



ACACIA MINE OPERATIONS GÖKIRMAK COPPER MINE

Community Health, Safety and Security Management Plan 2017

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AECOM

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1. PURPOSE AND SCOPE

1.1 Purpose

The main purpose of the Community Health, Safety and Security Management Plan (“the Plan”, “MP”) is to provide a well laid out set of actions and clear responsibilities for management of the Project’s identified impacts and risks that may affect the health and safety of the communities. The MP is structured to facilitate the following purposes:

- Continuous identification and evaluation of the impacts and risks of the Project activities on the local communities, set out by the Environmental and Social Impact Assessment (ESIA) Report
- Prevention and minimization of the said impacts to community health safety and security by identification of strategies and procedures
- Enhancement of positive impacts to community health, safety and security
- Ensuring the security personnel’s compliance with Project standards
- Clear identification of roles and responsibilities
- Description of relevant Project standards and list of other MPs or applicable documents this MP is related to
- Definition of required monitoring and reporting procedures
- Definition of required review and update procedures
- Definition of training requirements

1.2 Scope

The requirements set out by this plan applies to all activities that may result in impacts to communities and the MP is prepared to cover construction, operation and closure phases of the Project.

All contractors/subcontractors are also required to comply with the management strategies and procedures set out by this Plan.

The Plan includes measures for management of the following potential impact subjects, identified by the Project ESIA, on community health, safety and security:

- Impacts on general community health (exposure to disease, air quality and water quality)
- Availability of water resources
- Traffic management and related impacts
- Emergency response and unplanned/uncontrolled incidents
- Community access to infrastructure
- Relations of the Project personnel and communities including potential conflicts, and Project security personnel requirements

The Community Health, Safety and Security Management Plan is a living document and may be updated to facilitate any potential changes to the planned Project activities or any additional insight gained through implementation and practice.

2. ROLES AND RESPONSIBILITIES

Acacia Mining Inc. (AMI) has the sole responsibility of; ensuring measures set by the ESIA Report are being implemented, developing appropriate and adequate measures where any additional/unexpected impact is identified and having the contractors/subcontractors adhere to this MP.

Roles and responsibilities for implementation of this MP are listed in Table 1.

Table 1. Roles and Responsibilities

Roles	Responsibilities
Operations Manager	<ul style="list-style-type: none"> • Approve the Plan and assign adequate resources (personnel and financing) required for the Plan's implementation.
GCP Public Relations Manager	<ul style="list-style-type: none"> • Ensure compliance with the Project Standards and other requirements identified by this Plan. • Overall responsibility for implementation of the Plan. • Inform the communities of this Plan and its implementation through adequate and appropriate stakeholder engagement practices. • Ensure coordination with other related stakeholders such as local government authorities. • Ensure all related incidents/non-compliances are recorded, investigated and reported. • Respond when any community grievance regarding community health, safety and security is received, inform related departments of the grievance. • Undertake all internal social reporting for the Project and ensure that KPIs are monitored. • Review and assess monthly contractor monitoring for social issues including local labor force and labor influx. • Develop, monitor and revise the Plan as required (in cooperation with the HSE Manager).
HSE Department (HSE Manager, HS Superintendent and Environmental Superintendent)	<ul style="list-style-type: none"> • Ensure environmental and social measures relevant to community health, safety and security are implemented. • Monitor effectiveness of the said measures through monitoring and develop additional measures as required. • Ensure all related personnel are fully trained in air quality management, traffic management, water resources management, handling of security, emergency management. • Conduct routine inspections and ensure Project activities are conducted in compliance with this MP.

Roles	Responsibilities
	<ul style="list-style-type: none"> • Ensure all related incidents/non-compliances are investigated and reported to the Public Relations Manager. • Develop, monitor and revise the Plan as required (in cooperation with the Public Relations Manager).
Contractor/Subcontractor Management	<ul style="list-style-type: none"> • Report any incident/noncompliance to the AMI OHS Department. • Develop and implement measures in coordination with the AMI OHS Department. • Ensure own personnel to adhere to this Plan.
All AMI and Contractor/Subcontractor Personnel	<ul style="list-style-type: none"> • Report any non-compliance/incident to Managers or superintendents.

3. PROJECT STANDARDS

Project standards and requirements are described in detail in the Project ESIA Volume-I and Volume-II and are listed below:

- National legislative requirements and all permits, licenses and approvals
- EBRD Environmental and Social Policy and Performance Requirements (PRs)
- European Union legislative requirements and Best Available Techniques (BAT) applicable to the Project
- UN Guiding Principles Business and Human Rights
- Other good international industry practices (GIIP)
- International Conventions and Protocols Turkey is a party to
- AMI Environment, Health and Safety and Social Policies

Applicable standards shall be complied with for all Project activities.

3.1 Related Management Plans

Implementation success of all environmental and social management plans will either directly or indirectly affect community health, safety and security. Important overlaps with other management documents are listed below:

- Environmental and Social Management System
- Traffic Management Plan
- Emergency Action Plan
- Emergency Preparedness Plan for Kepezkaya Tailings Storage Facility
- Stakeholder Engagement Plan
- Local Employment and Training Management Plan
- Local Procurement Management Plan

4. MITIGATION MEASURES

Community health, safety and security assessments and measures provided here are based on the Social Impact Assessment (SIA) Report, which is presented as Volume-II of the Project ESIA Report, GIIP, expert knowledge of the sector and a review of the impacts caused by or expected to occur due to activities of similar projects.

It should be noted that since the Project's environmental impacts are, to some extent, related to community health and safety, implementation of the Environmental Management Plan (EMP) will largely provide for success of community health, safety and security. The measures listed below are more directly related to community health, safety and security. See the EMP and the SIA for subjects and measures not listed here (e.g. impacts on water quality, visual impacts, etc).

4.1 Air Quality

The construction works to be carried out and the construction of the haul and access roads will lead to dust generation during the construction phase. On the other hand, during the operation phase, the use of the haul road between the Open Pit and the Process Plant, and the extraction, storage and haulage of waste rock are the activities that will cause dust emissions that may potentially have impacts on local communities. Measures proposed the ESIA are listed below:

- Use of water sprinkling on ore transport, waste rock transport and access roads.
- Application of speed limits on ore transport, waste rock transport and access roads during operation phase and access roads during construction phase.
- Utilization of the minimum height of fall possible, during loading/unloading, transfer, and discharge of materials.
- Covering vehicle loads with sheeting prior to offsite transport.
- Restriction of off-road travel.
- Use and maintenance of effective filters in vehicle cabs to keep air free of dusts and fumes.
- Use of filter systems in crushing-screening machinery and closed crushing-screening facilities (already in place as a design measure for operation phase).
- Re-vegetation or otherwise rendering non-dust forming of surfaces in inactive/decommissioned Project areas
- Vehicles will not be permitted to keep engines running while waiting to enter the sites or waiting on-sites.
- Machinery will not be left running in periods between work, or will be throttled down to a minimum.
- Dedicated parking areas will be established for employees' vehicles.
- Periodic maintenance of both heavy and light vehicle fleets and other emission source equipment will be conducted.
- A grievance mechanism established in order to review complaints on the issue and to monitor the problems arising.
- A Stakeholder Engagement Plan developed, in order to specify communication and notification mechanisms on the measures taken and activities carried out.
- It is recommended that the farmlands and the patterns of products cultivated on these farmlands in the vicinity of areas with high dust emissions during the construction phase are identified, and leased temporarily until measures regarding dust emissions are taken effectively.

4.2 Hazardous Materials Management

The main hazardous material use in the scope of the Project is explosives. During the construction phase, explosives are not stored, but used on a daily basis. The same method will be utilized during the operation phase too.

Since the amount of explosive use will increase during the operation phase, vehicles loaded with explosives will also increase. This, in turn, necessitates special measures to be designed for traffic safety that are in line with related legislation regarding transportation of hazardous materials on state roads.

In addition, other hazardous materials will also be used during construction and operation activities. Therefore, the measures regarding storage and transport of explosives will also be valid for chemical substances.

Measures associated to hazardous materials management proposed by the SIA are listed below:

- Drawing up procedures regarding the hauling and storing of hazardous substances (procedures already in place)
- Holding toolbox meetings with relevant personnel is recommended.

4.3 Blasting Activities

For blasting activities an Explosives Risk Analysis Report has been prepared by Okan University in 2014. According to the Report, a controlled blasting method will be applied by using delayed (millisecond) detonators and appropriate blast designs. The Report states that the nearest settlement component to the open-pit is a hayloft located in Sepetcioglu Neighbourhood. The calculated peak particle velocity at this location is lower than the limit value in the related Regulation. Peak particle velocities will be monitored during test blasting period.

Measures proposed by the SIA for both construction and operation phases are listed below.

- A blasting procedure is already in place.
- Vibrations caused by blastings will be constantly measured and recorded, and the commitments made in the EIA Report will be fulfilled.
- Households, especially the village headman and the municipality will be informed prior to blasting activities.
- Blasting activities will be avoided at nights.

4.4 Water Resources Quantity

Mining operations include risks such as partial loss of water resources (natural springs, fountains and etc.), reduction in water quantity, and hampering access to drinking water. This Plan will be updated and additional measures will be provided once the related hydrogeology surveys are completed. Measures identified by the SIA are as follows:

- In case it is determined in monitoring and evaluation studies that there is a reduction in the water resources of affected settlements, support should be provided to ensure that households find and utilize new water resources

4.5 Noise and Vibration

No noise impact on local communities in excess of EU, IFC, EPA or national legislation limits was identified by the ESIA. Therefore, monitoring is sufficient and additional measures will only be developed in case of a valid grievance or in case the monitoring results are above limits.

4.6 Traffic and Road Safety

Traffic activity on roads is expected to increase during both construction and operation phases. This will in turn require increasing road safety and security measures. In addition to the local communities that may potentially be affected by dust generation and increased traffic load, some communities may also be affected by the traffic load increase on the highway connecting Samsun port and Hanönü district, since this road will be used for transport of concentrated metal. Measures proposed by the ESIA include the following:

- Implementation of the Traffic Management Plan.

- Providing traffic trainings for all personnel and providing specialized trainings to personnel that will operate industrial vehicles and workers.
- Restricting operation of industrial vehicles to those that are trained and competent (licensed if required).
- Conducting periodic medical checks of drivers.
- Installation and maintenance of signage and other traffic regulating means.
- Setting speed limits, right of way practices, periodic vehicle maintenance and other traffic management practices where required.
- Implementation of the Procedure on Road Safety and Driving.
- Train the employees of the Company and the subcontractors on traffic, defensive driving techniques etc..
- Escape ramps will be built on the haul road between the open pit mine and the mining facility, which will reduce accident risks.
- Measures to prevent the entrance of pedestrians and animals will be taken.

4.7 Natural Hazards

Communities may potentially be affected by natural hazards that may affect the Project units or natural hazards may potentially be induced by Project activities. These include the following:

- Blasting operations may potentially induce seismicity and landslides.
- Slope stability problems may cause failure of WRDs.
- A potential flooding or failure of the TSFs may cause serious health impacts.

It should be noted that mitigation/prevention measures for natural hazards are generally design controlled measures and are described in detail in the Project ESIA Report.

The SIA Report proposes the following additional mitigation measures for potential risks related to natural hazards:

- Open Pit and WRDs will be checked against flood and landslide risks with geo-radar, and measurements will be performed.
- In order to prevent blasting activities from inducing landslides, a landslide survey will be prepared.
- In order to identify the current conditions of houses around the mine, construction survey reports for designated houses will be prepared.

4.8 Disease

The Project may elevate levels of communicable and vector borne diseases and the work load of healthcare personnel in the district will possibly increase as a result of population growth due to the Project. Moreover, the population growth will increase the applications to the hospital in Taşköprü district, which may in turn intensify the work load of the hospital. Of the measures proposed, the following are related to community health and safety:

- Providing trainings to the employees on healthcare within the scope of safety, health and environment works in order to reduce the intensity of current healthcare services.
- Employing a workplace doctor and allied health personnel.
- Establishing an infirmary to be used during construction and operation phases.
- In case a healthcare facility is opened in the district, providing in-kind and financial support to the opening of this facility.

4.9 Emergency Preparedness and Response

The Project has the following management plans in place for emergency preparedness and response:

- Emergency Action Plan
- Emergency Preparedness Plan for the Kepezkaya Tailings Storage Facility

4.10 Conflict Potential and Introduction of New Security

Any social event or protest which may create social tensions within the context of the ongoing works has not occurred in the meantime. The field studies conducted did not indicate any social conflict, protest or tension related with the operations of Acacia Mining or between communities either. Details on potential conflict sources are provided in Volume-II of the Project ESIA Report and the measures proposed by the Report are as follows:

- Employing a Public Relations Unit as soon as possible.
- Taking the measures specified as regards public health and safety, and infrastructure and quality of life.
- Internal and external grievance mechanisms in place.
- Stakeholder Management Plan in place.
- Establishing a Community Advisory Panel (CAP).
- Providing trainings on cultural differences, gender sensitivity, and prevention of miscommunication to new recruits within the scope of orientation trainings.
- Providing training to personnel who work outside the plant and the mine at locations close to settlements on their own on issues regarding cultural behaviors to be respected.
- Providing training to especially those who work at Bağdere Çayağzı locality and the workers at the workers' camp near the open pit mine on gender sensitivity and related topics.
- Providing training to security personnel on topics such as rules of conduct etc.
- Conducting human rights impact assessment studies regularly.
- Preparing annual work force mobilization plan by including also the divisions related with work force and subcontractors, leaving the local employees to last during dismissals.
- Carrying out community-based, corporate social responsibility projects for common interest.
- Creating scholarship programs, which have particularly positive impacts before communities, for university students whose place of registry is Hanönü and who reside here.
- Building a video surveillance system within the project area, improving the existing systems, and providing support to the efforts to build a surveillance system in the district.

5. MONITORING AND REPORTING

In order to verify the performance of management measures, various monitoring systems, as part of the Project ESMS, are required. Monitoring for environmental aspects and impacts that are also relevant to community health and safety (i.e. air emissions, water resources management, etc.) are presented in the Monitoring Plan provided in the Volume-I of the Project ESIA, whereas monitoring for social aspects and impacts (i.e. effective stakeholder management, livelihood, etc.) are presented in Volume-II of the Project ESIA. Key monitoring activities directly related to community health, safety and security are listed in Table 2.

Table 2. Key Monitoring Activities

Subject/ Aspect	Monitoring Method	Monitoring Frequency	Monitoring Location
Community Health, Safety and Security	-Number received and closed grievances -Number of security personnel related incidents	Annual	Affected neighborhoods and Project Office
Diseases	-District health statistics	Annual	Affected neighborhoods

Subject/ Aspect	Monitoring Method	Monitoring Frequency	Monitoring Location
	-Number of health promotion activities conducted with participation of local communities		and Project Office
Traffic Management	-Number of traffic accidents/incidents -Number of companies and drivers trained -Traffic warning signs' condition -Number of vehicles and drivers checked for speed limit and traffic rules -Number of issued traffic fines	Annual	Affected neighborhoods and Project Office
Sustainability of Access to Education and Healthcare Services	Education: -Number of students supported -Number of trainings given for health and safety, traffic and precautions near mine area Healthcare: -Healthcare personnel employed -Number of training sessions held with local healthcare providers	Annual	Affected neighborhoods and Project Office

In case monitoring results in identification of non-compliance, the non-compliance will be investigated either by the HSE Department or by the Public Relations Manager, depending on the nature of the non-compliance. Following this, a roadmap or proposal for ensuring compliance will be developed, added as a revision to this MP and implemented.

6. TRAINING

AMI will provide to its own personnel with a broad range of trainings, including general induction, site specific induction, occupational health and safety and environmental awareness/protection trainings. The Company will require the contractor/subcontractors to provide the same level of trainings to their personnel and will monitor the effectiveness of these trainings through monitoring of records. In general, a broad range of these environmental and occupational health and safety trainings also cover community health, safety and security issues (e.g. driving trainings, disease prevention trainings, etc.). In addition to these, the trainings will cover the following specific subjects:

- Communicable diseases, disease prevention and general cleanliness.
- Security personnel trainings, including topics such as avoidance of conflicts, use of force and human rights.
- Safe driving and road safety trainings, including general trainings for all personnel and specialized trainings for drivers of specific vehicles (explosive supplier firms' personnel will be required to have necessary licenses and equal road safety trainings.)

- Specialized trainings for personnel involved in activities that are conducted off-site, including topics such as avoidance of conflicts, gender sensitivity and cultural sensitivity.
- Emergency response trainings and external communications trainings.
- Trainings that will be provided to local communities, including topics such as road safety awareness, environmental awareness and healthcare awareness (These trainings will have a focus on vulnerable groups such as the children and the elderly and some will be conducted with attendance of experts such as local healthcare providers).

7. REVIEW AND UPDATE

This Plan will be reviewed periodically and as required. In case any noncompliance with existing project standards is identified or any corrective measure is required, the plan will be updated accordingly. The Public Relations Manager and the HSE Manager are responsible of review and update of the MP and the General Manager will be responsible of approval of any revisions to the Plan. The plan will be recommunicated to all AMI personnel, will be shared with contractor/subcontractor management and local communities through stakeholder engagement.