nearshore;
- Deliveries involving outsized loads which may lead to temporarily restrict access.

These notifications will be issued to community representatives and local institutions, such as the Municipality, Forestry Directorate and Gendarme as applicable. Other stakeholders close to the proximity of any planned works, such as animal husbandry enterprises, will also be notified depending on the nature of the activity.

During such notifications, the Project will relay the information verbally to stakeholders and, if required, will agree on any further steps for wider communication in Kiyikoy, such as announcements through the Municipality speakers.

5.3.4 Other Supporting Activities

Information materials explaining aspects of the Operations Phase will be made available and distributed locally as appropriate. These information materials will also be given to stakeholders during meetings, or sent to stakeholders individually upon request in response to relevant questions.

Information about the Project, associated reports and information materials will continue to be hosted on the Project's website as appropriate, and updated where necessary.

Where necessary, Project updates or announcements will also continue to be shared via the media.

6 Roles and Responsibilities

6.1 Development, Construction and Operations Transition Phases

During the development and construction phases of the Project from 2015 to 2019, the Project's Stakeholder Engagement Team has been 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) works 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 also assists in the identification and resolution of issues or grievances that could arise from the Project.

StratejiCo, a community engagement consultant, has supported 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.

To date, 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).

The existing Stakeholder Engagement Team and resources identified above will continue to implement the Project's stakeholder engagement programme during the Project's transition from construction to full operations, until at least mid-2020.

6.2 Full Operations Phase

There will be a transition between the existing personnel and resources responsible for the stakeholder engagement programme to new personnel who will be responsible for the implementation of the stakeholder engagement programme during the full Operations Phase.

A focal point will be assigned with the responsibility for undertaking the engagement programme explained in Section 5.3, including management of the Feedback Process and Grievance Procedure and acting as the main focal point for community liaison. This focal point will also be responsible for the documenting, tracking, and reporting of stakeholder engagement activities, as well as ensuring other personnel working at the Receiving Terminal and at the branch are familiar with the Project's stakeholder engagement procedures.

Unlike the CLO, and in anticipation of the more limited engagement activities that are foreseen during full Operations, it is anticipated that the focal point's role will be combined with other duties, such as management of permits and/or environmental aspects. The handover of community liaison duties between the existing CLO and to be appointed focal point for community liaison is described in Section 5.2.13.

The focal point for community liaison will have reporting lines to the Chief Engineer of the Receiving Terminal and the Head of the Turkish Branch. These two roles will jointly have management oversight of the implementation of the stakeholder engagement programme during the full Operations Phase, including decision-making authority in the process of investigating and addressing any potential impacts or grievances that might arise during the full Operations Phase, and in terms of managing any incoming requests for community investment contributions. External contractors may also be used during the full Operations Phase to support stakeholder engagement activities at community and regional levels.

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, Sariyer, 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, Kiklarelili
Phone: +90 212 900 8325 / +90 549 460 9928

** Note: the Information Centre is expected to be operating until mid-2020.*

Or comments may be submitted by:

email to: feedback@turkstream.info
via website: <http://turkstream.info/about/feedback>

Once the Project transitions to full Operations, where applicable, new contact information will be shared via the website and stakeholders at local and regional levels will be informed accordingly.

7.1.1 Grievance Procedure 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

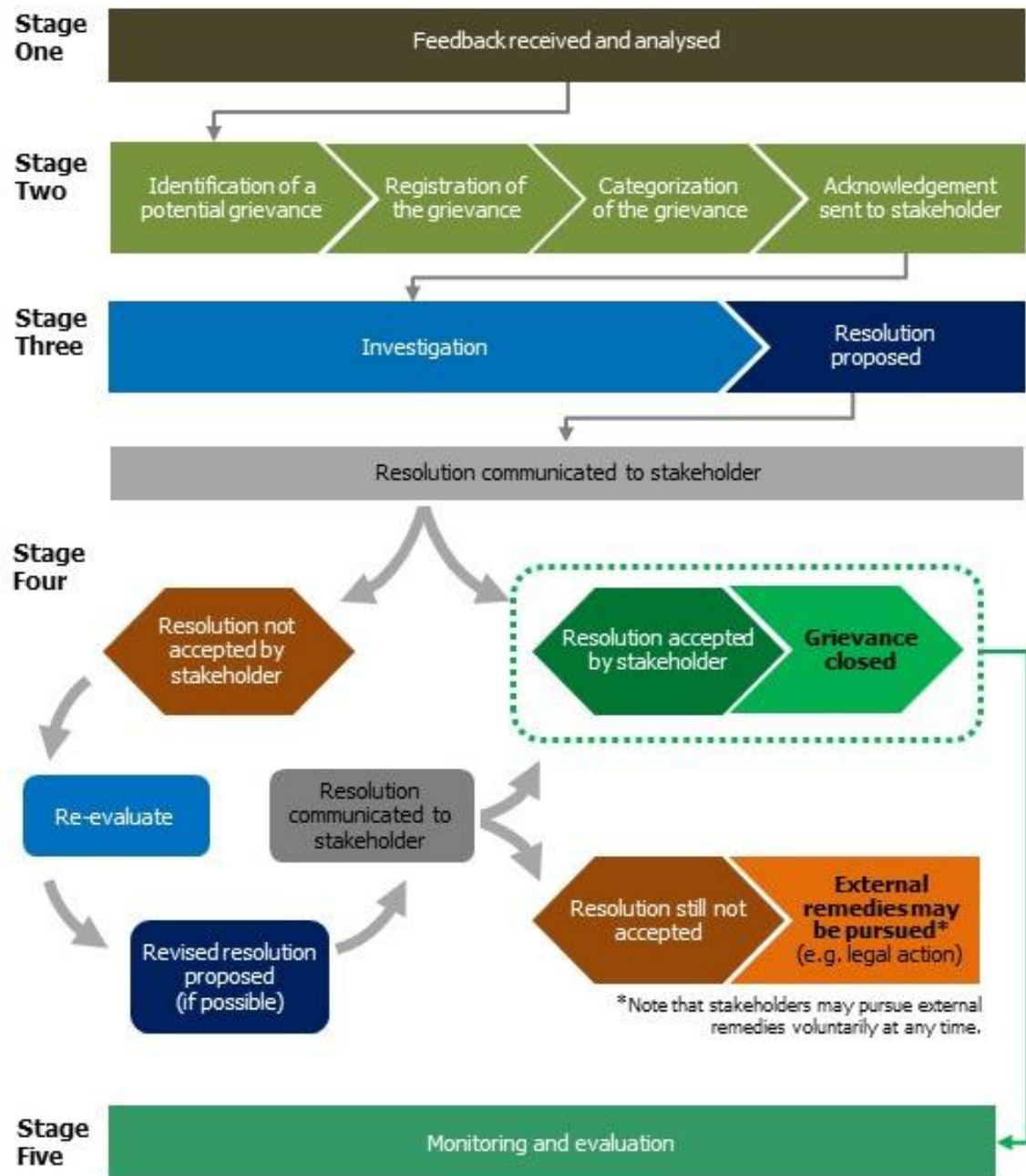
A summary of the process for identifying, investigating and resolving grievances is provided in Figure 7-1 below. The Grievance Procedure is published on the Project's website in a non-technical format and stakeholders have been notified through meetings and the distribution of a leaflet explaining the procedure.

Figure 7-1 Grievance Procedure Process

Stage	Description
Stage 1: Feedback received	<ul style="list-style-type: none"> 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. In some cases, this process may identify a grievance. If so, Stage 2 of the Grievance Procedure is initiated.
Stage 2: Grievance logged	<ul style="list-style-type: none"> When a grievance is identified, it is officially registered and given a unique identification number. It is categorised based on the type of complaint and its severity. 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.
Stage 3: Investigation and resolution	<ul style="list-style-type: none"> 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. 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.
Stage 4: Resolution accepted (or not accepted)	<ul style="list-style-type: none"> If the resolution is accepted by all parties, it is implemented and the grievance is closed. If the resolution is not accepted, it will be reconsidered and a revised resolution may be proposed. 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.
Stage 5: Monitoring & Evaluation	<ul style="list-style-type: none"> 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

Stage	Description
	has been implemented and will have the opportunity to provide feedback on the grievance process and its implementation.

Figure 7-2 Grievance Procedure Flowchart



7.1.3 Compensation Management and Livelihood Restoration Framework

Although the Project does not foresee potential impacts on livelihoods during the Operations Phase, the Compensation Management and Livelihood Restoration Framework will be used should any cases arise where livelihoods or property has potentially been affected and where compensation may be 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 has to date worked 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 has been managed through the Project's ESMP.

To date monitoring has included:

- 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.

Appropriate monitoring parameters during the full Operations phase will be developed in 2020.

8.2 Tracking Stakeholder Engagement Activities

Performance has been reviewed regularly against the Stakeholder Engagement Plan. Tracking of stakeholder engagement has been used to assess the effectiveness of the Project's stakeholder engagement activities. Indicators for tracking have included:

- materials disseminated: types, frequency, and location;
- numbers and types of grievances and the nature and timing of their resolution;
- qualitative evaluation of community attitudes and perceptions regarding stakeholder engagement performance based on stakeholder feedback;
- Number and types of engagement meetings held with stakeholders, including by category; and
- Number of public updates, events, notifications and announcements.

Parameters for tracking stakeholder engagement performance during the full Operations Phase will be developed in 2020.

8.3 Project Reporting

During the Operations 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.

Project updates, information materials, and relevant reports will be made available via the Project's website as required and appropriate.

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.

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