



Stakeholder Engagement Plan

TurkStream Gas Pipeline – Offshore Section

December 2017

Abbreviations

Abbreviation	Description
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
MoEU	Ministry of Environment and Urbanisation
NGO	Non-Governmental Organisation
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 (“the Project”). The SEP is designed to ensure that the Project’s plans for engagement with stakeholders during all phases of development of the Project are communicated and understood by all those concerned.

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

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

The SEP is a ‘living’ document and is being developed progressively, and updates issued, as the Project moves through the various phases of planning and implementation. This document is intended to provide an overview of stakeholder engagement activities undertaken during the development of the Project in Turkey (2015 – 2017) and planned engagement activities for the Construction & Pre-commissioning Phase of the Project.

Further updates will be issued as the Construction & Pre-commissioning Phase progresses.

The SEP is organised as follows:

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

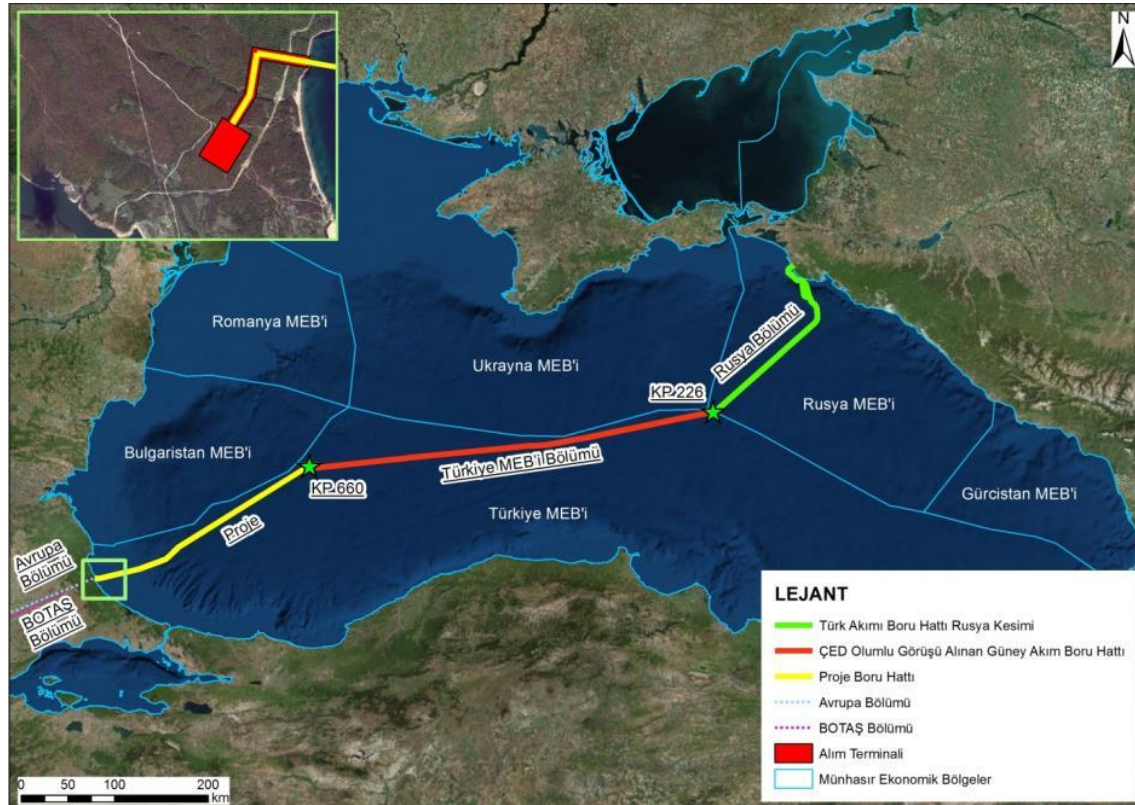
1.2 Background

1.2.1 TurkStream Gas Pipeline – Offshore Section

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

It is made up of two 32-inch (813 mm) diameter pipelines extending approximately 9300 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-Greek border to be transported further into Europe.

Figure 1-1 Route of the South Stream Offshore Pipeline



The Turkish Sector of the Turkstream Gas Pipeline – Offshore Sector (herein the Project) extends approximately 700 km from close to the border of the Turkish and Russian Exclusive Economic Zones 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 Kiyıköy, 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 will transition from sea to land) is at Selves Beach.

From the shore crossing, the Project extends approximately 2 km inland, where it will be connected to the receiving terminal. The offshore section, including the receiving terminal, will be designed and constructed by South Stream Transport B.V., a subsidiary of Russian gas company Gazprom.

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

The Project is being developed in phases, illustrated in Figure 1-2 below.

Figure 1-2 Project Phases

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

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. The company was founded as an international partnership between PAO Gazprom and European shareholder companies. In December of 2014, PAO Gazprom became the sole shareholder in South Stream Transport B.V., thus assuming responsibility for the TurkStream Gas Pipeline – Offshore Section. 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 Turkstream Transport's commitment to develop

and operate the Turkstream Offshore Pipeline in an environmentally and socially responsible manner.

The EIA Report describes the main characteristics of the Project and the measures that will be implemented to avoid and minimise potential environmental and social impacts of the Project. Comment periods to enable interested stakeholders to provide feedback on the EIA process and report were undertaken in accordance with Turkish legislative requirements; namely after the publication of the EIA Application File in May 2015, the draft EIA Report in June 2017, and Final EIA Report in September 2017. The Final EIA Report can be found online at: <http://turkstream.info/> Additional environmental and social assessments have also been performed in to support the development of the EIA and Environmental and Social Management Plans. These assessments include a Socio-Economic Impact Assessment conducted between January – June 2017, a Fisheries Impact Assessment conducted between August – November 2017, and a Traffic Impact Assessment conducted in December 2017. Some of these assessments have included a consultation component whereby stakeholders were able to identify potential impacts related to the Project and / or comment of the findings of the impact assessment and related mitigation measures.

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.

1.2.3 Environmental and Social Management and Monitoring

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

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

1.3 Objectives of Stakeholder Engagement

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

The Company is committed to a transparent and respectful dialogue with stakeholders throughout the life of the Project. The activities of engagement are guided by Good International Industry

Practice (GIIP), as well as all applicable laws and regulations in the countries where the Project operates.

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

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

1.4 Coordination with BOTAS

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

The Company works with BOTAS on a variety of issues related to the Project. Stakeholder concerns common to both projects have been identified and the two companies shall work together to coordinate responses to these concerns where applicable.

2 Regulatory Framework

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

2.1 Turkish Regulatory Requirements

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

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

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

Table 2-1 Engagement Requirements for Turkish EIA Process

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

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

2.2 Good International Industry Practice

The Project's approach to stakeholder engagement is guided by the principles of GIIP, which underscore the importance of stakeholder engagement in building constructive relationships that are essential for environmental and social issues to be managed successfully. In addition to the regulatory requirements for stakeholder engagement as part of the EIA process which are described above, the Project has undertaken supplementary engagement activities that are not directly related to the EIA. These voluntary engagement activities are described further in Section 4 of this SEP.

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

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. Kiyikoy experiences a high intake of visiting tourists during summer months, in the region of 5,000 – 10,000 visitors during a weekend. As such, services catering to tourism including accommodation and restaurants are also a significant economic activity 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 neighborhood which lies outside of the town walls.

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

The closest cities to the Project are Saray and Vize, located respectively 28 km to the southwest and to the west of the landfall location.

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

Figure 3-1 Map of Project Location in Kiyikoy

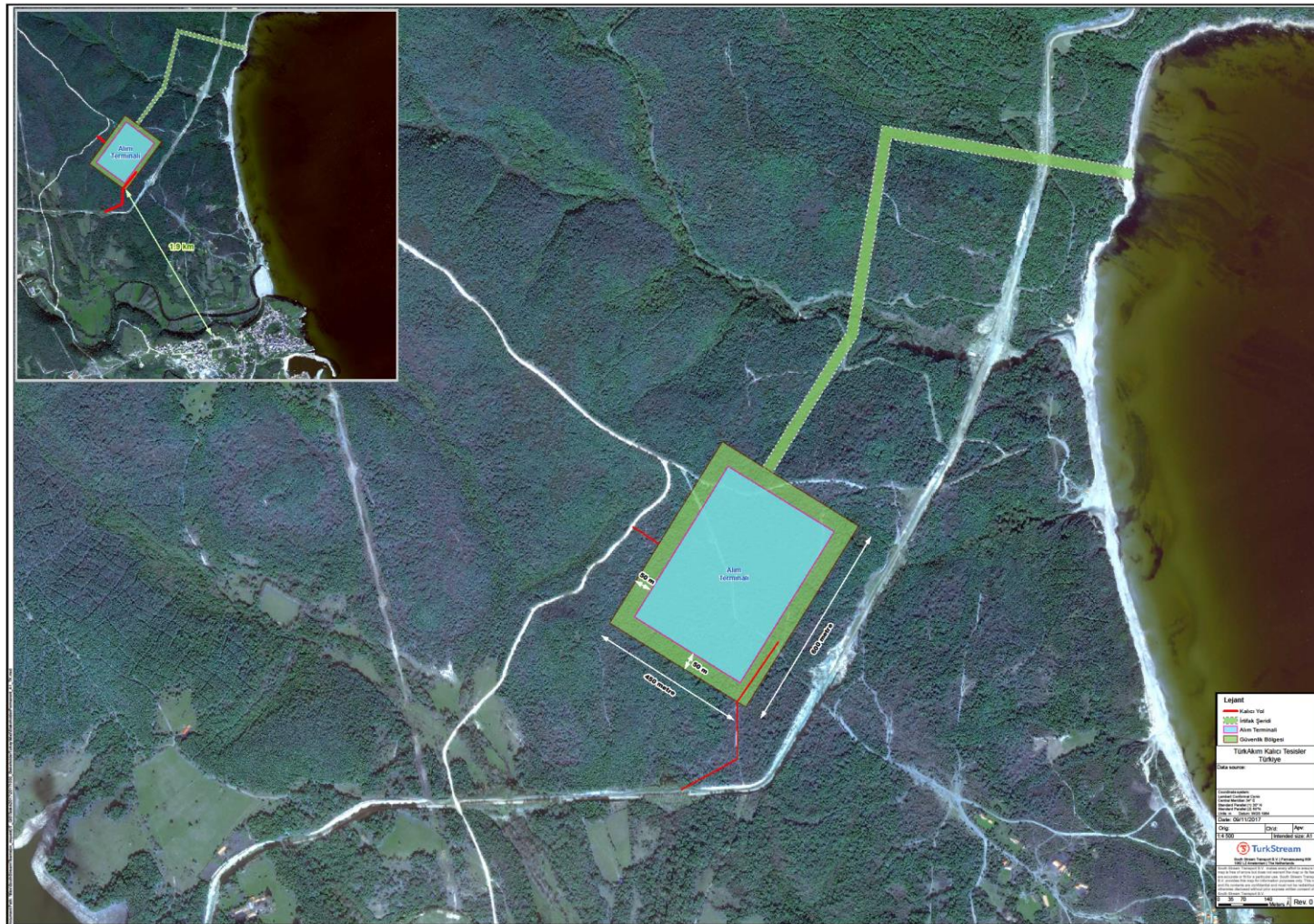
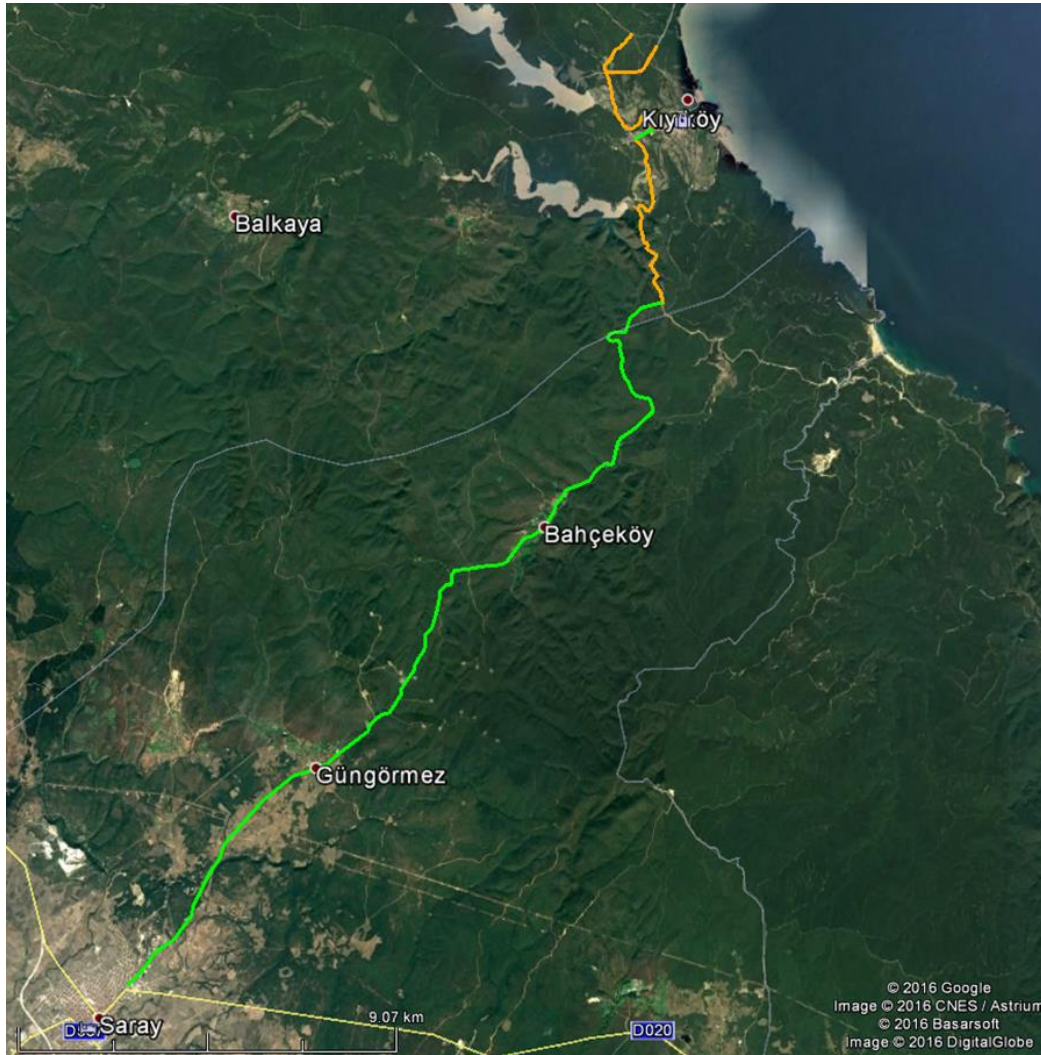


Figure 3-2 Map of Project Access Route



3.1.2 Local Communities

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

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

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

Bahcekoy, Gungormez and Saray are considered to be Traffic-Impacted Communities given the potential for impacts stemming from road traffic to the landfall location using the access route through these communities. Whilst other communities are located along Project transportation routes, construction traffic will be using main highways that bypass other settlements, thus minimising the potential for impacts.

Table 3-1 summarises the Local Communities in Turkey.

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
<i>Saray District</i>		
Bahcekoy village	356	12 km
Gungormez village	1,316	19 km
Saray city	24,960	28 km

Within Kiyikoy Local Community, a number of specific areas of interest are also identified, including:

- Selves Beach, where the Project comes ashore;
- The Kiyikoy fishing community, based in Kiyikoy fishing port located south of the town, and who fish within the nearshore area where the Project comes ashore. The fishing community in Kiyikoy is represented by the Kiyikoy Fishing Cooperative;
- Tourism services in Kiyikoy, such as camping, restaurants and accommodation providers, and who are reliant on visiting tourists for income, and some of which overlook the area of the

landfall location. A large proportion of the tourism services in Kiyikoy are affiliated to the Kiyikoy and Vize Tourism Association;

- The Kiyikoy forestry community, who engage in lumbering in the forests surrounding Kiyikoy and whose activities are primarily based in and around the landfall location. The Kiyikoy forestry community is represented by the Kiyikoy Agricultural Development (Forestry) Cooperative;
- Individuals involved in animal husbandry and beekeeping who are located close to the landfall location, as well along Project construction traffic access routes to the south of the town; and
- Four households in Kiyikoy who are located along the main access road to the landfall location and who may specifically experience impacts in relation to Project construction traffic.

3.1.3 Other Communities

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

The communities of Aksicim, Balkaya, Hamidiye, Kislacik, Kizilirmak and Komurkoy are not considered to be a Local Communities due to their distance from Project activities – between 7 km and 18 km away respectively.

The port at Samsun is used as a marshalling yards. However, the area is currently developed and operating as industrial ports. No new land development is anticipated and Project activities will be consistent with existing port activities. As such, the city of Samsun is not considered to be a Local Community.

3.2 Stakeholder Identification and Mapping

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

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

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

Stakeholders for the Project have been identified in several ways. These include:

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

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

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

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

Table 3-2 Stakeholder Categories and Identification

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
Land Owners		
<p>The Project requires some temporary and permanent acquisition of land, which will require agreements with applicable landowners.</p> <p>The majority of Project landtake lies within State Forestry land or Treasury Land (for the shore-crossing). Some additional temporary acquisition of private land is required to widen roads within Kiyikoy to make them accessible for construction traffic.</p> <p>Additionally, some landowners in the vicinity of the Project may be affected by Project activities, including changes to viewscales or environmental conditions.</p>	<p>Ministry of Forestry and Water Affairs</p> <p>ISKI (landowner along some parcels of Project access roads in Kiyikoy)</p> <p>Private landowners along some parcels of Project access roads in Kiyikoy.</p>	<p>The Company has engaged with the Ministry of Forestry and Water Affairs and other state agencies who own the majority of the land affected by the Project.</p> <p>Affected private landowners have also been engaged with regard to temporarily acquiring parcels of land to widen the access roads.</p> <p>Land purchase and/or use agreements with the applicable landowners in accordance with Turkish regulatory requirements.</p>

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
Land Users		
<p>The Project requires some temporary and permanent acquisition of land within the forest and on the beach, and as such may affect access to these areas.</p> <p>People who work on or use areas affected by project landtake may also be affected by access restrictions, which may consequentially have impacts on livelihood activities.</p> <p>Additionally, Project activities may result in changes to the amenity of certain areas, such as changes to viewscapes or environmental conditions, which may also impact livelihood activities (e.g. reduced recreational amenity may impact tourism).</p>	<p>Forest lumber workers, animal husbandry owners, beekeepers, hunters, recreational visitors (campers, trekkers, tourists, etc.) who use the Selves Beach, the area around the landfall section and around the access roads.</p> <p>Kiyikoy Agricultural Development (Forestry Cooperative), Kirklareli Water Buffalo Union, Kiyikoy and Vize Tourism Association</p>	<p>Engagement with land users has involved public disclosure of Project documentation (including the draft EIA Report), group meetings with representative groups of affected stakeholders, and an Open Day event in Kiyikoy.</p> <p>Specific engagement has also been undertaken with Kiyikoy Agricultural Development (Forestry) Cooperative, animal husbandry owners using the areas to the north and south of Kiyikoy town, individual beekeepers located around the Project area, and Kiyikoy and Vize Tourism Association.</p> <p>These specific engagements have aimed to collect data on their activities, assess how potential impacts to their use and access of these areas would affect their livelihood activities or recreational amenity, and discuss potential measures to avoid, minimise or compensate impacts.</p> <p>Specific engagement has also occurred with Kiyikoy Municipality and Kiyikoy muhtars, who can speak on behalf of potentially affected stakeholders as official community representatives.</p> <p>Although no organised group of beach users or recreational visitors have been identified, a combination of engagement with Kiyikoy Municipality, muhtars and Kiyikoy Tourism Association has been used as a proxy for this group.</p> <p>Meetings have also been held with the aforementioned groups to discuss potential Community Investment projects, both in terms of projects implemented in 2017 and to identify projects that could be implemented during the construction phase (2018-2019).</p>

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
Marine Area Users		
Fishermen and fisheries organisations (including fishing businesses) may be interested in and affected by potential Project impacts on fishing activities and livelihoods, including access to fishing areas and changes in fish health, migration and catch volumes. They could also be concerned about unplanned events (e.g. fuel spills) and how these events could affect fishing activities, as well as long-term impacts of the pipeline on local fish stocks and access to fishing areas.	<p>Kiyikoy Fishing Cooperative, local Kiyikoy fishermen, fishing enterprises from other ports that fish within Kiyikoy fishing grounds.</p> <p>National Union of Fisheries Cooperatives (SUR-KOOP)</p>	<p>Regular and targeted engagement has been undertaken with Kiyikoy Fishing Cooperative and in informal and formal group meetings with fishermen in Kiyikoy since 2015. Engagement has included meetings to gather baseline information for the EIA report, socio-economic impact assessment and a bespoke Fishing Study carried out by international consultants, as well as to assess potential impacts on fishing. Engagement meetings have also focused on sharing Project information with fishermen, and understanding and responding to concerns in relation to the Project.</p> <p>During marine surveys activities, regular notifications have been issued to the Kiyikoy Fishing Cooperative to circulate among fishermen informing them about the survey activities and any safety restrictions.</p> <p>Meetings have also been held with Kiyikoy Fishing Cooperative and fishermen to discuss potential Community Investment projects, both in terms of projects implemented in 2017 and to identify projects that could be implemented during the construction phase (2018-2019).</p>
Offshore oil-and-gas exploration companies also have an interest in accessing and using the marine area.	TPAO	Meetings and exchanges of information and data took place regarding the proposed pipeline route and coordination of activities between the Project and TPAO activities.

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

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
<p>Within Local Communities, there are also local representatives officials, opinion leaders, groups or bodies who are able to speak on behalf a wider cross-section of the community. They are, therefore, influential in both sharing information with community and represent their interests.</p> <p>These community representatives therefore have a general interest in the potential impacts and benefits of the Project on the people or groups who they represent.</p>	<p>Kiyikoy Muhtars (three muhtars of Cumhuriyet, Kale and Guven neighbourhood respectively).</p> <p>Bahcekoy Muhtar</p> <p>Gungormez Muhtar</p> <p>Management Board of Kiyikoy Fishing Cooperative</p> <p>Management Board of Kiyikoy and Vize Tourism Association</p> <p>Management Board of Kiyikoy Agricultural Development (Forestry) Cooperative</p> <p>Kiyikoy representatives of Kırklareli Water Buffalo Union</p> <p>Management Board of Roma Association</p>	<p>Regular engagement has occurred with muhtars, and the management board of the various representative cooperatives and associations in Kiyikoy to inform them about the Project, collect socio-economic data, discuss potential impacts and mitigation measures and for the identification and development of Community Investment projects.</p> <p>Community representatives were also taken to visit the Blue Stream project in Samsun as an example of a representative project similar to the TurkStream Gas Pipeline – Offshore Section.</p>
Businesses and Business Associations		
<p>Local businesses may benefit from procurement opportunities related to the provision of goods and services to the Project. Conversely, other businesses may be concerned about potential impacts on business revenues, particularly in relation to the tourism sector.</p>	<p>Construction-related businesses and related support services (e.g. catering, security, accommodation, environmental management).</p> <p>Kiyikoy and Vize Tourism Association</p> <p>Employment Agency ISKUR, Thrace Development Agency and Chamber of Commerce of Vize District.</p> <p>Port and related industry in Samsun</p>	<p>In relation to procurement, engagement has primarily occurred with local accommodation providers in Kiyikoy to inform them about expected workforce accommodation arrangements.</p> <p>Targeted engagement has been undertaken with Kiyikoy and Vize Association to discuss potential impacts of the project in relation to tourism, and to identify potential community investment projects that would benefit the tourism industry in Kiyikoy.</p> <p>Employment, development and representative trade associations have been engaged as part of socio-economic data collection and to identify potential opportunities for community investment.</p>

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
General Public (including residents of, and visitors to, the Local Communities)		
Local Communities may be affected by impacts related to traffic, noise, and environmental changes, as well as changes to land use and access (including the beach and surrounding forest). They may also be able to benefit through employment and business opportunities, or interested in local improvements such as potential access to gas supply.	<p>Residents of Local Communities (Kiyikoy, Bahcekoy, Gungormez) and tourists / visitors to these Local Communities.</p> <p>Residents of surrounding settlements</p>	The general public has been engaged through a variety of engagement activities, including the publication of Project documentation (including the draft EIA Report), the Kiyikoy Open Day event, and announcements via the Project website.
Community Service and Infrastructure Organisations		
Community service and infrastructure providers are interested in how the Project might impact on community services and infrastructure development plans. This may include direct impacts (e.g. on road infrastructure or water mains) or indirect impacts (e.g. increased strain on local services due to use by Project workforce)	<p>Borusan wind-farm (power generation), ISKI (Istanbul Water and Sewerage Administration), Directorate of Roads and Highways, TREIAS (electricity connection), TREDAS (communication lines)</p> <p>Kiyikoy Gendarmerie</p> <p>Kiyikoy education facilities (pre-primary-secondary-high schools)</p> <p>Kiyikoy health facilities (Kiyikoy family health centre and Kiyikoy emergency unit), Saray hospital, Vize hospital</p>	<p>Direct engagement has occurred with Borusan (previously AKSA) wind farm and ISKI in terms of Project design and development due to interactions with their infrastructure and plans. Engagement has also occurred with TREIAS and TREDAS with regard to connections for the Receiving Terminal.</p> <p>Regular engagement has occurred with Kiyikoy Gendarmerie with regard to safety and security of site personnel, and provisions for security arrangements during construction and operations.</p> <p>Some engagement has occurred with Kiyikoy health facilities to understand their capacity in order to plan for construction workforce health arrangements.</p> <p>Other engagements with Kiyikoy health facilities and schools have occurred with regard to the identification and development of community investment projects.</p> <p>Engagement with community service and infrastructure organisations has involved public disclosure of project documentation (including the EIA Scoping Report and draft Report), via the Turkstream Transport website, announcements in newspapers and poster campaigns. These reports have been accompanied by public comment periods and public meetings.</p> <p>Individual meetings were also held with these stakeholders to gather socio-economic and health baseline information and seek feedback.</p> <p>Since completion of the EIA process, the Project has sought to engage SOS Families at Risk and Sauchastie who work with commercial sex workers in the Varna area.</p>

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
National and Regional Government Authorities		
National authorities have an interest in the national EIA and permitting procedures, particularly in terms of ensuring compliance with Turkish regulations. In addition to their regulatory role, government departments have specific interests in topic areas such as the environment, cultural heritage, transport and fisheries, etc.	Turkish national authorities (e.g. Ministry of Energy and Natural Resources, Ministry of Environment and Urbanization, Ministry of Culture and Tourism, Ministry of Food, Agriculture and Livestock, etc).	National authorities have been informed and consulted as part of the EIA process, as well as specific permitting procedures. Engagement with various government departments responsible for specific topics of interest has been ongoing through the EIA and permitting processes.
<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-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>Province, Vize and Saray District, Kiyikoy Municipality</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>	<p>Regional institutions have been engaged throughout the course of the Project, as part of both the EIA process and permitting procedures, as well as data collection for environmental and social impact assessments and the Community Investment Programme.</p> <p>Introductory and project updates meetings have been held with relevant regional officials, including Governor, sub-Governors, Mayors and MPs to inform them about the Project.</p>

Interest in the Project	Stakeholders Identified	Summary of Engagement to Date
Non-Governmental Organisations		
NGOs (including local, national and international NGOs, as well as other community based organisations) may be interested in a diverse set of issues, ranging from protection of the terrestrial environment and forests, and Black Sea ecology, to archaeological assets, to potential impacts on tourism and other industries. NGOs are often interested in reviewing and commenting on EIA documents, particularly in regard to the identification of environmental and social impacts and the ways that these impacts will be mitigated and managed.	Local and regional NGOs interested in environmental protection and ecosystems such as Northern Forestry Defence Initiative, Thrace Platform	<p>NGOs have had the opportunity to review and comment on the EIA Application File and the draft and final EIA Report.</p> <p>Informal meetings were held with NGO representatives and activists in mid-2015 through community engagement consultants Stratejico to identify comments and concerns of regional NGOs in relation to the Project.</p>
Academic and Research Organisations		
Academic and research organisations may be interested in data from the Project's numerous marine surveys, as well as the potential effects on the marine environment or ecology, marine cultural heritage and environmental protection.	University faculties across Turkey with a focus on engineering, marine sciences, physical and ecological environment, and cultural heritage.	<p>Some research institutes and university departments have been engaged to support the preparation of the EIA Report and other studies.</p> <p>Academic and research organisations have also had the opportunity to review and comment on the EIA Application File and the draft and final EIA Report.</p>
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. Interested in general Project information including updates on the EIA process.	Turkish media at national, regional and local levels.	Engagement with the media has occurred through press releases, announcements, interviews and press conferences. Local media have also been engaged in response to local issues and current events, and on specific topics of interest to the Local Communities.

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

Vulnerable Groups

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

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

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

3.3 Disclosure and Engagement Methods and Materials

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

The stakeholder engagement process includes two-way targeted engagement related to specific potential Project impacts, for example traffic, impacts to fishing, and impacts to animal husbandry activities. Impact assessment studies to date 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; however, engagement activities will continue to be organised around specific topics of interest and known concerns of stakeholders.

3.3.1 Project Disclosure Methods

Information about the Project is disclosed in several ways: via the internet (publication of reports, email), 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). 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; any risks to and potential impacts on Local Communities and relevant mitigation measures; and stakeholder engagement and grievance mechanism processes helps Local Communities and other stakeholders understand the risks, impacts and opportunities of the Project.

3.3.2 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 engagement materials produced are listed in Table 3-3, with copies of the materials developed to date available in Appendix F.

Table 3-3 Engagement Materials Produced

Type	Details
Documents disclosed as part of the EIA process	EIA Application File Draft EIA Report Final EIA Report
Additional documents to be disclosed	Stakeholder Engagement Plan Social Management Plan* Environmental and Social Overview Report* Community Needs Assessment Non-Technical Summary*
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 <p>Project updates published on website and in print Maps, posters and banners displayed at meetings Presentations used in meetings</p>

* Upcoming activity.

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	Newspaper announcements, hard copies of documents and materials distributed and made available in communities Kiyikoy Information Centre.	Email, telephone, post and in person Group meetings and public events
Landowners	Relevant information sent directly to affected landowners	Email, telephone, post and in person Meetings with Project representatives
Land users Fisheries and Marine area users	Hard copies of documents and materials distributed and made available in communities Notifications and key documents and invitations to meet with South Stream Transport have also been addressed to specific stakeholders.	Email, telephone, post and in person Public events Individual and group meetings
Government authorities	Notifications, key documents and invitations to meet have been addressed to specific stakeholders.	Email, telephone, post and in person Meetings and correspondence
Inter-governmental organisations	Website Newspaper announcements	Email, telephone, and post
Non-governmental organisations (NGOs)	Website Newspaper announcement Invitations to meet with have also been addressed to specific stakeholders.	Email, telephone, post, in person
Community Service and Infrastructure 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 Meetings and correspondence

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

4 Completed Stakeholder Engagement

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, additional environmental and social assessments, and for the development of the Community Investment Programme. The primary consultation activities are summarised below in Table 4-1, whilst a fuller list of consultations held to date is contained in Appendix C. Please note that as a forward-looking plan, this SEP does not provide extensive detail on past engagement activities.

Table 4-1 Summary of Completed Engagement Activities

Event	Date	Engagement
EIA Application File	July 2015	The EIA Application File was published by the MoEU on 2 July 2015, initiating the public EIA procedure.
EIA Public Participation Meeting	July 2015	<p>An EIA Public Participation meeting was held in Kiyikoy on 21 July 2015 whereby the company responsible for preparing the EIA Application File and Project representative could inform the public about the Project, receive feedback and respond to comment.</p> <p>Announcements advertising the meeting were published in local newspapers 10 days prior to the meeting and on the MoEU website (Appendix D).</p> <p>The meeting could not go ahead due to a public protest. The MoEU later confirmed the EIA process could proceed on the basis of the opinions received from public authorities comprising the EIA Review and Evaluation Committee and issued the scope and format of the EIA Report. This scope refers to a list of topics and issues that need to be covered in the EIA Report.</p>
Introductory meetings with members of Kiyikoy Local Community and regional NGOs and Initiation of Community Engagement Programme	August-October 2015 December 2016 – January 2017	<p>A series of introductory meetings were undertaken with community representatives and members by community engagement consultants Stratejico to understand community concerns in relation to the Project and what had prompted the protest during the EIA Public Participation Meeting. These were followed with meetings with representatives of regional NGOs. The issues raised by stakeholders were relayed to the Project to consider as part of Project development and developing an ongoing community engagement process.</p> <p>Introductory and follow up meetings were also held where Project representatives were present with Kiyikoy Municipality and Kiyikoy Fishing Cooperative.</p> <p>Following a Project hiatus between the end of 2015 and the end of 2016, contacts were re-established with community representatives at the end of 2016, and a series of re-</p>

Event	Date	Engagement
		introductory meetings were held to brief them on the status of the Project and collect feedback.
Environmental and social impact assessment studies	September 2015 – November 2017	<p>Engagement with various stakeholders at national, regional and local level for the purposes of collecting and ground-truthing baseline information and discussing potential impacts and mitigations.</p> <p>Engagement has included:</p> <ul style="list-style-type: none"> Interviews with local government and community representatives, land users, marine users, businesses and business associations and community services and infrastructure as part of the socio-economic impact assessment undertaken by consultants Mikado as part of the EIA process; interviews with animal husbandry members and beekeepers undertaken by Project representatives; and interviews and group meetings to inform the Fishing Study were undertaken by international consultants MRAG. <p>The outcomes of these engagements resulted in the assessment of environmental and social impacts and development of mitigation measures detailed in the EIA Report, and the refinement of mitigation measures in Environmental and Social Management Plans once the EIA process was completed.</p>
Introductory meetings with regional authorities	February – May 2017	High level introductory meeting as part of relationship-building have been conducted with authorities in Kırklareli and Tekirdağ in February 2017 and Vize and Saray in May 2017.
Development of 2017 Community Investment Programme	March – May 2017	Engagement meetings were held with Kiyikoy community representatives, health facilities and education facilities to collect information on potential opportunities to invest in 'small scale' community investment projects in 2017. This involved a series of individual and small group meetings with relevant stakeholders to identify and select projects based on priority 'needs' they identified in the community or among particular interest groups (i.e. fishing, tourism). A group meeting was held in May 2017 to agree on the final selection of preferred projects to be taken forward for implementation.
Publication of draft and Final EIA Report	June 2017 (draft EIA) and September 2017 (Final EIA)	<p>The Draft EIA report was submitted to the MoEU in June 2017 and published by the MoEU on their website for public comments.</p> <p>The EIA REC Meeting was held on 4 July 2017 and no substantive comments were made on the draft EIA Report.</p> <p>The final EIA Report was submitted to the MoEU and published for public comment in September 2017. The EIA</p>

Event	Date	Engagement
		Report was subsequently approved by the MoEU on 29 September 2017.
Project Information Meetings	July – October 2017	A targeted series of group meetings were undertaken with specific interest groups in Kiyikoy to share key information about the Project and its impacts, receive feedback and respond to questions.
Introductory meetings with muhtars in Bahcekoy and Gungormez	August - October 2017	Introductory and follow up meetings were held with muhtars in Güngörmez and Bahceköy to inform them about the Project and to discuss traffic management and mitigation measures. The feedback received was considered in the context of the traffic assessment performed at the end of 2017 which will inform the Construction Traffic Management Plan.
Appointment of Community Liaison Officer (CLO)	August 2017	The Project appointed a Community Liaison Officer in August 2017 to act as the main focal point for community relations. Whilst not a specific engagement activity, the CLO has contributed to ongoing and frequent engagement presence primarily in Kiyikoy.
Blue Stream visit	August 2017	A visit to the Blue Stream project in Samsun was arranged for community representatives in Kiyikoy to learn about how a similar project was constructed and operates. As part of the visit, information exchanges were organised between Kiyikoy community representatives and stakeholders in Samsun who could speak knowledgeably about their experiences with the Blue Stream project.
Kiyikoy Open Day Event	November 2017	The Company organised a public forum for Kiyikoy community members on 12 November 2017 to learn about the Project. Information posters, maps and interactive presentations were put on display, leaflets and brochures explaining aspects of the Project were distributed, and Project representatives were on hand to explain information about the Project and its expected impacts.
Community Needs Assessment	November – December 2017	A Community Needs Assessment (CNA) was undertaken in November and December 2017 to inform the development of the Community Investment Programme for the construction phase. The CNA involved data collection meetings with regional and local stakeholders, as well as meetings to identify opportunities for investment, community needs and priorities.
Visit to Kiyikoy by Project CEO	December 2017	The Project CEO held introductory meetings with Kiyikoy Mayor and the Head of the Fishing Cooperative during a visit to Kiyikoy in December 2017. The CEO reiterated the Project's commitments to address environmental and social impacts, deliver benefits and work collaboratively with the community during these meetings. The Mayor and the Head of the Fishing

Event	Date	Engagement
		Cooperative had the opportunity to provide their own views and comments on the Project. During the visit, a joint tree-planting ceremony was organised between the Mayor and the CEO in the area around the new football pitch and multipurpose sports court which the Project has invested in as part of the Community Investment Programme.
EIA and Permitting	2015 -ongoing	Engagement with various government stakeholders to discuss permitting requirements and processes and provide updates regarding Project development.

The following sections provide further details on the stakeholder engagement activities which have taken place to date.

4.1 Public Engagement for the EIA Process – June 2015 – September 2017

4.1.1 EIA Application File and EIA Public Participation Meeting

Public engagement for the EIA process began with the publication of the EIA Application File in June 2015 by the MoEU, which explained the Project and summarised its expected impacts. Public comments on the Project and the EIA Application File could be received in writing to either the MoEU on the Kırklareli Provincial Directorate of Environment and Urbanisation.

In line with Turkish regulatory requirements, a Public Participation Meeting (i.e. public hearing) was organized at the wedding hall Kiyikoy on 21 July 2015 at 11am. The purpose of the meeting was to provide information to the public about the Project and receive their feedback which would be considered by the MoEU in determining the Scope and Special Format of the EIA Report.

Details of Public Participation Meeting (venue, date, hour, etc.) were announced on 10 July 2015 in the national newspaper "Hurriyet" and the local newspaper "Vize Haber". The announcement text was also displayed on the billboard of Kırklareli Provincial Directorate of Environment and Urbanisation, on the billboard of Kiyikoy Town and at the entrance of the meeting hall 10 days before the meeting.

The Public Participation Meeting could not proceed and was cancelled by the MoEU, due to a protest demonstration organized by regional NGOs, environmental activists and local Kiyikoy community members with the participation of some local politicians.

No public comments on the Project and the EIA Application File were received by the MoEU. On the basis of opinions issued by members of the EIA Review and Evaluation Commission (REC), the MoEU issues the Scope and Special Format of the EIA Report and the EIA process continued. The REC is comprised on 23 public authorities:

- Ministry of Environment and Urbanisation:
 - General Directorate of Environmental Impacts, Permits and Inspections

- General Directorate of Protection of Natural Assets
- General Directorate of Spatial Planning
- General Directorate of Environmental Management
- Ministry of Energy and Natural Resources
 - Department of Transit Petroleum Pipelines
 - BOTAS
 - Turkish Petroleum Corporation (TPAO)
 - General Directorate of Mineral Research and Exploration (MTA)
- Ministry of Transport, Maritime Affairs and Communications
 - General Directorate of Shipyards and Coastal Structures
- Ministry of Culture and Tourism
 - General Directorate of Cultural Heritage and Museums
 - Edirne Regional Directorate Board for Protecting Cultural Assets
- Ministry of Forestry and Water Affairs
 - General Directorate of State of Hydraulic Work
 - General Directorate of Nature, Conservation and National Parks
 - General Directorate of Forestry
- Turkish Naval Forces:
 - General Directorate of Navigation, Hydrography and Oceanography (SHOD)
- Ministry of Interior:
 - Coast Guard Command
- Ministry of Health:
 - General Directorate of Public Health
- Ministry of Food, Agriculture and Livestock:
 - General Directorate of Fisheries and Aqua Products
- Kırklareli Governorship:
 - Kırklareli Provincial Directorate of Food, Agriculture and Livestock
 - Kırklareli Provincial Directorate of Environment and Urbanization
 - Kırklareli Provincial Directorate of Culture and Tourism
 - Kırklareli Special Provincial Administration – Directorate of Development and Urban Improvement
- İstanbul Su Ve Kanalizasyon İdaresi – İstanbul Water and Sewerage Administration (İSKİ)

Although the EIA Public Participation Meeting is the only mandatory public meeting required under EIA regulatory requirements, a programme of voluntary stakeholders engagement was initiated by the Project to build relationships with Local Communities and affected stakeholders given the negative reactions elicited during the protests. This included additional voluntary engagements to prepare a socio-economic impact assessment to inform the EIA Report and Project

Environmental and Social Management Plans. Details of these voluntary engagements are included in more detail in Section 4.2 of the SEP and beyond.

4.1.2 Draft EIA Report and Final EIA Report

The draft EIA Report was published by the MoEU in June 2017 on their website, with a comment period remaining open for the remainder of the EIA process. Any comments received within 10 days of publication would be considered by the MoEU in preparing comments to be addressed by the project owner in the final EIA Report.

No public comments were received during the draft EIA Report comment period. The EIA REC Meeting was held on 4 July 2017 in which comments and opinions on the draft EIA Report could be issued by the competent authorities that comprise the REC. No substantive comments on the draft EIA Report were received.

On this basis the final EIA Report was issued to the MoEU in September 2017, and was again published on the website of the MoEU for a period of 10 days for public comment. Comments received during this period would be considered in the context of issuing an EIA 'Positive' or 'Negative' decision. Although several public comments were received by the MoEU during this period, the MoEU did not consider the comments to substantively affect the contents of the EIA Report. An EIA Positive Decision was issued by the MoEU on 29 September 2017 and announced on their website.

4.2 Introductory community-level meetings and Initiation of Community Engagement Programme

4.2.1 August – November 2015

After the publication of the EIA Application File and the demonstrations surrounding the Public Participation Meeting in July 2015, the approach to engagement was modified to take account of the clear negative attitudes of a range of local stakeholders. To address the issues following the demonstrations it was paramount to meet local stakeholders so that:

- they could receive accurate Project information on which to base their views and opinions;
- their issues could be understood and actions taken to address such issues;
- the Project could present its approach to environmental and social management.

As a result a phased approach to community engagement was adopted with the following aims:

- Phase I: Open a communications channel ('get a seat at the table') through first meetings
- Phase II: Understand concerns and build credibility through personal and frequent engagement
- Phase III: Build trust through long-term engagement and by addressing key concerns

To initiate this phase of community engagement, an interim Community Contact was appointed from StratejiCo to act as a focal point for the Local Community, and act as an information conduit between the Company and the Local Community of Kiyikoy.

Introductory meetings were held by Stratejico with a range of local community representatives in Kiyikoy (Table 4-2), followed up with meeting in which Project representatives were present. These meetings had the following objectives:

- to re-open dialogue following the Public Participation Meeting protest;
- further understand current community economic activities and how the Project may interact with/impact these;
- better understand community concerns;
- understand how best to move forward a wider engagement with the local community;
- identify further community members and groups with whom to meet; and
- disseminate information to clear up misconceptions about the Project.

In addition, a set of informal meetings were held with regional NGOs to also understand their concerns in relation to the Project. The meetings held are summarised below.

Table 4-2 Introductory meetings with Kiyikoy Local Communities

Meeting	Stakeholder	Date	Location
Local Government	Kiyikoy Municipality	12 Aug 2015	Kiyikoy
Kiyikoy Local Community	Kiyikoy Fisheries Cooperative Union	21 Aug 2015	Kiyikoy
Kiyikoy Local Community	Kiyikoy Community representatives Kiyikoy businessmen and residents Regional NGOs/influencers	14 Sep 2015	Kiyikoy
Local Communities	Kiyikoy Municipality Kiyikoy muhtars	12 Nov 2015	Kiyikoy

The feedback from this initial set of meetings indicated that:

- There were numerous misconceptions about the Project, and the level of information about the Project and its expected impacts was generally low.
- There were several gaps in the level of socio-economic baseline data and that potential socio-economic impacts were a key concern for the Local Community.
- Community members generally expressed opinions that the location of the Project was too close to Kiyikoy town and should relocate further to the north to avoid impacts on fishing, tourism and animal husbandry.

4.2.2 December 2016 – January 2017

The Project could not immediately address the initial set of issues identified during the introductory engagement activities in 2015, as the Project entered into a period of suspension between late 2015 and late 2016. However, upon the restart of the Project, the community

engagement programme was re-initiated, a detailed socio-economic impact assessment was commissioned to be undertaken as part of the EIA process, a landfall location optimization process was undertaken which considered potential alternative locations for the Project based on a set of technical, environmental and social criteria.

In terms of the community engagement programme, the first step at this stage was to re-open a line of communication with key local stakeholders, re-introduce the Project to them and update them on key changes since 2015 suspension and start the process of re-building relationships.

Project representatives held a re-introductory meeting with Kiyikoy Mayor and an introductory meeting with Vize Governor on 9 December and a follow up meeting with the Mayor on 28 December 2016. The meetings primarily focused on the survey campaign being undertaken in Kiyikoy for site optimization.

Stratejico conducted meetings with Kiyikoy community representatives, namely muhtars, heads of cooperatives, as well as a Kiyikoy Municipal Council member and teahouse owner who both joined the discussions with the other stakeholders. The meetings were intended to inform stakeholders about the restart of the Project, the site optimization process and validate whether local opinions / attitudes about the Project had changed since 2015.

The following feedback was received during these meetings which informed the future phases of engagement:

- Community representatives were opposed to the landfall location in Selves, and preferred the Project to relocate north;
- Impacts on forestry, fishing and tourism income and livelihoods were still identified as being the greatest issues of concerns, particularly with regard to the landfall location in Selves;
- Local influencers generally do not want the project in Kiyikoy but accept that it will go ahead. Therefore they would like a more open channel of more communication with the Project and are receptive to further meetings involving Company representatives / experts;
- Community representatives were receptive to discussing community investments and are interested in improving the local economy;
- Misconceptions about the Project still persisted at community level, and stakeholders inferred that the Project should do more to share information about the Project with the wider community.

The issues raised were considered in the context of scaling up the community engagement programme. Issues related to socio-economic impacts were considered in the development of the socio-economic impact assessment to inform the EIA Report.

Whilst community concerns regarding the landfall location were taken into consideration, the selection of Selves as the optimal location for the Project was decided on the basis of nearshore and onshore geophysical surveys which indicated it was the only viable location for the shore-crossing and landfall within Kiyikoy. The Mayor and Community representatives of Kiyikoy were informed about this accordingly in April – May 2017.

4.3 Introductory and follow up meetings with regional public officials

As part of relationship-building, the Company initiated introductory meetings with relevant authorities in Kirklareli, Tekirdag, Saray and Vize.

On 8-9 February 2017, introductory meetings were held with the Provincial Governors and Metropolitan Municipality Mayor of Tekirdag and Kirklareli. They were informed about Project activities undertaken in 2015 and ongoing activities since the restart of Project activities in late 2016 (surveys, EIA/Social studies, etc.).

On 8th of February 2017, Tekirdag Governor and Kirklareli Mayor were met and introduced to the Project. They were informed about some of the work undertaken in 2015 and the stakeholders consulted and some of the issues encountered regarding the location. They also discussed the ongoing activities since the restart

In May 2017, a series of introductory meetings were also held with the District Sub-Governors and Mayors of Vize and Saray with similar information provided to them. Follow up updates meetings have been scheduled as necessary and at the discretion of these public authorities.

4.4 Environmental and Social baseline studies and impact assessment

4.4.1 September 2015 – March 2017

Beginning in September 2015, meetings were held with both public authorities and Local Communities to collect environmental, socio-economic and cultural heritage baseline information to inform the assessment of Project impacts detailed in the EIA Report and the development of mitigation measures.

Specifically as part of the EIA process, a socio-economic impact assessment was commissioned which involved a series of data collection meetings with various local and regional stakeholders including local communities (residents, businesses, cooperatives, etc.), local government (Kiyikoy Municipality), district government level (Vize), and provincial government level (Kirklareli).

As shown by Table 4-3, the meetings took place until end of March 2017.

Table 4-3 Socio-economic data collection meetings

Meeting	Stakeholders invited	Date	Location
Marine users	National Union of Fisheries Cooperatives (SUR-KOOP)	17 Sep 2015	Ankara
Provincial Governments	Kirklareli Provincial Directorate of Food, Agriculture and Livestock Kirklareli Provincial Directorate of Culture and Tourism	22 Oct 2015	Kirklareli

Meeting	Stakeholders invited	Date	Location
Regional Governments	Vize District Governorship Vize District Agricultural Directorate	22 Oct 2015	Vize
Local Government	Kiyikoy Municipality	22 Oct 2015	Kiyikoy
Local Communities	Kiyikoy Fisheries Cooperative Union Kiyikoy fishermen	22 Oct 2015	Kiyikoy
Local Communities	Kiyikoy Kosk restaurant Kiyikoy Resort Hotel Kiyikoy Marina Restaurant	22 Oct 2015	Kiyikoy
Regional Government	Vize Governor	16 Jan 2017	Vize
Regional Government	Vize Governorship: Social Assistance and Solidarity Foundation	16 Jan 2017	Vize
Regional Government	Vize Governorship: Department of Civil Registry	16 Jan 2017	Vize
Regional Government	Vize Forestry Directorate	16 Jan 2017	Vize
Regional Government	Vize Governorship: Directorate of Food, Agriculture and Livestock	16 Jan 2017	Vize
Regional Government	Vize Governorship: Directorate of National Education	16 Jan 2017	Vize
Regional Government	Vize Chamber of Commerce and Craftsmen	16 Jan 2017	Vize
Local Community	Kiyikoy Gendarme	16 Jan 2017	Kiyikoy
Local Community	Kiyikoy Resort Hotel	16 Jan 2017	Kiyikoy
Local Government	Kiyikoy Municipality	16 Jan 2017	Kiyikoy
Local Community	Kiyikoy Fishing Cooperative	17 Jan 2017	Kiyikoy
Local Community	Kiyikoy Muhtars	17 Jan 2017	Kiyikoy
Local Community	Kiyikoy Esfane Restaurant	17 Jan 2017	Kiyikoy
Local Community	Kiyikoy Residents – male workers	17 Mar 2017	Kiyikoy

Meeting	Stakeholders invited	Date	Location
Provincial Government	Kirklareli Provincial Directorate of Food, Agriculture and Livestock	29 Mar 2017	Kirklareli
Local Community	Kiyikoy Tourism Association	29 Mar 2017	Kiyikoy
Provincial Government	Kirklareli Provincial Directorate of Culture and Tourism	29 Mar 2017	Kirklareli
Provincial Government	Kirklareli Family and Social Policies Directorate	29 Mar 2017	Kirklareli
Local Community	Kiyikoy representatives of Kirklareli Water Buffalo Union	30 Mar 2017	Kiyikoy
Local Community	Kiyikoy Fishing Cooperative	30 Mar 2017	Kiyikoy
Local Community	Kiyikoy Gendarme	30 Mar 2017	Kiyikoy
Local Community	Kiyikoy Hunters	30 Mar 2017	Kiyikoy
Local Community	Kiyikoy Muhtars	30 Mar 2017	Kiyikoy
Local Government	Kiyikoy Municipality	30 Mar 2017	Kiyikoy
Provincial Government	Kirklareli Branch of Trakya Development Agency	30 Mar 2017	Kirklareli
Local Community	Kiyikoy residents – female workers	30 Mar 2017	Kiyikoy

The information provided during these meetings was assessed in the context of the socio-economic impact assessment and described in the EIA Report, including the proposed mitigation measures to avoid, minimize or compensate for potential socio-economic impacts.

4.4.2 August – November 2017

Subsequent to the finalization of the EIA Report, further meetings have been conducted as part of socio-economic data collection on specific areas to assess identified impacts in more detail and refine the mitigation measures outlined in the EIA Report. These have formed part of additional assessments which will inform Project ESMPs which will be implemented during construction.

The meetings have included interviews with beekeepers who are located close to Project activities; group and individual interviews with animal husbandry members; and group and individual interviews with the Kiyikoy Fishing Cooperative and Kiyikoy fishermen as part of the MRAG Fishing Study, as outlined in Table 4-4.

Table 4-4 Meetings with local stakeholder to finalise the socio-economic data collection

Stakeholders invited	Date	Location
Kiyikoy Beekeepers	Series of individual meetings between August – November 2017	Kiyikoy
Kiyikoy Animal Husbandry members	Series of individual and group meetings between August – October 2017	Kiyikoy
Kiyikoy Fishing Cooperative and fishermen	Individual and small group meetings on 17 August 2017 and 28 November 2017	Kiyikoy

The meetings with the beekeepers focused on potential impacts of construction on their beehives and resulted in an agreement that the Project would cover the costs of relocation to an alternative location.

Meetings with animal husbandry members focused on collecting information on the number of livestock they own, their grazing areas and water sources and their access routes to these locations. The meetings confirmed that the majority of animal husbandry members located in the Selves area would be impacted in terms of accessing grazing lands, water sources, and in the case of water buffalo accessing wading holes due to construction activities and traffic. The arrangements to address these issues will be agreed with animal husbandry members prior to the start of construction. Suitable measures will also be agreed with animal husbandry members located to the west and south of Kiyikoy town commensurate with the identified impacts.

Meetings with fishermen were used to collect and validate data with regard to their fishing grounds, techniques and catch information. The draft findings of the MRAG Fishing Study in terms of potential impacts to fishing were then presented to fishermen at the end of November 2017.

4.5 Community Investment Programme

4.5.1 Short-term Community Investments, Q1 – Q2 2017

The Project initiated a Community Investment Programme (CIP) in early 2017. As part of the CIP, a preliminary 'Community Needs Assessment' was undertaken March – May 2017 (see Table 4-5), with the aim of identifying short-term projects which could be implemented during the year. The aim of this approach was to demonstrate 'good faith' with local communities and that Project can be a reliable and positive contributor.

A range of meetings were held in this period to identify community needs and potential opportunities for investment. The community stakeholders consulted included: Kiyikoy

Municipality; Kiyikoy Muhtars; Kiyikoy Fishing Cooperative; Kiyikoy Agricultural Development (Forestry) Cooperative; Kiyikoy Animal Husbandry Cooperative; Kiyikoy Tourism Association; members of Kiyikoy Municipal Council; Kiyikoy primary, secondary and high schools, and Kiyikoy Health Clinic.

Based on these meetings, potential projects were assessed internally in terms of benefits, costs, feasibility to implement including any permitting implications and practical challenges. Based on this assessment, a shortlist of potential 'short-term' projects was put together and discussed with community representatives, so that they could prioritize and agree on the projects to take forward. The shortlist of projects to take forward for Company approval was agreed with stakeholders during meetings on 31 May 2017.

During this process, stakeholders were informed that a more detailed Community Investment Programme would be developed to coincide with the construction phase and would be supported by a Community Needs Assessment to be undertaken at the end of the year (see Section 4.5.2).

Table 4-5 Summary of Short-term Community Investment Projects, 2017

Investment Area	Project	Status
Improvement of the Kiyikoy Municipal Beach	Refurbishment of toilets / changing rooms	Will be completed in Q1 2018.
	Donation to improve safety measures on municipal beach (lifejackets, safety boats, loudspeakers), including the construction of lifeguard towers.	Donation of equipment completed November 2017 Construction of lifeguard towers will be completed in Q1 2018.
	Donation to improve recreational facilities on the Municipal beach (sun loungers and volleyball net)	Completed November 2017.
Improvement of recreational/leisure facilities in Kiyikoy	Construction of new football pitch. Construction will be an open-air pitch initially, with option to convert to a closed pitch at a later date.	Completed December 2017.
	Multipurpose Sports Field Floor (used for Basketball, Tennis and Volleyball)	Implementation underway. Will be completed in Q1 2018.
	Donation of new playground equipment	Will be completed in Q1 2018.

Support to Education and Health Sectors	Health Clinic Donation (Electrocardiogram machine, seating and back-up generator)	Completed in November 2017.
	Schools Donation (fire extinguishers, smoke detectors, and additional items to be determined with schools – primary, secondary and high school)	Completed in September 2017.
	Heating insulation of 3 schools	Completed in September 2017.
Community Events and Activities	Photography Workshops for Children	Q2 2018 to coincide with spring weather.
Investments in Economic Sectors and Donations to Cooperatives	Donation for shore-pulley system for vessel maintenance	Completed in December 2018.
	Donation of computer and printer to Kiyikoy Fishing Cooperative and Kiyikoy Agricultural Development (Forestry) Cooperative	Completed in August 2017.
	Development of Kiyikoy tourism brochures in cooperation with Kiyikoy Tourism Association.	Ongoing. Will be completed in Q1 2018.

In addition to the above projects agreed in May 2017, two further community investment projects were initiated at the end of 2017:

- financial contribution to implement the dredging of Kiyikoy port harbour which was blocked because of excess silt (agreed on the basis of a request from Kiyikoy Fishing Cooperative; and
- a landscaping and tree-planting scheme to improve the aesthetics around the site of the new football field and multipurpose sports court.

Figure 4-1: Photos of Community Investment Projects undertaken in 2017



Electrocardiogram machine donated to Kiyikoy Health Clinic



New football pitch constructed in Guven Neighbourhood

During a visit to Kiyikoy by the Company Chief Executive Officer (CEO) in December 2017, Kiyikoy Mayor provided a plaque in recognition of the Project's Community Investment Programme to the CEO during a tree-planting ceremony around the football pitch location. In addition, a commemorative plaque and traditional artwork was provided by teachers in Kiyikoy to Project representatives in gratitude to community investments in Kiyikoy schools.

Figure 4-2: Meeting with School Teachers in Kiyikoy, December 2017



4.5.2 Community Needs Assessment, Q4 2017

In order to develop the longer-term Community Investment Programme to be implemented during the construction phase, the Project has undertaken a Community Needs Assessment led by social consultants StratejiCo. The Community Needs Assessment aims to:

- Identify community needs and priority development concerns in consultation with Local Communities, NGOs and government bodies as well as other relevant stakeholders;;
- Understand the local development context in terms of existing and planned development projects, local and regional development actors, and institutional capacity;
- Identify gaps and opportunities for the Project to create beneficial and sustainable outcomes;
- On the basis of the above, identify a suite of short, medium and long-term projects that can be implemented under the Community Investment Programme that will be subjected to a prioritisation and selection process with community stakeholders.

The Community Needs Assessment focused on identifying community needs and potential investment opportunities aligned with the thematic areas of the Community Investment Programme: Environmental Stewardship; Economic Development; Community Health, Safety and Well-being; and Cultural Heritage Stewardship (refer to Section 5.5.1 for further information).

A range of meetings were undertaken to develop the Community Needs Assessment at both local and regional level comprising one-on-one interviews and focus-group meetings. Meetings undertaken in November 2017 primarily focused on data collection, whilst meetings undertaken in December 2017 focused on needs prioritisation and project identification for both sectoral issues and cross-community issues (refer to Table 4-6below).

Table 4-6 Community Needs Assessment meetings

Category	Stakeholder	Date	Location
<i>Data Collection Meetings</i>			
Local Community	Kiyikoy Animal Sellers	November 2017	Kiyikoy
Business and Business Associations	Hotels and pensions in Kiyikoy	November 2017	Kiyikoy
Business and Business Associations	Kiyikoy and Vize Tourism Association	November 2017	Kiyikoy
Land Users	Kiyikoy representatives of Kırklareli Water Buffalo Union	November 2017	Kiyikoy
Community Services and Infrastructure Providers	Vize Public Education Centre	November 2017	Vize
Community Services and Infrastructure Providers	ISKUR (Employment Agency)	November 2017	Vize

Category	Stakeholder	Date	Location
Community Services and Infrastructure Providers	KOSGEP (Small and Medium Sized Industry Development Organisation)	November 2017	Vize
Community Services and Infrastructure Providers	Thrace Development Agency	November 2017	Vize
Other	Tourism Agencies	November 2017	Istanbul
Other	Dairy and meat producers	November 2017	Kirklareli Province
Other	Timber workshops on Bahcekoy	November 2017	Bahcekoy
Marine Area Users	Guzelce Fishing Cooperative	November 2017	Istanbul
Business and Business Associations	Kiyikoy Cattle Breeders	November 2017	Kirklareli
Business and Business Associations	Kirklareli Beekeepers Union	November 2017	Kirklareli
Business and Business Associations	Sheep Breeders Union	November 2017	Kirklareli
Local Government	Kiyikoy Forestry Directorate	November 2017	Kiyikoy
Regional Government	Vize District Sub-Governorship	November 2017	Vize
Regional Government	Demirkoy Forestry Directorate	November 2017	Demirkoy
Regional Government	Kirklareli Provincial Directorate of Culture and Tourism	November 2017	Kirklareli
Regional Government	Kirklareli Provincial Directorate of Food, Agriculture and Livestock: Department of Animal Husbandry	November 2017	Kirklareli
<i>Focus Group Meetings and Interviews – For Needs Prioritisation and Project Identification</i>			
Land Users	Kiyikoy Beekeepers	November 2017	Kiyikoy
Marine Area Users	Kiyikoy Fishing Cooperative	November 2017	Kiyikoy

Category	Stakeholder	Date	Location
Community Services and Infrastructure	Kiyikoy Health Clinic	November 2017	Kiyikoy
Community Services and Infrastructure	Kiyikoy Emergency Clinic	November 2017	Kiyikoy
Local Government	Kiyikoy Municipality	December 2017	Kiyikoy
Community Representatives	Kiyikoy Muhtars	December 2017	Kiyikoy
Business and Business Associations	Kiyikoy and Vize Tourism Association	December 2017	Kiyikoy
Local Community	Disabled residents	December 2017	Kiyikoy
Local Community	Women	December 2017	Kiyikoy
Local Community	Youth	December 2017	Kiyikoy
Community Services and Infrastructure	Kiyikoy Schools	December 2017	Kiyikoy
Business and Business Associations	Restaurant Owners	December 2017	Kiyikoy
Land Users	Kiyikoy Cattle Breeders	December 2017	Kiyikoy
Land Users	Kiyikoy representatives of Kırklareli Water Buffalo Union	December 2017	Kiyikoy
Traffic-Affected Communities and Receptors	Güngörmez residents	December 2017	Güngörmez
Traffic-Affected Communities and Receptors	Bahçeköy residents	Planned January 2018	Bahçeköy
Local Community	Roma Population	Planned January 2018	Kiyikoy

Category	Stakeholder	Date	Location
Local Community	Kiyikoy Agricultural Development (Forestry) Cooperative	Planned January 2018	Kiyikoy

The Community Needs Assessment will be completed in January 2018 and will form the basis of further meetings with Local Communities to develop the Community Investment Programme for the construction phase (refer to Section 5.5.2 for further information).

4.6 Appointment of Community Liaison Officer, August 2017

The Project appointed a Community Liaison Officer (CLO) in August 2017. The CLO will be based in Kiyikoy during construction and is responsible for liaising with local residents and other interested or potentially affected stakeholders in order to maintain a consistent dialogue on Project activities and progress. He also supports the identification, investigation and resolution of issues or grievances that arise from Project activities.

The hiring of the CLO in advance of construction was important in terms of establishing a more permanent community presence and focal point to manage the interface between local residents and community representatives once construction activities are underway. The CLO maintains a regular channel of communication with local authorities and community representatives through phone calls and frequent meetings, to keep them updated about Project activities and to receive feedback on community issues and concerns related to the Project.

4.7 Project Information Meetings, July – October 2017

A series of Project Information meetings have been undertaken with specific stakeholder groups in Kiyikoy to present information on the technical details of the Project and its approach to environmental and social management, including targeted information with regard to the management of impacts on fishing, tourism, forestry, animal husbandry, stakeholder engagement and the community investment programme. The aim of these meetings was to relay Project information to a wider audience in Kiyikoy than had hitherto been targeted.

Information was presented by Project representatives with the aid of a PowerPoint presentation, with time allocated for stakeholders for Q&As.

The first meeting was held in the Kiyikoy Municipality, with various community representatives attending: Kiyikoy Mayor and municipal officials; muhtars; representatives of the Kiyikoy Fishing Cooperative, Forestry Cooperative, Kiyikoy and Vize Tourism Association and animal husbandry.

Further meetings were held in the Kiyikoy Resort Hotel with specific stakeholders groups (presented in Table 4-7) and followed the same format. All meetings were organised via relevant community representatives who were asked to inform their members and bring them to the meetings, with the exception of the meeting with women whereby informal contacts had to be

established with women in the community through regular engagement as they are not collectively organised.

Table 4-7 List of project information meetings

Stakeholder	Date	Number of people
Joint meeting with community representatives:	26 July 2017	10
<ul style="list-style-type: none"> • Kiyikoy Municipality • Kiyikoy Muhtars • Kiyikoy Agricultural Development (Forestry) Cooperative • Kiyikoy Fishing Cooperative • Kiyikoy Animal Husbandry Cooperative • Kiyikoy and Vize Tourism Association 		
Kiyikoy Fishing Cooperative: Large vessels operators	26 July 2017	15
Kiyikoy and Vize Tourism Association	26 July 2017	5
Kiyikoy tourism operators		
Kiyikoy Fishing Cooperative: Small vessel operators	27 July 2017	17
Kiyikoy Restaurant owners	09 August 2017	2
Kiyikoy Animal Husbandry members	09 August 2017	16
Kiyikoy Youth (14-17 years old), mixed gender	21 October 2017	12
Kiyikoy Roma group	22 October 2017	6
Kiyikoy Women	22 October 2017	18

Figure 4-3: Project Information Meeting with women in Kiyikoy, October 2017



Figure 4-4: Project Information Meeting with youth (14-17 years old) in Kiyikoy, October 2017



Whilst the meetings were generally positive in terms of expanding the level of engagement in the community and increasing the level of information about the Project, a number of concerns in

relation to impacts on livelihoods were discussed. A summary of the main issues and concerns relayed by stakeholders is summarised in Section 4.12, with responses provided.

4.8 Introductory meetings with Bahcekoy and Gungormez Local Community, August – October 2017

As both Güngörmez and Bahceköy villages will be affected by Project traffic during the construction phase of the Project, meetings have been held with the muhtars of both villages. The meetings have included an initial introductory meeting conducted by StratejiCo in August 2017 to introduce the Project and a follow-up meeting in October 2017 in which Project representatives attended to inform them about expected traffic impacts and proposed traffic measures to be implemented, based on Project experience of traffic measures implemented for the construction phase of the Russian Sector.

Information was collected on existing traffic issues in relation to both communities and potential issues to be considered during the construction phase including measures to minimise or mitigate traffic impacts. The feedback received was considered in the context of a traffic assessment conducted in December 2017 and which will be used to inform the Project's Traffic Management Plans.

Wider engagement with the Local Communities of Bahcekoy and Gungormez is planned to occur in early 2018, prior to the start construction phase (refer to Section 5.2.2 for more information).

4.9 Blue Stream Visit, August 2017

On 21 August 2017, a 3-day trip was organised for Kiyikoy stakeholders to visit Samsun to see the Blue Stream pipeline receiving terminal located in Durusu, and to meet stakeholders in Samsun who were familiar with of the construction and operation of the Blue Stream project.

The Blue Stream receiving terminal is a comparable, albeit smaller facility, to the TurkStream receiving terminal in Kiyikoy. The open-cut shore-crossing technique used for the Blue Stream pipeline is also comparable to the shore-crossing technique that will be used in Kiyikoy. Therefore, the trip was intended for Kiyikoy stakeholders to learn more about the TurkStream project and learn about the experiences of Samsun stakeholders to the Blue Stream project.

In total, 12 participants from Kiyikoy attended the visit, including the Mayor and Municipal officials, two of the three muhtars, representatives of the Kiyikoy Fishing Cooperative management board, a representative of the Kiyikoy and Vize Tourism Association, and a representative of the Kırklareli Water Buffalo Union.

The visit included meetings with the following stakeholders in Samsun:

- Meeting with representatives of Hurriyet Mahallesi Fishing Cooperative, who operate closest to shore crossing of the Blue Stream pipeline in the nearshore. This meeting included a visit to the nearshore Blue Stream pipelines route;
- Meeting with BOTAS Branch Manager and accompanying tour of the Blue Stream receiving terminal facility;

- Meeting with Durusu Muhtar and a group of residents. Durusu is the closest village to the Blue Stream receiving terminal, located approximately 1.5 km to the southwest; and
- Meeting with the Head of the Samsun Fishing Cooperative.

The visit was positive in terms of an information sharing exercise. The Hurriyet Mahallesi and Samsun fishermen who were met confirmed that they had similar concerns prior to the Blue Stream project as Kiyikoy fishermen; however they did not experience any negative impacts during construction and continue to fish and trawl as they had previously since the installation of the pipelines in the nearshore with no noticeable impacts on their fishing techniques or fish stocks in the area.

The visit to the Blue Stream receiving terminal and discussions with the BOTAS branch manager was positive in terms of understanding more about the operation of the facility. Stakeholders were informed about and could see for themselves the safety and security measures of the facility, the reinstatement of the shore-crossing and the pipeline Right of Way, the continued use productive use of land around the facility and that noise and emissions on site were minimal. The aim was to assuage concerns about the impact of a similar facility in Kiyikoy.

Lastly, the Durusu muhtar and residents, who are located closer to the Blue Stream terminal than residents in Kiyikoy, confirmed that they did not experience noise or odours, nor did they experience adverse impacts during construction. The residents were fairly neutral about Blue Stream, as they added that the project also did not meet their expectations in terms of bringing benefits to the area.

Figure 4-5: Visit to Blue Stream Receiving Terminal in Durusu, Carsamba, Samsun, with stakeholders from Kiyikoy, August 2017



Nevertheless, although the information-sharing was generally positive, the participants in Kiyikoy continued to have general concerns about the visual impact of the Receiving Terminal and

whether it could be seen from the town and the potential impact of the downstream project in terms of the land acquisition process.

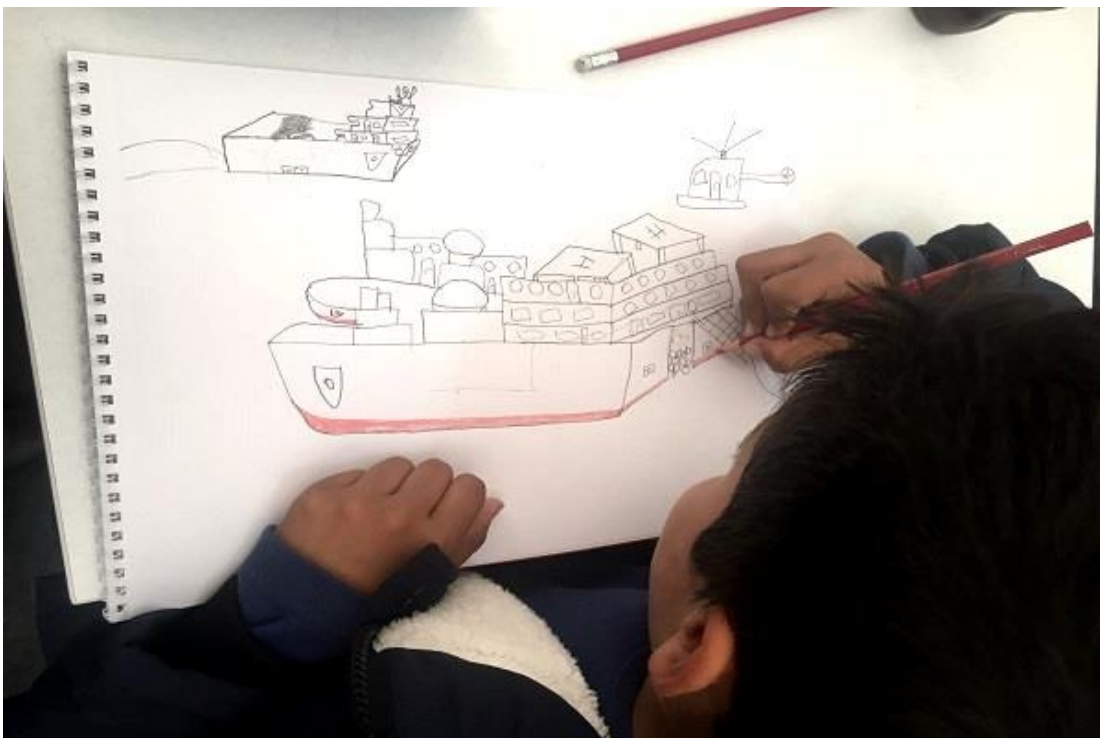
4.10 Kiyikoy Open Day Event, November 2017

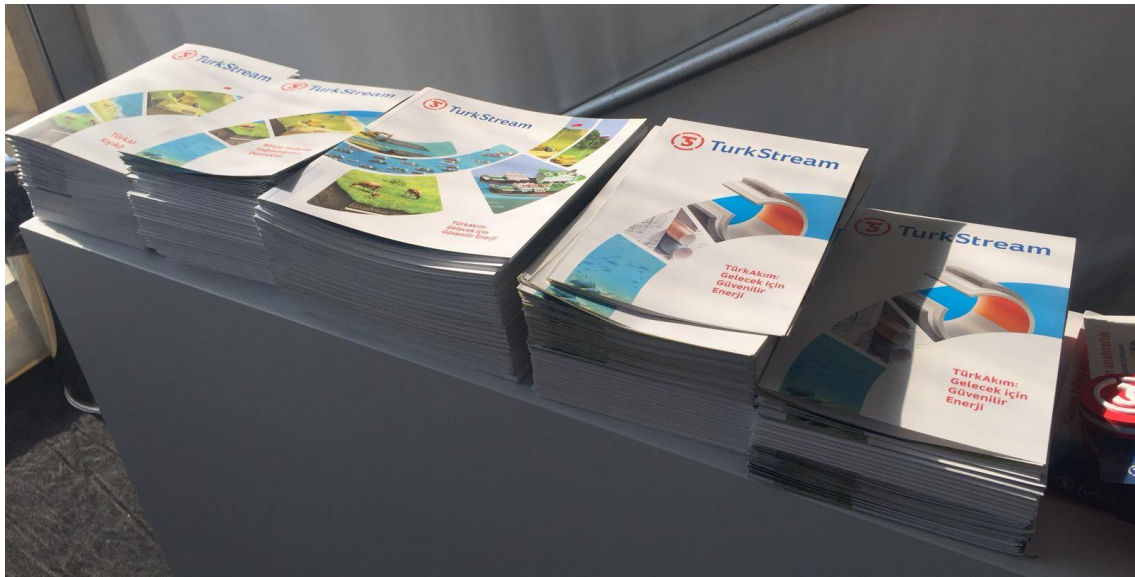
An Open Day event was arranged on Sunday 12 November at the wedding hall in Kiyikoy, from 11.00 – 16.00. Announcements regarding the event were made 3 days prior to the event via word of mouth, with the CLO informing community representatives about the event. Public announcements were also made on the morning of the event via the Municipality public speaker system in the town.

The objective of this event was to give the opportunity to members of the local community to learn about the Project. Community members were able to meet experts, ask questions and receive answers about the Project and its expected impacts. Visual materials, including maps, posters, Project videos, PowerPoint presentations and interactive presentations hosted on ipads were also made available at the event, and written materials including brochures and leaflets were also made available.

Figure 4-6: Photos of Kiyikoy Open Day Event, November 2017







Refreshments were also provided to people who attended, and a bouncy castle was arranged for children to encourage the participation of parents. Colouring books, papers and crayons were also provided to children to keep them entertained.

The set-up of the venue and the format of the meeting was designed to make the Project as visual and interactive as possible and to create a more relaxed atmosphere for residents to learn about the Project at their leisure and interact with Project representatives.

Comment forms and a secure comment box were made available at the venue so that community members could submit written comments about the Project. In addition, a stakeholder exit survey was conducted to gather people's view on the event, the Project and gather information on potential community investment projects that they would like to see in Kiyikoy.

Although no official count of the number of participants was taken, it is estimated that approximately 450 people from Kiyikoy attended the event, including children. 19 written comments forms were submitted and 41 participants responded to the stakeholder exit survey.

The feedback received from residents was overwhelmingly positive in terms of the presentation of the event, the materials handed out and displayed and level of information shared by Project representatives. Residents shared a number of concerns related to impacts on the community and livelihoods, as well as expectations of jobs, gas, and other benefits, and Project representatives provided responses in terms of explaining the Project, measures to address impacts and the expected benefits of the Project.

4.11 Other Engagement Activities

In addition to the engagement activities outlined above, since the start of the Project in 2015 and ongoing through to 2017, the Project had held meetings and other communications with a broad spectrum of stakeholders, both as part of official regulatory procedures and on a more informal basis. Regular engagement has occurred with relevant authorities in terms of defining, completing and implementing various permitting procedures. Ongoing engagement has also occurred at local community level, through social consultants Stratejico and the CLO, in order to maintain an

ongoing and regular flow of information and to maintain relationships. Additionally, a number of stakeholders have been engaged to accommodate changes of political and institutional representatives, in order to maintain relationships with the institutions.

4.12 Overview of Stakeholders Comments and Suggestions

Through Table 4-8, this section summarises the main comments and concerns raised by stakeholders during the engagement activities described above, with an explanation of how these comments have been considered or responded to in the context of Project development.

Table 4-8 List of the main concerns and comment from local stakeholders relative to the Project

Comments	Consideration and Responses
<i>Project Design and Location</i>	
Concerns regarding the choice and process of landfall selection in Selves	<p>The selection of Kiyikoy as the landfall location was taken as a result of extensive preliminary research across the shores of the Thrace region and decided on the basis of the findings of technical and economic feasibility studies.</p> <p>In response to concerns raised by the local community, extensive research was conducted to determine the most suitable landfall location within Kiyikoy in consultation with BOTAS, and in terms of geological specifications and general feasibility.</p> <p>Geological feasibility studies demonstrated that moving to the north or south of Kiyiköy was not feasible, therefore the only viable location for the Receiving Terminal was within the Selves area. However, it was possible to move the shore-crossing location further north to minimize impacts on Selves beach.</p> <p>Further information is provided in Chapter 4 of the EIA Report.</p>
Concerns in relation to impacts of the BOTAS downstream route.	<p>The onshore component of the TurkStream project is the responsibility of BOTAS. The downstream onshore pipeline route from the Receiving Terminal to the national grid at Lüleburgaz is in the process of finalization by BOTAS.</p> <p>An EIA Report in accordance with Turkish regulatory requirements will be undertaken by BOTAS for the onshore project.</p>
Concerns in relation to the duration of the construction	Pipelining in Turkish Exclusive Economic Zone waters started in Q3 2017.

phase (e.g. that construction will last between 3-4 years)	<p>Construction on land and for the shore-crossing will start in early 2018. The Project is planned to be in operation by the end of 2019. Therefore, the duration of construction in Kiyikoy is expected to last for approximately 18-24 months. This includes the construction of access roads for the Turkish landfall (ca. 3 months), land clearance (ca. 2-3 months), site preparation (ca. 6 months), shore-crossing construction (ca. 6 months), the construction and installation of the Receiving Terminal (ca. 18 months) and pipelaying in the nearshore (ca. 2 months). Please note that some activities will overlap and therefore the total duration will be shorter than the combination of these periods.</p>
Concerns regarding the extent of restrictions around Project facilities during operation (e.g. that existing land uses will be prohibited for a number of kilometres and the area around the receiving terminal will be closed to the public)	<p>During operation, the perimeter of the Receiving Terminal will be fenced for security purposes. This will be the only physical restriction in place.</p> <p>There will be safety restrictions on certain land developments around the Receiving Terminal:</p> <ul style="list-style-type: none"> • Safety Zone 1: Between 230 m – 410 m from Receiving Terminal, which prohibits all dwellings; • Safety Zone 2: between 390 m – 565 m from Receiving Terminal which allows 2 storey non-sensitive dwellings. <p>However, existing land uses and public access will not be restricted around the Receiving Terminal.</p> <p>The 31m Pipeline Right-of-Way (RoW) will restrict construction and the planting of deep rooted vegetation. There are no further restrictions outside of the Pipeline RoW.</p> <p>Offshore, there will be a 420m safety zone on the seabed around the pipeline. This will restrict seabed activities such as bottom trawling and anchoring, but vessel passage and other forms of fishing will not be restricted.</p>
<i>Environment and ecology</i>	
Concerns that the Receiving Terminal will pollute and impact the surrounding environment (e.g. through emissions, heating, consumption, etc).	<p>The Receiving Terminal is a facility that receives the gas incoming through the offshore pipeline, measures its volume, controls its temperature and pressure and relays it further into the onshore pipeline. It does not have any gas storage unit.</p> <p>Assessments conducted as part of the EIA Report have concluded that the Receiving Terminal and the Project will have minimal environmental impacts during the operational phase:</p>

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- Apart from a possible captive power generation facility, which would have a capacity of up to 5MW electricity, for consumption by the Receiving Terminal itself, it does not generate electricity and is not a power plant.
 - There will be some heaters within the Receiving Terminal, which are used to heat the gas in order to transmit it further. However, assessments have concluded that the Receiving Terminal will have no effect in terms of heating the surrounding environment.
 - There will be some routine maintenance several times per year, where gas will be released from vents at the top of the terminal, for short periods. The venting may be heard and the gas release may have a 'haze' effect that can be seen. However, the durations will be very short. There will also be generators and heaters within the Receiving Terminal which will release exhausts. There will be no burning or flaring of gas. Air quality modelling has been performed as part of EIA Report. The study concludes that air emissions will be within the limits defined by Turkish regulations and no air quality impacts are predicted which could affect the surrounding environment or human health.
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Concerns about the impacts on local terrestrial flora and fauna in Kiyikoy

Ecological surveys and assessments were undertaken as part of the EIA Report, which concluded that the majority of impacts will be temporary during the construction phase, and the Project will not lead to significant long-term environmental impacts.

The Project will result in a comparatively small area of habitat loss (70 ha) due to the clearing of land to allow for construction. Mostly oak woodland will be cleared to allow for construction. However, the EIA Report assess that the Project will not affect the integrity of the local habitat.

In addition to a small degree of habitat loss, birds and other animals may also be disturbed by noise and construction activities. These disturbances will affect slightly larger areas than habitat loss since noise can travel beyond the footprint of the construction area. As such, it is expected that birds and other species may choose to move away from the construction area while noisy activities are underway. However, there is an abundance of suitable habitat in the surroundings that can be used by these animals, which will move back into the Project area after construction has finished. Therefore, potential impacts related to noise and other disturbances are expected to be temporary and will

	<p>not cause any significant hardship for birds and other animals.</p> <p>Before construction starts, the valuable topsoil—including the seeds of natural plants in the area—will be conserved and used for future re-vegetation. Seeds of endemic species will be collected and submitted to the Turkish Seed Gene Bank in Ankara to minimise the Project’s impact on onshore flora and vegetation. Bulbs of the species <i>Lilium martagon</i> distributed along the streams of the pipeline route construction will also be collected and translocated to suitable habitats in areas that are not affected by the Project.</p> <p>The collection of the fauna species present in construction sites and classified as IUCN Endangered, Vulnerable and Near Threatened and their release into suitable habitats outside of the construction site was undertaken in November 2017 under the supervision of a specialist biologists.</p> <p>Trees will be replanted in all temporary construction areas. However, vegetation in the area directly over the pipeline will be limited to grasses and shrubs, as the deep roots of trees could damage the pipes. The size of the Project footprint has been minimised to reduce the number of trees that need to be cut.</p>
Concerns about the size of total Project landtake the number of trees that will be cut by the Project	<p>The total land take for the construction of the Project is approximately 70 ha, less than 0.1% of the overall forest land in Kiyikoy. The permanent land take will be 27 ha, which comprises the area of the Receiving Terminal. Temporary construction areas will be reinstated after construction is completed.</p> <p>The EIA Report calculates that approximately 57,000 trees will be cut by the Project, of which about 33,000 trees will be removed from the permanent Project footprint.</p> <p>Trees will be replanted in all temporary construction areas. Moreover, the Project has commissioned a study to be undertaken by Istanbul University to calculate the offset ratio to compensate tree loss in permanent construction areas. Based on the current understanding of the available forestry area in Kiyikoy, it is unlikely that the trees replanted to compensate permanent tree loss could be replanted in Kiyikoy, although they may be replanted within Vize district.</p>
Comments that water reservoirs will be impacted by the Project.	<p>The EIA Report includes a careful analysis of the water sources and the possible impacts on these reservoirs. The</p>

Project itself does not interfere with adjacent water reservoirs and the location has been chosen with all relevant safety distances from water resources in mind.

The pipelines will cross Sazlidere Stream in Kiyikoy downstream of the water reservoirs; therefore there is no risk of impacts to the reservoirs. In addition, the crossing of the stream will be the subject of detailed design, which will ensure the impacts are minimised and that the stream is effectively reinstated. Potential impacts on surface water and groundwater during the construction phase will be mitigated through careful measures during construction. For example, there will be measures to prevent any spills of fluids from machinery during construction, spill kits will be kept in accessible locations at all times and employees will be trained in spill response. Activities in close proximity to drains and soil storage areas will also be restricted.

Fish and Fisheries

Concerns about the impacts on fish and fishing during construction and the potential loss of income for fishermen due to reduced fish catch

The Project commissioned a Fishing Study in response to concerns raised by fishermen in Kiyikoy. The study has concluded the following:

- During the construction phase the most significant impact will be on the inshore fishers as a result of the restricted area put in place around the nearshore construction area;
 - The restricted area will be 500 m either side of the trench, for a duration of approximately 6 months. Based on the current schedule, it is anticipated that this will occur during the most intense fishing season (September – December);
 - The impact will occur in north Selves fishing grounds, identified by inshore fishers as the most important, forcing them to relocate to other areas, further away or less productive;
 - Impacts may also occur because nearshore construction activities will occur for 24 hours, and the resultant lighting from vessels and on the beach may impact night-time fishing activities. Night-time fishing techniques rely on complete darkness;
 - There will also be some disturbance to the fish habitat due to the dredging activities. The area off Selves beach has been identified as a spawning ground for some of the key commercial species, including whiting and turbot. However, according to EIA studies the plume from the dredging will be localised and the dredging
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operation itself is short term, scheduled to be no more than 3 months, so any impact on fish is likely to be low and short term. It is expected that the spawning habitat will recover after the nearshore construction activities.

Given the envisaged impacts, the Project has committed to the following mitigations:

- The Project will aim to coordinate nearshore construction activities to minimise duration of restrictions;
- As it is likely the Project will impact inshore fishing activities during nearshore construction activities, the Project will endeavour to reach a consensus on the specifics of the envisaged impacts with the Fishing community in Kiyikoy and agree on a methodology and mechanism for providing compensation for economic loss for fishermen affected by Project activities.
- The Project will put in place monitoring, including of dredged material, during construction to check that further impacts do not arise, and that all impacts are addressed;
- There will be a grievance (complaints) procedure during construction, which can be activated in the event individual fishermen claim additional loss of catch. This will include recourse to the compensation mechanism if claims of further loss of catch can be substantiated.
- Unrelated to the above impacts, the Project will seek to support the fishing industry in Kiyikoy through the Community Investment Programme.

Further details on the expected impacts to Kiyikoy fishing will be included in the Fishing Study.

Comments relating to impacts on fish spawning areas and migratory routes in Selves

The EIA Report and the MRAG Fishing Study concluded that there will be no permanent adverse effects to fish migration or fish spawning.

There may be some temporary effects as a result of dredging on the rocky outcrop which is recognised to be a local spawning area for fish. However, the plume from the dredging will be localised and the dredging operation itself is short term, scheduled to be no more than 3 months, so any impact on fish is likely to be low and short term. The sediments that will be disturbed are uncontaminated, so this activity will not release any new chemicals to the

	<p>environment. It is expected that the spawning habitat will recover after the nearshore construction activities.</p> <p>Nearshore construction activities may disturb fish causing them to avoid the area immediately around construction activities. However, they will soon return to their usual migration routes.</p> <p>Further details on the expected impacts to Kiyikoy fishing will be included in Fishing Study and are also available in the EIA Report.</p>
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<p>Concerns about the long-term impacts on fish and fishing due to the presence of the pipeline and the 420m safety zone around the pipeline, including concerns about potential impacts on rapa whelk (sea snail) fishing which requires nearshore anchoring.</p>	<p>During the operational phase, the main impact will be due to the operational safety zone of 420 m around the pipeline which will restrict bottom trawling and anchoring.</p> <p>Fishermen will need to adjust their fishing techniques, in order to avoid damaging their fishing gear. There will be some initial impact on the fishers as they adapt their fishing strategy to account for the restricted area, however, this should have no long-term effect on their catches.</p> <p>The pipeline itself is suitably insulated to prevent or reduce any significant noise. Moreover, it will be buried under the seabed to a depth of around 2 m for the first 2.5 km. Adverse impacts on fish behaviour of the pipeline are unexpected. On the contrary, experience from similar subsea pipeline projects across the world, including Blue Stream, indicates the opposite – fish tend to congregate around pipelines as they act as a substrate for algae to form.</p> <p>Further details on the expected impacts to Kiyikoy fishing will be included in Fishing Study which will be disclosed in Q1 2018, and are also available in the EIA Report.</p>
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Lumbering Activities, Animal Husbandry and Beekeeping

<p>Comments that the Project will impact lumbering livelihoods in Kiyikoy, causing incomes to fall</p>	<p>The total land take of the Project is less than 0.1% of the overall forest land in Kiyikoy. As such, it is not expected that there will be significant impacts on the long-term functioning of the forestry industry in Kiyikoy.</p> <p>Nevertheless, the Project will work closely with the local Forestry Directorate and local Kiyikoy Agricultural Development (Forestry) Cooperative to identify measures to minimise the impact of forestry activities. Measures include the following:</p> <ul style="list-style-type: none"> • The Project will work with the state Forestry Directorate and Kiyikoy Agricultural Development (Forestry)
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	<p>Cooperative to enable local forestry workers to benefit from tree-cutting activities required for the Project;</p> <ul style="list-style-type: none"> • The Project will work with the Cooperative and Directorate to put in place, as much as possible, safe access to other tree felling areas during all Project phases; • The Project will investigate possibilities to work together with and assist the Forestry Directorate with future forestry management; • The Project will reinstate all areas only required on a temporary basis during the construction period.
Comments that the timber from Project tree-cutting activities should be given to local forestry workers and / or the local community	<p>Responsibility for the timber proceeds of tree-cutting is decided by the relevant State Forestry authorities in accordance with Turkish regulations. Therefore, the Project cannot influence these decisions.</p>
Concerns that the Project will have long-term impacts on grazing areas and grazing lands used by animal husbandry	<p>The permanent loss of land will be limited to the Receiving Terminal (27 ha). Consultations with animal husbandry members using the area to date has established that the Receiving Terminal is within their grazing areas, there is sufficient additional land around the Receiving Terminal where animals can continue to graze. Therefore long-term impacts are expected to be minimal.</p> <p>Impacts on surrounding grazing lands during construction will be temporary and will be minimised by measures such as dust suppression. No long-term impacts on grazing lands are expected during the operational phase, and temporary construction areas will be reinstated after construction.</p> <p>During operations, there will be no restrictions imposed around the Receiving Terminal that would prevent access by animal herds.</p>
Concerns that the Project will impact access to grazing areas and water sources used by animal husbandry during construction, that will impact their livelihoods	<p>Access routes to grazing areas and water sources used by animal husbandry around Selves and to the south of Kiyikoy will be temporarily affected during construction.</p> <p>Consultations are ongoing with animal husbandry members to minimize impacts on their access routes through design and traffic management measures, and to ensure the safety and security of their livestock.</p> <p>Where severance of access routes to grazing areas or water sources cannot be avoided, the Project is consulting with animal husbandry to identify alternatives measures to be</p>

implemented to compensate for the temporary loss of access to grazing areas and water sources.

Concerns about the impact on beehives located close to Project activities and potential impacts on livelihoods in the form of reduced honey production and income for beekeepers.

Beehives situated close to Project construction areas, or traffic routes, could be affected by our construction activities. Individual beekeepers have been consulted in view of relocating at risk beehives to alternative locations in advance of construction, to ensure that their beekeeping livelihoods are not impacted. Monitoring will occur with other beekeepers during construction to ensure that they have not been impacted.

After construction, beekeepers who have been relocated will have the option to return to their original location as the Receiving Terminal is not expected to have any impacts on beehive production.

Tourism

Concerns about impacts on Selves beach, including impacts on water quality during construction

The decision to move the shore-crossing location further north was taken with consideration of minimizing impacts on Selves beach in mind.

The immediate beach area around construction activities will be temporarily closed for health, safety and security reasons. In addition, as a precautionary measure there will be temporary restrictions on activities such as swimming and boating whilst construction vessels are operating close to the shore, to ensure the health and safety of the public. These activities are only expected to last for a short period of time. Notices to beach users will be erected accordingly.

The remainder of Selves beach will remain accessible to the public throughout the construction phase, although visitors to the beach may experience some temporary disturbance from construction activities, such as noise and dust, during construction on the beach. The Project will implement measures to try to minimise such impacts as far as possible.

There will be increased turbidity during dredging activities. Assessments performed as part of the EIA indicate that the sediment plume will not extend beyond 165 m of the dredging activities, so will remain within the area that will be closed for swimming. Visual impacts as a result of increased turbidity are therefore not expected, neither will pose any health risks to swimmers. Furthermore the impact is expected to be short-term and temporary, with the sediment plume dispersing soon after dredging activities are completed.

	<p>After construction, the beach area will be restored to its original condition and there will be no further temporary or permanent restrictions on the use of the beach or on swimming.</p> <p>The other beaches in Kiyikoy – the Municipal beach and Liman beach next to the port – will be unaffected by Project activities.</p>
Concerns about the visual impact of the Receiving Terminal and the long-term impact this could have on Kiyikoy's tourism industry	<p>A Visual Impact Assessment was performed as part of the EIA Report which modelled what the Receiving Terminal would look like from different viewpoints in Kiyikoy.</p> <p>The assessment confirmed that the Receiving Terminal will be visible from some vantage points, including hotels, restaurants and residences located on the north side of Kiyiköy with a view towards Selves Beach and its surrounding area. The Receiving Terminal will not be seen from the beach.</p> <p>Measures to limit the view of the Receiving Terminal will be included in its design and implemented. Trees will be planted in those areas that were only temporarily required for the construction phase. In addition, the Project is investigating options for the erection of 'green screening / fencing' around the facility. The objective is to limit the view of the Receiving Terminal from Kiyikoy town itself to only the two vent stacks which will be 30 m high. Due to the power generation windmills in the area, it is expected that the vent stacks will not impose any further visual impediment to the area.</p>
General concerns that the Project could have a long-term impact on Kiyikoy's tourism industry	<p>The Project is committed to minimizing impacts during construction and operations as far as possible through design and mitigation measures. Impacts during the construction phase will be temporary and appropriate measures will be taken reduce construction related impacts such as noise, dust and emissions.</p> <p>After construction, all temporary construction areas will be reinstated, with consideration of the original land contours, and can be returned to their original uses.</p> <p>Furthermore, the Project aims to support the development of the tourism industry in Kiyikoy through the Community Investment Programme and are consulting the local community to identify opportunities and projects in which to do so.</p>

Traffic

Concerns about traffic related impacts, including noise, vibration, dust, reduced access and congestion, and health and safety risks for roads users and pedestrians.

These concerns have been raised in particular by stakeholders in the traffic-affected communities of Bahcekoy and Gungormez

How will local communities be affected by land acquisition? How will the Company compensate the loss of lands?

As stated in the EIA Report, construction traffic is estimated to peak at 550 heavy-good vehicle movements per day for a period of approximately 10 months, after which it will gradually reduce.

Feedback received from stakeholders to date regarding traffic has been considered in the context of a traffic assessment conducted at the end of 2017 and which will be used to inform the Project's Traffic Management Plan.

Potential measures to minimise and mitigate traffic impacts include:

- Scheduling traffic movements to avoid sensitive periods;
- Watering roads to suppress dust;
- Traffic monitoring and strict enforcement of compliance with traffic procedures, e.g. speed limits.

In addition to these proposed measures, there will be a Grievance Procedure in place in which community members can contact the Project in the event they experience impacts as a result of construction traffic or notice traffic violations by the Project traffic (see Section 7.1.2 for more information about the Grievance Procedure).

The Project will seek to validate and agree the proposed traffic mitigations measures which are informed by the traffic assessment. Moreover, additional safety measures at community level will also be discussed (see Section 5.2.2 for more details).

Other Community Related Issues

Comments relating to whether the local community benefit from employment and procurement opportunities from the Project?

Most of the personnel who will work during landfall construction will be supplied by a construction contractor. It is anticipated that the maximum number of workers during the peak of landfall construction will be 600 workers. Many of the construction positions will require specialised skills and qualifications, so the number of local employment opportunities will be limited.

Where practicable, the Project will encourage the use of local labour for the Project including by requiring contractors to advertise suitable available positions in local and regional media, use local recruitment agencies and provide

	<p>opportunities for local people to access employment opportunities created by the Project.</p> <p>Construction contractors must advertise suitable positions within the local community and submit reports on the number of applications, people recruited, etc, as well as any measures they are taking to encourage local employment. This process will be monitored and, where practicable, the Project will encourage contractors to recruit local staff for positions that emerge.</p> <p>Similarly, there may be some local procurement opportunities for goods and services such as cleaning, catering, security and local accommodation. These contracts will be managed by the construction contractor. Where practicable, the Project will encourage our contractors to choose local providers for procurement of goods and services for the Project.</p> <p>As the economic benefits of local employment and procurement are expected to be limited, the Project will seek to make a positive contribution to the social and economic development of Local Communities via the Community Investment Programme (see Section 5.5 for further information.)</p>
Comments to the effect that the Project should compensate for economic losses or impacts on livelihoods incurred as a result of Project activities	<p>The Project has developed a Compensation Management and Livelihood Restoration Framework to guide the evaluation and determination of compensation and livelihood restoration measures.</p> <p>The Compensation Management component of the Framework will capture the process and requirements for assessing compensation claims and implementing compensation measures. Compensation measures may include financial compensation or in-kind contributions.</p> <p>The Compensation Management and Livelihood Restoration Framework will be closely tied to the Grievance Procedure (see Sections 7.1.2 and 7.1.3). As part of the process of implementing the Framework, the Project will work with the affected stakeholders in order to identify appropriate compensation or restoration measures.</p>
Concerns related to Project land acquisition procedures	<p>The Receiving Terminal, onshore pipeline route, shore-crossing and temporary construction areas are all located within state land, either forestry or Treasury. No private lands will be affected.</p>

However, some road upgrades and widening is needed to allow heavy vehicles to access the landfall area. This will require the temporary land acquisition of some private land along the access route in order to widen the road; in most cases it will only involve the temporary acquisition of a strip of land adjacent to the existing road.

Land acquisition will be handled by BOTAS in accordance with Turkish regulations. BOTAS will directly handle negotiations with and compensation of affected landowners.

Comments that Local Communities should benefit from the supply of natural gas	The Project is not responsible for the delivery of natural gas into the market. After the Receiving Terminal, the first onshore pipeline developed by BOTAS will carry gas to Luleburgaz from where it will be directed into the national gas grid. The relevant Turkish authorities are then responsible for all decisions regarding the distribution of gas for the internal market. The second onshore pipeline will deliver gas to Europe.
Concerns that the Project is related to other proposed natural gas energy developments in the area, including a proposed thermal gas power plant that is proposed by Zorlu Energy.	The Project has no relationship to the proposed Zorlu or any other energy developments and has no information about such projects other than what is in the public domain.

The Project takes its environmental and social responsibility seriously. Several assessments have been undertaken to identify potential impacts, avoid them, and develop appropriate mitigation measures where necessary. If impacts cannot be mitigated, the Project will work with affected stakeholders to offset or compensate impacts, or identify alternative measures which are appropriate for them. During construction and operations, monitoring will be undertaken in order to detect if any impacts occur outside predictions, or higher than predicted. In this event, the Project will take additional measures to minimize the impacts.

The Project will engage with local communities prior to and during the construction process, so that they are informed about Project activities and potential impacts and mitigation measures. There is also be a Community Liaison Officer present in the community representing the Project for all discussions with local communities and residents.

A Grievance Procedure has been developed and the community will be informed about the Grievance Procedure prior to the start of construction activities. Through this procedure, local residents will be able to send their grievance to the Project so that they can be can address them in an appropriate and timely way, following a standard procedure of investigation, analysis, and resolution. It will also ensure that resolutions are documented and communicated to the people

involved. Engagement with people will continue up to and throughout construction, and further actions will be taken if people raise new concerns or issues that have not been identified.

Further information on both the upcoming engagement program and the Grievance Procedure can be found in the following sections of this report.

5 Overview of Planned Activities

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

Stakeholder engagement will continue over the life of the Project throughout the Construction and Pre-Commissioning, Operational and Decommissioning phases of the Project. The Project is committed to maintaining relationships and communications with stakeholders over this time.

During the Construction and Pre-Commissioning Phasethe emphasis of engagement shifts from seeking and incorporating stakeholder input in future plans, to consultation and disclosure about activities that are current or about to take place, and receiving feedback from stakeholders regarding ongoing activities. Planned engagement activities will be commensurate with the scale of impacts predicted in the EIA and additional environmental and social assessments.

Engagement activities during the Construction and Pre-Commissioning Phase will include:

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

An overview of the anticipated engagement materials and methods that will be disclosed up to the end of the Construction and Pre-Commissioning Phase of the Project is outlined in Table 6.1 below. Throughout this period, the SEP will be periodically updated, as appropriate, as needs and engagement activities evolve.

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

5.1 Summary of Upcoming Engagement Activities in Turkey

The main upcoming stakeholder engagement activity in Turkey is centred on pre-construction engagements and notifications between January – March 2018, in order to inform stakeholders about planned Project activities during construction and refine the mitigation measures that will be implemented during the construction phase. Planned engagement will also include meetings to inform stakeholders about the findings of the Community Needs Assessment and to agree on the Community Investment Programme projects to be implemented during the construction phase.

Once the construction phase commences, regular engagement will occur with local authorities and community representatives and other stakeholder groups to keep them informed to provide updates on Project progress. Targeted engagement will also occur as part of ongoing environmental and social monitoring.

Ongoing engagement and liaison with Turkish authorities is planned throughout 2018 with regards to permitting procedures, management plans, and all necessary aspects of coordination as construction activities progress.

Beyond the planned engagement activities outlined above, the Company will continue to make it accessible for stakeholders to contact the company with regard to any questions, comments or issues they may have. Project reports and updates will also continue to be published on the Company website and relevant stakeholders will be directly notified as appropriate.

The anticipated timing of stakeholder engagement activities for the existing and future Project Phases are summarised in Table 5-1 and described below.

Table 5-1 Anticipated Timing of Planned Stakeholder Engagement Activities

Project Phase	Planned Engagement Activity	Anticipated Date
Pre-construction	Engagement with local authorities, community representatives and wider Local Communities to inform about the findings of the Community Needs Assessment and to develop and prioritise Community Investment projects to be implemented during construction	Q1 2018
Pre-construction	Wider disclosure of the Grievance Procedure and the Compensation Management and Livelihood Restoration Framework	Q1 2018
Pre-construction	Meetings in Bahcekoy, Gungormez, Saray and with access road households in Kiyikoy to discuss traffic mitigation measures to be implemented during construction	Q1 2018
Pre-construction	Meetings with Kiyikoy Fishing Cooperative and Kiyikoy Fishermen to inform them about the MRAG Fishing Study findings and to discuss and agree on a Protocol covering mitigation and compensatory measures during nearshore construction activities	Q1 2018
Pre-construction	Meetings with animal husbandry members to agree on mitigation and compensatory measures to be implemented during onshore construction	Q1 2018
Pre-construction	Engagement activities to inform Local Communities about potential employment and procurement opportunities on the Project and how to apply for them	Q1 2018
Pre-construction	Engagement meetings to inform community stakeholders to notify them about the start of	Q1 2018

Project Phase	Planned Engagement Activity	Anticipated Date
	construction activities, schedule, expected impacts and mitigation measures	
Pre-construction	Engagement with local authorities, community representatives and other relevant stakeholders regarding community health, safety and security measures during construction	Q1 – Q2 2018
Pre-construction	Opening of Kiyikoy Information Centre	Q1 2018
Pre-construction and Construction	Ongoing engagement with Cultural Heritage authorities as required.	Q1 2018 and ongoing throughout construction
Construction	Ongoing engagement and coordination with Turkish authorities for permitting, monitoring and other procedures prior and during construction	Q1 2018 and ongoing throughout construction
Construction	Schools Awareness Raising meetings & traffic safety meetings	Q2 2018 and then on a regular basis
Construction	Regular Interface Meetings with Local Authorities and Community Representatives	Q2 2018 and then on a Monthly / Quarterly basis during construction
Construction	Ongoing engagement for the Environmental and Social Monitoring Programme	Q2 2018 and then on a Monthly / Quarterly basis during construction
Construction	Project information, coordination and regular update meetings with marine authorities, fisheries and marine users on nearshore and offshore construction schedule, exclusion zones and movements of vessels	Q3 – Q4 2018
Construction	Project update meetings with targeted stakeholders	Q3 2018 and then on a Quarterly basis.
Construction	Stakeholder Engagement Plan: Update	Q4 2018
Construction	Annual Environmental and Social report(s)*	Q4 2018 / Q1 2019
Operation	On-going stakeholder engagement	From 2020
Decommissioning	On-going stakeholder engagement	From 2069

* Precise details to be confirmed

5.2 Pre-Construction Engagement, Q1 2018

5.2.1 Disclosure of the Grievance Procedure and the 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, and a non-technical leaflet explaining the Grievance Procedure has been distributed during the Kiyikoy Open Day and during meetings, refresher meetings will be held in Q1 2018 prior to the start of landfall construction activities.

The aim of these meetings will be to explain the Grievance Procedure in more detail and make people aware of how they can submit a grievance. Moreover, the meetings will serve to identify the best mechanism to make the Grievance Procedure more widely available within Kiyikoy, Bahcekoy and Gungormez, e.g. having community representatives act as conduits for grievances, setting up grievance boxes (if applicable), and distributed of the Grievance Procedure leaflet in local teahouses, etc.

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

It is envisaged that the following stakeholders will be engaged as part of this process:

- Kiyikoy Municipality;
- Kiyikoy, Bahcekoy and Gungormez muhtars;
- Heads and representatives from Kiyikoy Fishing Cooperative, Forestry Cooperative, Animal husbandry unions, the Roma Association, and the Kiyikoy and Vize Tourism Association;
- Kiyikoy Access Road Households;
- Teahouses, restaurants and cafes as well as markets and other shops that are identified in Kiyikoy, Bahcekoy and Gungormez that act as meeting spots.
- Vulnerable groups, including women, elderly, youth will be engaged directly or indirectly through community representatives.

5.2.2 Engagement regarding Traffic Management

Engagement meetings will be held to inform relevant stakeholders about the findings of the traffic assessment conducted at the end of 2017 and discuss traffic management measures. Feedback will be incorporated into the development of Construction Traffic Management Plans and implemented by the construction contractors. The discussions will also take into account any additional traffic safety measures to improve road and pedestrian safety along Project access roads and access routes.

The meetings will primarily focus on the communities of Bahcekoy and Gungormez, and will aim to target a wider-cross section of the community, as engagement with residents in these communities has been limited to date.

It is envisaged that the following stakeholders will be engaged as part of this process:

- 4 households located along Project access road in Kiyikoy
- Muhtars in Bahcekoy and Gungormez;
- Community service providers in Bahcekoy and Gungormez which may be sensitive receptors to traffic (schools, clinics, cemeteries, mosques);
- Businesses located along the main road in Bahcekoy and Gungormez;
- Residents who live along the main road in Bahcekoy and Gungormez;
- Animal husbandry owners and forestry workers in Bahcekoy and Gungormez;
- Saray Mayor;
- Saray Governor;
- Tekirdag Municipality;
- Road Administration.

5.2.3 Engagement with Kiyikoy Fishing Community to disclose Fishing Study and agree on Project mitigation measures

Meetings will be 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.

These meetings will also be used to inform the fishing community about the expected Project schedule, provide more details on Project activities, and explain the proposed mitigation measures. In particular, this will be an opportunity to discuss the mechanism for compensating any loss of catch incurred during the nearshore construction phase, including the mechanism for assessing claims, identification of potentially affected fishermen, and the mechanism for compensating both fishing vessel owners and fishing workers on the vessel.

5.2.4 Engagement will Animal Husbandry members to agree on Project mitigation measures

Meetings will be held with animal husbandry members both individually and in groups to agree on Project mitigation measures to protect livestock and manage impacts on their livelihoods. Animal husbandry members will be informed about the expected Project schedule and activities, plans regarding the potential fencing of construction areas and potentially access roads, provisions for safe access of herds, and proposed mitigations and compensation measures for severance or reduced access to grazing areas and water sources. The aim will be to reach agreement with each owner regarding the extent of impacts and proposed measures, in order for these to be implemented prior to the onset of spring season when livestock will tend to free-graze.

5.2.5 Engagement with Local Communities on Employment and Procurement Opportunities

In advance of construction phase activities commencing, the Project will liaise with construction contractors to develop a programme of activities to inform Local Communities about employment and procurement opportunities on the Project.

The aim will be to agree on how and where employment vacancies and procurement opportunities will be advertised, in consultation with local stakeholders, and to provide further information on the number and type of vacancies and procurement opportunities that may be available.

5.3 Construction Phase Engagement, Q1 2018 - 2019

5.3.1 Pre-Construction Phase Planning and Start of Construction Notifications

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

Given the overlap with the planned pre-construction stakeholder engagement activities outlined in Section 5.2 in terms of stakeholders that will be met, it is expected that some of the engagement activities will be combined.

Table 5-2 outlines the expected notifications and topics of interest that will be discussed with relevant stakeholders.

Table 5-2 Start of Construction Notifications and Coordination

Notification	Interested / Affected Stakeholders	Anticipated Date
Start of Onshore Construction Activities (Land preparation, Receiving Terminal Construction, Onshore Pipeline Construction), including information on Project schedule, activities, expected impacts and mitigation measures	<ul style="list-style-type: none"> • Kiyikoy Municipality • Kiyikoy Municipal Council • Kiyikoy Muhtars • Kiyikoy Fishing Cooperative • Kiyikoy Agricultural Development (Forestry) Cooperative • Kiyikoy and Vize Tourism Association • Kiyikoy Roma Association • Kiyikoy animal husbandry members and unions • Kiyikoy beekeepers • Kiyikoy Gendarmerie • Kiyikoy Forestry Directorate • Borusan Energy 	Q1 2018

Notification	Interested / Affected Stakeholders	Anticipated Date
	<ul style="list-style-type: none"> ISKI Vulnerable groups, as needed and appropriate Regional authorities and officials (Vize District Sub-Governor; Kırklareli Governor) Other local, regional and national authorities as applicable 	
Information about expected workforce numbers and accommodation arrangements	<ul style="list-style-type: none"> Kiyikoy Municipality Kiyikoy Municipal Council Kiyikoy Muhtars Kiyikoy Health Clinic Kiyikoy Emergency Unit Kiyikoy Gendarmerie Kiyikoy and Vize Tourism Association Accommodation and food service providers in Kiyikoy 	Q1 2018
Information provision and coordination of security and access arrangements around Construction areas	<ul style="list-style-type: none"> Kiyikoy Municipality Kiyikoy Muhtars Kiyikoy Gendarme Hunters in Kiyikoy Kiyikoy Forestry Directorate Borusan Energy ISKI Relevant authorities responsible for issuing hunting permissions Kiyikoy and Vize Tourism Association (including necessary coordination to inform trekkers) Kiyikoy Agricultural Development (Forestry) Cooperative Kiyikoy animal husbandry members and unions Kiyikoy Fishing Cooperative Vulnerable groups, as needed and appropriate 	Q1 2018
Information provision and coordination of Project workforce health and emergency arrangements	<ul style="list-style-type: none"> Kiyikoy Municipality Kiyikoy Health Clinic Kiyikoy Emergency Unit Kiyikoy Gendarmerie Hospitals and clinics in surrounding communities (e.g. Vize and Saray) Vize Health Director Kırklareli Health Director 	Q1 2018
Start of construction traffic movements, including information on Project	<ul style="list-style-type: none"> Kiyikoy Municipality Kiyikoy Gendarmerie Kiyikoy Schools 	Q1 2018

Notification	Interested / Affected Stakeholders	Anticipated Date
schedule, activities, expected impacts and mitigation measures	<ul style="list-style-type: none"> Bahcekoy community representatives and receptors (muhtars, schools, health clinic, businesses and residents along the main road, etc). Bahcekoy community representatives and receptors (muhtars, schools, health clinic, businesses and residents along the main road, etc) Animal husbandry members using Project access roads and routes Vulnerable groups, as needed and appropriate Saray Governor Saray Mayor 	
Start of construction activities on Selves beach, including information on Project schedule, activities, expected impacts and mitigation measures. In addition, coordination of community health, safety and security measures such as notices on the beach warning of restrictions	<ul style="list-style-type: none"> Kiyikoy Municipality Kiyikoy Gendarmerie Vize Sub-Governor Kiyikoy Muhtars Kiyikoy and Vize Tourism Association Accommodation and food service providers in Kiyikoy Camping operators in Kiyikoy Kiyikoy Fishing Cooperative Vulnerable groups, as needed and appropriate 	Q2 2018
Start of Nearshore Construction Activities, including information on Project schedule, activities, restrictions and expected impacts and mitigation measures.	<ul style="list-style-type: none"> Kiyikoy Municipality Kiyikoy Municipal Council Kiyikoy Muhtars Kiyikoy Fishing Cooperative Kiyikoy fishermen Other fishing cooperatives that operate in the Kiyikoy area National Union of Fishing Cooperatives (SUR-KOOP) Coast Guard Port Authority Kiyikoy Gendarme Kiyikoy and Vize Tourism Association Vulnerable groups, as needed and appropriate 	Q2 2018

Notification	Interested / Affected Stakeholders	Anticipated Date
	<ul style="list-style-type: none"> Regional authorities and officials (Vize District Sub-Governor; Kirklareli Governor) Other local, regional and national authorities as applicable 	

In addition to list of stakeholders that will be notified above, efforts will be made to engage groups that are not officially organised such as women and youth to ensure that they receive relevant information concerning the start of construction activities. It is also expected that relevant announcements will be made and reported in local and national media outlets.

Information materials will also be produced to support these notifications as necessary. With respect to planned construction activities on the beach and in the nearshore, the Project will also seek to identify an appropriate means to disclose relevant information on the beaches themselves, for the benefit of people using the beach.

5.3.2 Regular and Ongoing Project Updates

Engagement with interested and potentially affected stakeholders will continue throughout the construction period, to provide updates on Project progress and receive feedback from stakeholders on Project activities and the effectiveness of mitigation measures taken to mitigate environmental and social impacts.

For some stakeholders, more regular engagements may be planned at their discretion and may focus on particular issues which are of most interest to them. The frequency of engagement will also consider the schedule of Project activities, the scale of potential Project impacts, and its relevance to particular stakeholders.

It is foreseen that more regular Project update meetings will occur with the following stakeholders:

- Kiyikoy Municipality;
- Kiyikoy Municipal Council;
- Kiyikoy Muhtars;
- Kiyikoy Fishing Cooperative;
- Kiyikoy Agricultural Development (Forestry) Cooperative;
- Kiyikoy Forestry Directorate;
- Kiyikoy and Vize Tourism Association;
- Kiyikoy animal husbandry members and unions;
- Kiyikoy Gendarmerie.

5.4 Engagement Activities for ongoing Environmental and Social Management

Stakeholders will 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.

5.4.1 Environmental and Social Monitoring Programme

The Company has prepared an Environmental and Social Monitoring Programme (ESMoP) covering the construction period which is intended to verify the effectiveness of Project mitigation measures and that actual Project impacts are no greater than those predicted in the EIA Report and other assessments.

In the Turkey, the Project has committed to undertaking monitoring of various social and economic conditions in case the Project gives rise to any unanticipated social or economic changes within the Local Communities, and if so, to allow for the early identification of these changes and for corrective measures to be implemented. Some of these monitoring activities have an engagement component, summarised in Table 5-3 below.

Table 5-3 Planned Engagement Activities for the Environmental and Social Monitoring Programme

Monitoring Activity	Description	Method
Land Use Monitoring	Monitoring potential adverse impacts on animal husbandry livelihoods as a result of severance / reduced access to grazing lands and water sources during the Construction Phase.	<ul style="list-style-type: none"> • Direct consultation with individual animal husbandry enterprises to the north and south of Kiyikoy • Direct consultation with animal husbandry enterprises in Bahcekoy and Gungormez • Review of incoming grievances
	Monitoring potential adverse impacts on lumbering workers, such as reduced access to forest areas as a result of Construction Phase activities	<ul style="list-style-type: none"> • Kiyikoy Agricultural Development (Forestry) Cooperative • Kiyikoy Forestry Directorate
	Monitoring with beekeepers who have been relocated due to Project activities, to confirm that there is no reduction in honey production as a result of relocation.	<ul style="list-style-type: none"> • Direct consultation with Kiyikoy beekeepers • Review of incoming grievances

Monitoring Activity	Description	Method
	Monitoring of impacts on Selves Beach users (note that this is partially a diverse, changing and temporary group of stakeholders, e.g. a mix of residents, local visitors, tourists from outside the region, etc.).	<ul style="list-style-type: none"> • Consultation with Kiyikoy and Vize Tourism Association • Consultation with tourism businesses in Kiyikoy • Beach use monitoring • Review of incoming grievances
Local Economy Monitoring	Monitoring of general economic conditions in case the Project gives rise to any unanticipated economic changes within the Local Communities, as well as to assess the effectiveness of the Project's local content practices.	<ul style="list-style-type: none"> • Ongoing consultation with local authorities and community representatives • Regular community liaison • Review of Project local content practices
	Monitoring potential adverse economic impacts on tourism sector <i>[Note that the potential for impacts to arise will be based on the results of air quality, noise, landscape and visual amenity, and seabed sediment and marine water quality monitoring, which are to be shared with these stakeholders.]</i>	<ul style="list-style-type: none"> • Ongoing consultation with local authorities and community representatives • Consultation with Kiyikoy and Vize Tourism Association • Consultation with tourism businesses in Kiyikoy • Beach use monitoring • Review of incoming grievances
	Monitoring the potential for Project impacts on the fishing community. This will primarily comprise perception and trend monitoring with these stakeholders. <i>[Note that the potential for impacts to arise will be based on the results of seabed sediment and marine water quality monitoring, which are to be shared with these stakeholders.]</i>	<ul style="list-style-type: none"> • Consultation with Kiyikoy Fishing Cooperative • Consultation with inshore and offshore fishermen • Review of incoming grievances
Local Community Monitoring	Monitoring the conduct of workforce in the community.	<ul style="list-style-type: none"> • Ongoing community liaison and engagement with local authorities, Kiyikoy Gendarmerie, health officials and community representatives • Internal records of anti-social incidents / violations of code of conduct • Review of incoming grievances received related to workforce conduct

Monitoring Activity	Description	Method
	<p>Monitoring of impact on local facilities and services, e.g. health and accommodation.</p> <p>As a number of non-local workers are employed on the Project, the Company will monitor whether there any noticeable increase in demand for local services and facilities (e.g. health facilities, accommodation) by non-local workers on the Project, to establish whether there are any negative impacts on the provision of these services to Local Communities.</p>	<ul style="list-style-type: none"> • Direct consultation with health and accommodation service providers • Review of workforce internal records and assessments, including workforce numbers of and reported medical incidents, etc.
	<p>Monitoring of impact of construction traffic on Local Communities</p> <p>Monitoring of construction traffic will also be undertaken, including monitoring of traffic-related grievances. In addition, the Project will monitor community perceptions about construction-traffic through ongoing consultations, e.g. community visits, meetings, etc. This will include verifying the effectiveness of traffic safety measures. Engagement will particularly focus on the communities of Bahcekoy and Gungormez and issues of road safety and community severance.</p>	<ul style="list-style-type: none"> • Ongoing community and local authority liaison (Kiyikoy, Bahcekoy, Gungormez and Saray), in particular with potentially affected receptors • Perception survey • Grievances received relating to traffic • Traffic monitoring • Internal records of traffic violations
	<p>Monitoring of general construction impacts on local communities, including any instances of reduced residential amenity as a result of visual impacts of onshore and nearshore construction</p>	<ul style="list-style-type: none"> • Ongoing community and local authority liaison • Perception Survey • Review of incoming grievances

The frequency of targeted engagement activities for monitoring will be determined on a case-by-case basis depending on the specific monitoring requirements, although as alluded to in Table 5-3, much of the social component of the monitoring activities will be carried out through the Project's existing commitments to ongoing consultation with Local Communities and community representatives.

Furthermore, the Project will undertake a perception survey on a periodic basis in order to baseline and monitor attitudes towards various aspects of the Project's health, safety, social and environmental performance.

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

Project environmental monitoring will also be conducted in accordance with Turkish environmental monitoring requirements.

5.5 Community Investment Programme

5.5.1 CIP Framework and Priority Areas

As discussed in Section 4.5.1 a number of community investments have already been implemented in 2017. In addition to the measures to avoid and mitigate adverse Project impacts as outlined in the EIA documentation, in line with good international industry practice, the Company has developed a Community Investment Programme (CIP). A CIP is a platform for promoting local development opportunities and building relationships with community stakeholders, and ensuring that community concerns are appropriately addressed, in a manner that supports business objectives.

A CIP strategy and framework has been established which sets out the aims, objectives and principles of the CIP. The framework has identified the following proposed priority areas that the Company's community investment initiatives will support:

- **Environmental Stewardship:** Investments in research and educational awareness to preserve biodiversity and nature on land and at sea within the vicinity of the Project and the Black Sea in general. This also includes local initiatives aimed at environment clean-up, reusing natural resources and minimising waste.
- **Economic and Skills Development:** Investments that aim to support or enhance the functioning or develop the capacity of important economic sectors in Kiyikoy – tourism, fishing, forestry, and animal husbandry. This also includes investments in skills development through education and training, of groups such as youth and women in particular.
- **Community Safety, Health and Wellbeing:** Initiatives that support safer and healthier communities, including contributions in education, health, recreational and youth facilities, and other social infrastructure. This also includes support for events and activities within the community.
- **Cultural Heritage Stewardship:** Projects that support the protection and preservation of sites and objects with cultural heritage value within Local Communities and the Black Sea in general, as well as research and educational activities in support of this cause.

Community investments will cover a mixture of investments in projects and programs aligned to one or more of the priority areas outlined above, as well as sponsorships and donations in these areas. The CIP framework has also established a set of criteria to evaluate proposed investments and initiatives.

In addition, in Q3 – Q4 2017 the objectives, principles and criteria of the CIP were communicated on via a brochure and discussed with relevant stakeholders to manage expectations among them.

5.5.2 Community Investment in 2018

As discussed in Section 4.5.2, Community Needs Assessment was undertaken in Q4 2017 which was intended to inform the development of the Community Investment Programme for the remainder of the Construction Phase.

Starting in January 2018, meetings will be 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.

As part of this process, the Community Investment brochure will be distributed more widely in Local Communities and stakeholders will be informed about:

- the process of identifying and selecting projects;
- the areas in which the Project will invest in; and
- the ways in which they can submit proposals or requests which will be considered as part of the Community Investment Programme.

It is anticipated the first set of CIP projects selected as part of the aforementioned process will be implemented from the end of Q1 2018 in partnership with identified organisations. During the life of the CIP, engagement with relevant stakeholders will continue to ensure they are informed of the CIP and its results, as well as engagement aimed at identifying partners to implement projects and developing projects in coordination with relevant authorities, community stakeholders and partner organisation.

The CIP in 2018 will also consider incoming proposals for community investments received from stakeholders to date. Those taken forward for implementation will have been assessed according to the criteria outlined in Section 5.5.1 above and that are subsequently approved by the Project.

5.6 Ongoing Community Liaison

The Company is committed to ongoing dialogue with Local Communities about various aspects of the Project. The CLO will continue to engage with Local Community residents and representatives to provide information, respond to questions, and receive feedback on issues, concerns and grievances. Ongoing engagement with Local Communities during the Construction Phase will primarily be achieved via regular liaison meetings with community representatives, notification meetings, as well as targeted engagement events with schools and other community organisations.

The CLO will continue to visit Local Communities to consult with representatives and residents on an informal basis. 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.

More structured consultations with Local Communities will be organised as outlined in the preceding sections of this document to provide updates, share Project information, or describe actions being taken to manage any issues or impacts that affect Local Communities.

5.6.1 Ongoing Local Authority Liaison

The CLO will continue to engage with Local Authorities on an ongoing basis to keep them informed about Project activities and seek input into Project management and mitigation measures. This

will take the form of regular monthly Project Update meetings. Meetings on specific issues that arise will be scheduled on an as needed basis.

5.6.2 Kiyikoy Information Centre

The Project is planning to open an Information Centre in Kiyikoy, where people can visit to find out more information about the Project, ask questions and provide comments or lodge grievances.

At the time of writing, central locations in Kiyikoy town are being investigated as potential venues for the Information Centre. It is planned that the Information Centre will be opened prior to the start of onshore construction activities.

5.6.3 'Awareness Raising' Events

The Project will continue to identify opportunities to share information about the Project through 'Awareness Raising' Information Events. This will include presentations to schools in Local Communities to increase awareness of the Project and educate students about issues such as traffic safety, environmental protection, construction techniques, etc. Furthermore, such 'Awareness Raising' events may be replicated to target other community groups.

5.7 Project Materials Disclosure

Project information and updates will also be regularly communicated via the Project website (www.turkstream.info), including reporting on the Project's environmental and social management and performance.

Brochures and other materials and reports will be published on the website, made available in Local Communities and distributed during meetings. Specific information materials covering announcements, notifications, or updates may also be prepared as appropriate to aid the engagement activities presented above.

A Project Environmental and Social Report explaining technical details of the Project, expected impacts, and mitigation measures to address these impacts will be prepared in a non-technical format and distributed in Local Communities in Q1-Q2 2018.

An overview of the anticipated engagement materials and methods that will be disclosed up to the end of the construction phase of the Project is outlined in Table 5-4 below.

Table 5-4 Types of Information Disclosure during the Construction and Pre-Commissioning Phase

Type	Method
Announcement of Project Milestones (e.g. completion of pipeline construction, first gas, full operations)	Website; Newspapers; In-person during meetings, community visits, etc.
Ongoing distribution of Feedback Process and Grievance Procedure leaflet, Community	Website; Kiyikoy Information Centre; In-person during meetings, community visits, etc.

Type	Method
Investment Programme leaflet and Kiyikoy brochure	
Other leaflets / brochures that may be developed covering environmental, social and cultural heritage topics	Website; Kiyikoy Information Centre; In-person during meetings, community visits, etc.
Stakeholder Engagement Plan updates	Website; Kiyikoy Information Centre
Environmental and Social Reports (e.g. Project Environmental and Social Overview Report)	Website; Kiyikoy Information Centre
Project Updates	Website; in-person during meetings, community visits, etc.
Notice of Upcoming Activities	Website; Newspapers; in-person during meetings, community visits, etc.

6 Roles and Responsibilities

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

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 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.

A Community Liaison Officer (CLO) is working with the Stakeholder Engagement Expert to ensure direct liaison with Local Communities and other Project stakeholders. The CLO will be available to local communities and other interested or potentially affected stakeholders. The CLO will also usually be the first point of contact in relation to community questions, complaints or grievances and will also assist in the identification and resolution of issues or grievances that could arise from the Project. A Corporate Social Responsibility Expert based at the construction site is planned to be appointed in early 2018, who will be responsible for managing construction contractors in terms of their compliance with Project standards and requirements relating to social issues.

StratejiCo, a community engagement consultant, supports the Project's Stakeholder Engagement activities in Turkey. StratejiCo provides advisory and strategic guidance on community engagement and social management activities, as well as direct support in implementing these activities. An Environmental and Social Monitoring contractor will also be appointed to lead the Project's socio-economic monitoring programme (refer to Section 8.1), including evaluating the Project's performance in managing social issues.

Prior to the start of construction, South Stream Transport will further discuss stakeholder engagement and management goals with the Construction Contractor. Plans and practices will be developed to ensure that the existing stakeholder engagement programme is maintained or improved throughout construction, with clear definition of procedures and responsibilities. There will be one Grievance Procedure for the Local Communities with co-ordination between the Project CLO and the Contractor managing and resolving community concerns.

The stakeholder engagement programme is under the responsibility of the Project's Technical 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, are communicated internally through formal procedures and management practices (e.g. meeting plans and pre-meeting briefings, standard Question-and-Answer resources), trainings (e.g. media training, stakeholder engagement training for field staff), and documentation (e.g. minutes of meetings, Stakeholder Engagement database).

7 Contact with South Stream Transport

7.1 Feedback Process

Stakeholders are invited to provide feedback about the Project. This lets us know how we are doing, and helps us identify areas that might be improved. Feedback may include questions, comments, requests for information, suggestions, concerns, and 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 Büyükdere Cad. No. 26 (Windowist Tower)
34467 Maslak, Sarıyer, Istanbul, Turkey
Phone : +90 212 9008320

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

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

- **Turkish Community Liaison Officer, Emre Kapusuz**

Phone: +90 212 900 8325 / +90 549 460 9928
Email: emre.kapusuz@turkstream.info.

Or comments may be submitted by:

email to: feedback@turkstream.info
via website: [http://turkstream.info/about/feedback/Grievance Procedure](http://turkstream.info/about/feedback/Grievance%20Procedure)

7.1.1 Overview

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

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

Specific objectives of the Grievance Procedure are:

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

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

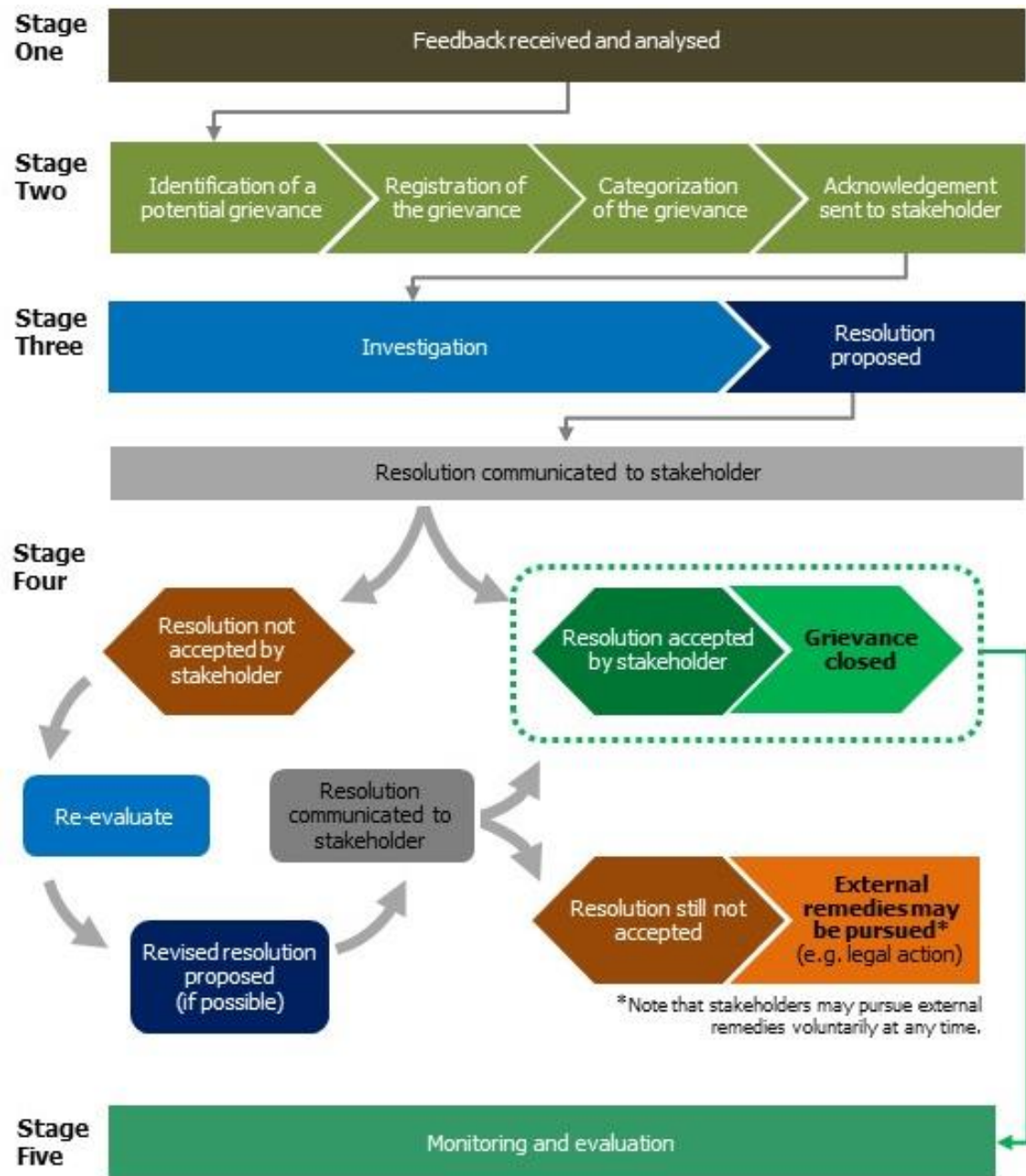
7.1.2 Grievance Procedure Process

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

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

Figure 7-1 Grievance Procedure Flowchart



7.1.3 Compensation Management and Livelihood Restoration Framework

In certain circumstances, where it has not been possible to adequately mitigate for a significant adverse impact by avoiding or minimising the impact, it may be appropriate to provide compensation. In other cases, new or different impacts may arise as the Project progresses, as a result of changing baseline characteristics, third-party actions beyond the control of the Project,

and/or changes to the assumptions contained within this assessment. While the Project will monitor environmental and socio-economic conditions and adjust or implement mitigation measures as needed, there may be circumstances requiring compensation, or outright claims for compensation, as a result of impacts that have occurred.

Compensation may also comprise livelihood restoration measures, to provide for the possibility that livelihood impacts do occur. The Project will develop a Compensation Management and Livelihood Restoration Framework to guide the evaluation and determination of compensation and livelihood restoration measures.

The Compensation Management component of the Framework will capture the process and requirements for assessing compensation claims and implementing compensation measures. Compensation measures may include financial compensation or in-kind contributions.

Compensation for economic loss would include circumstances where compensation would be able to mitigate the financial impacts associated with reduced revenues or increased costs to a business or individual that can be reasonably attributed to the construction of the Project. The Framework will ensure that possibly affected people or businesses are appropriately compensated for lost assets or access to assets. The framework will set out certain criteria to ensure that compensation is paid consistently and equitably.

The Livelihood Restoration component of the Framework will also define the process that will be undertaken to identify the need for specific livelihood restoration measures, and the development of these measures in consultation with affected stakeholders and relevant local agencies. The overall goal will be to ensure that affected livelihoods are restored, at minimum, to pre-impact levels.

The Compensation Management and Livelihood Restoration Framework will be closely tied to the Grievance Procedure. Additionally, a specific component of the Construction Management Plans will also address the issue of compensation, with reference to the Compensation Management and Livelihood Restoration Framework and other plans and frameworks as appropriate. As part of the process of implementing the Framework, the Project will work with the affected stakeholders in order to identify appropriate compensation or restoration measures.

8 Monitoring and Reporting

8.1 Monitoring

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

Monitoring will include:

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

8.2 Tracking Stakeholder Engagement Activities

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

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

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

8.3 Project Reporting

8.3.1.1 Internal Reporting

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

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

8.3.1.2 External Reporting

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

During the Construction & Pre-Commissioning Phase, the Project will report regularly via its website and in local communities in Turkey and Russia on Project progress, implementation of mitigation measures, compliance with ESMS and overall performance. An Annual Environmental and Social Report will be prepared by the Project which will include a summary of issues raised by stakeholders, numbers and subjects of grievances, a summary of key actions taken to address concerns, and an analysis of trends in KPIs.

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

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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