



ACACIA MINE OPERATION GOKIRMAK COPPER MINE Livelihood Restoration Plan 2017

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**Social
Risk
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Abbreviations

AMI	Acacia Mining Operations
CIP	Community Investment Program
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
GCM	Gökırmak Copper Mine
GCP	Gökırmak Copper Project
GIS	Global Information Systems
HAC	Hanönü Advisory Council
LRP	Livelihood Restoration Plan
PAH	Project Affected Household
PAP	Project Affected Population
PAS	Project Affected Settlements
PR	Performance Requirements
RAP	Resettlement Action Plan
SIA	Social Impact Assessment
TEİAŞ	Turkish Electricity Transmission Company
TSF	Tailings Storage Facility

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Executive Summary

Acacia Maden İşletmeleri A.Ş. (“AMI” or “Acacia” or the “Company”) is planning to apply for a loan to International Financing Institutions (IFIs) for the development of the Gökırmak Copper Project (“GCP” or “the Project”) located in Hanönü district of Kastamonu province of Turkey. The Livelihood Restoration Plan (LRP) for Gökırmak Copper Project (GCP) is a comprehensive plan that addresses economic displacement of Project Affected Persons (PAPs) due to land acquisition triggered by the Project.

The LRP defines the procedures to follow regarding land acquisition and/or land use, provides legal background, depicts land acquisition required by the Project, sets socio-economic baseline for PAPs, establishes entitlements and compensations for economic displacements, devises mitigation mechanisms to reduce/minimize potential adverse impact, discusses stakeholder engagement and grievance mechanisms, identifies programs to restore PAPs livelihoods with a LRP budget and sets forth monitoring and evaluation mechanism.

LRP is drafted in accordance with the liabilities of Turkish laws and legislation, social and environmental policies of Acacia Mining Company (“AMI” or “Acacia” or the “Company”), European Bank for Reconstruction and Development (EBRD) Performance Requirements, International Finance Corporation (IFC) Performance Standards and Equator Principles.

The scope of LRP covers all project related facilities including associated facilities, river diversion and Energy transmission line (ELT). A detailed ELT LRP is included as an Annex to this document.

Land acquisition for the first phase of the Project is completed. The Project’s land acquisition comprises of public and private land and the Project in its current design does not entail physical resettlement. Depending on Project needs, in future phases Project may acquire additional land and assets such as some of the summer houses at Sepetçiler that may be affected from the mine operations. Any additional land acquisition will be conducted according to Acacia Land acquisition policy which follows EBRD Performance Requirement 5 (PR5). Should the Project require additional land acquisition that triggers physical resettlement, the Project will prepare a Resettlement Action Plan (RAP) according to European Bank for Reconstruction and Development (EBRD) Performance Requirement 5 (PR5).

Acacia is committed to minimizing land acquisition in order to reduce potential economic displacement and physical resettlement. Some of the measures included in minimizing Project’s land acquisition are; improving the capacity of the Corakoglu Waste Rock Dump in order to reduce land acquisition from other sources for waste rock¹; utilizing Project facilities for ore storage as opposed to acquiring additional land for ore storage which was included in Turkish EIA report, minimizing footprint on Yılanlı Forestry area upon PAPs requests by 4.8 ha; and building an additional access road which does not only avoid village traffic but also acts as a fire access road to be used in forest fires.

¹ The Gelberi WRD has a footprint of approximately 85 ha and the haulage distance from the pit to this area is approximately 3 km. Utilization of Gelberi WRD is not expected since Çorakoğlu WRD’s capacity is sufficient. Source: EIA Volume 1

Project's total land acquisition covers 4,122 decares in 610 parcels. 79% of the project affected land is forestry land, followed by Private land (13 Percent), and Treasury lands (6 Percent). The impact on forestry land is limited (1 percent of total forest available for the communities). Private lands constitute a small portion in the total Project area. LRP focuses on impacts of loss of land (private/public) on PAPs. There are four directly affected settlements, two of which are neighbourhoods and two are villages. These settlements have a total of 11 mahalles and villages. These settlements are directly impacted by Project activities such as land acquisition, employment and local procurement.

Acacia Mining Operations initiated the land acquisition process following project investment decision in August 2013. Meetings were held with public institutions, mukhtars and stakeholders that could be affected by land acquisition. Almost **300 decares of private land in 91 parcels were acquired through willing buyer seller agreements. All private parcels for Project's main facilities were acquired through willing buyer seller agreements, except for Energy Transmission Line (ETL).** 224 decares of land(357 parcels)affected from the ETL were expropriated and compensation were paid to the parcel owners. Energy Transmission Line constructed for the Project is 28,102 meters (28 km) with a power of 31.3 kV, (2X3X477) from Taşköprü transformer center to Hanönü. Land acquisition for public lands were carried out within the framework of the local legislation, payments were made to responsible authorities in line with the requirements of Turkish Expropriation law.

XXXX

Land acquisition for private parcels impacts 117 PAPs, yet due to out migration over the years majority of PAPs (77%) are either non-residents or temporary residents. There were 20 permanent resident Project affected households (PAH), and 7 seasonal PAHs who have lost private land due to the Project. Acacia Mining Operations has two neighbourhoods (3 settlements) affected by GCP's **private** land acquisition activities. **Yılanlı settlement** in Hanonu Central (Merkez) Neighbourhood is affected from the land acquisition for the Project's the Tailings Storage Facility (TSF). Vakıfgeymene Neighbourhood on the other hand is impacted from land acquisition for the open pit site (**Sepetçioğlu and Dereköy**). Household surveys were conducted in these settlement with owners/users of the private parcels. Following is a summary table for land acquisition according to landtype and ownership.

Land Type	Ownership (decares)	Easement (decares)	Total land (decares)	Number of parcels
3rd party	—	33.99	33.99	22
Municipality	—	20.31	20.31	12
Treasury	—	232.9	232.9	35
Forestry	—	3251.8	3251.8	10
Private Acquisition	286.2	—	299.84	91
Private expropriation*	—	224.45	224.45	357
Private leased	—	13.27	13.27	10
Unregistered (riverbed etc)	—	45.77	45.77	73
Total	286.2	3822.49	4122.33	610

*Expropriation is only triggered for ETL by the TEDAS

Source: Acacia Mining Operations, 2017

Gökçeagaç, Küreçayı and Bağdere were affected by the Project's forestry and treasury land acquisition. Mukhtars of affected settlements were consulted in order to determine the users of acquired public land. The muktar and key informant interviews did not reveal any individual users of public land, and emphasized that the use of common land was used by some of the PAPs on an informal basis without any legal tenancy agreement with the public authority.

During socio-economic baseline data collection and consultation process, emphasis was given to understanding the existing vulnerable groups and groups that may risk falling into vulnerability as a result of Project's land acquisition. Consultations with women and elderly were held to reflect their concerns/demands and any adverse impact the Project may pose on them.

The median household size is 3² and the average age in project area is 41. Most (86%) of the interviewed households, has a family member over the age of 60. Elderly PAPs live in a traditional family setting, with their children. There has been a decrease in population in Project Affected Settlements (PAS), especially in the rural settlements in line with the general trend in Turkey in the last 30 years. Thorough meetings with mukhtars revealed that 193 households have left Project affected settlements (PASs) and moved to Istanbul or Ankara primarily due to economic causes; such as financial difficulties, lack of employment opportunities and lack of land. 8% of the population is illiterate. All illiterate population is over the age of 65. Agriculture and livestock are important livelihoods in PASs. According to the surveys conducted in PASs, most (86%) of the households engage in agriculture³.

Pastures are vital for livestock producers. Consultations revealed the importance of pastures for communities. XXX In total 0.2 hectare pasture land used by approximately 20 households in living in 1 village (Derekoy village of Vakıfgeymene) is acquired by the Project. **Acacia Mining Operations purchased alternative land which will be used for grazing purposes in order to minimize the impact on livestock production and the Project team is also at the stage of purchasing additional land to build access road to the alternative pasture land.** Provision of an alternative pastureland for the communal users aims to enable sustainable livestock production in project affected communities. In addition to this AMI will also implement a pasture improvement program. This program entails improvement of pasture productivity and hence increases income gained from livestock production.

The project analysed the priorities of the PAPs for livelihood restoration measures during SIA process; top priority of PAPs was income-generating agricultural and livestock activities. The mitigation measures recommended by PAPs can be summarised as; infrastructure supports, income-generating activities (agriculture) and local employment. AMI has developed an entitlement matrix that provides in-kind and cash based compensation packages. In line with consultations⁴ with PAPs, LRP offers the following schemes:

² Half of the responding Households comprised of 2-3 people per household. 4 households have a size of 4 people and 3 households are extended families with 6 or more residents.

³ Both of the households not engaging in agricultural activities are comprised of elderly persons. Households with labor force conduct agricultural and livestock activities.

⁴ Consultations include household surveys, in-depth interviews, development workshop series, focus group meetings and broad based semi-structured consultations

- Local employment and skill development: PAPs (owners/users of affected lands) are/will be **prioritized** for local employment during construction and operation periods. AMI will organize vocational training and skill development courses in order to establish a qualified work force in the region.
- Support to agricultural activities: AMI will also support livelihood restoration through various development initiatives. AMI is exploring partnerships, and engaging with key public stakeholders such as District Department for Agriculture in order to devise and implement fully established programs. AMI will also allow people to utilize the land parcels in Yılanlı District (which was purchased by the project as a safety zone in the down stream of TSF1), for agricultural development and livestock production.
- Support to local businesses through local procurement: AMI and subcontractors will prioritize local procurement in order to boost local economy and support local entrepreneurship.

The Project's vulnerable groups include the elderly, the landless and single headed women. The Project plans to conduct special communication activities for vulnerable households in order to ensure their active engagement in project activities. Vulnerable groups will be informed with a household-oriented approach and benefit from livelihood restoration programs and social responsibility assistances of AMI. In order to create equal opportunities for women in employment- special training and capacity building activities will be designed and implemented for women in the project region. i.e.

Support to capacity building activities targeting women are being conducted together with Hanönü Association for Women's Solidarity, which was founded with the support of the Project.⁵

Vulnerable groups (the elderly and/or poor) will be provided in-kind household supplies and heating assistance. Identified number of vulnerable PAPs is 15 which 12 of them have vulnerability due to age. Nonetheless, vulnerable groups will be regularly visited and monitored to ensure that their livelihoods are not adversely impacted by the Project.

A Stakeholder Engagement Plan (SEP) is prepared for the Project and aims to designate the stakeholders and to define their roles and engagement capacities. SEP defines communication ways with the stakeholders and draws a road map for the Project to succeed, with respect to the options and restrictions of engagement, so that the Project can continue in a transparent, inclusive, cooperative way that responds to the requests of the public. There is a separate Community Relations Office in Hanonu District that enables easy access to AMI Social Team. There is a designated phone line and e-mail address for communication.

In line with the international requirements, Acacia Mining Operations established a grievance mechanism to receive and respond to the complaints and concerns of the Project affected population and all other stakeholders. This mechanism aims to manage the Complaints from stakeholders of GCP, including Project Affected Persons, Non-Governmental Organizations, workers, third parties and other members of the community; and to designate the process and

⁵ Please see Women's workshop findings at Annex 4.a

liabilities to follow. All complaints regarding land acquisition, except those brought to the court, are to be collected and resolved through the grievance mechanism.

Project has a monitoring and evaluation mechanism in place to ensure all commitments in the LRP is implemented successfully; indicators for internal and external monitoring, frequency for monitoring and responsible parties are established for effective monitoring and evaluation.

LRP has a budget, itemized to reveal costs related to land acquisition, and LRP activities. There is a schedule for LRP presented at the final chapter.

Introduction and Project Information

1.1. Introduction

The Livelihood Restoration Plan (LRP) for Gökirmak Copper Project (GCP) is a comprehensive plan that addresses economic displacement of Project Affected Persons (PAPs) due to land acquisition triggered by the Project. The LRP defines the procedures to follow regarding land acquisition and/or land use, provides legal background, depicts land acquisition required by the Project, sets socio-economic baseline for PAPs, establishes entitlements and compensations for economic displacements, devises mitigation mechanisms to reduce/minimize potential adverse impact, discusses stakeholder engagement and grievance mechanisms, identifies programs to restore PAPs livelihoods with a LRP budget and sets forth monitoring and evaluation mechanism.

LRP is drafted in accordance with the requirements of Turkish legislation, social and environmental policies of Acacia Mining Company ("AMI" or "Acacia" or the "Company"), EBRD Performance Requirements, IFC Performance Standards and Equator Principles.

This LRP is devised to address the land acquisition impacts of all Project and associated facilities within the mine including ELT and river diversion. A separate LRP is prepared for the associated facility (ETL) which is presented in Annex 1 of this document.

Land acquisition for the first phase of the Project was completed by 2016. LRP retroactively assessed the land acquisition process and how it was carried out by AMI and whether any gaps exist between the AMI process and land acquisition requirements according to EBRD PR 5. The Project's land acquisition comprises of public and private land and the Project in its current design does not entail physical resettlement. Depending on Project needs, in future phases Project may acquire additional land or assets that may be affected due to mine operations. Land acquisition will be conducted according to Acacia Land acquisition policy which follows European Bank for Reconstruction and Development (EBRD) Performance Requirement 5 (PR5). Should the Project require additional land acquisition that triggers physical resettlement, the Project will prepare a Resettlement Action Plan according to European Bank for Reconstruction and Development (EBRD) Performance Requirement 5 (PR5).

Acacia is committed to minimizing land acquisition in order to reduce potential economic displacement. Some of the measures included in minimizing Project's land acquisition are as follows:

- Improving the capacity of the Corakoglu Waste Rock Dump in order to reduce land acquisition from other sources for waste rock⁶.
- Utilizing Project facilities for ore storage as opposed to acquiring additional land for ore storage which was included in Turkish EIA report
- Minimizing footprint on Yilanli Forestry area upon PAPs requests by 4.8 ha; and building an additional access road which does not only avoid village traffic but also acts as a fire access road to be used in forest fires.

⁶ The Gelberi WRD has a footprint of approximately 85 ha and the haulage distance from the pit to this area is approximately 3 km. Utilization of Gelberi WRD is not expected since Çorakoğlu WRD's capacity is sufficient. Source: EIA Volume 1

- Decision to cancel use of explosive storage unit
- Preference to use underground tailing pipeline for tailings dismissal from plant site to tailings storage facility.

1.2. LRP Objectives

The main objectives of LRP are as follows:

- To avoid and minimise displacement to the extent possible
- To describe the Project's implications for economic displacement
- To analyze the legislative approach to be followed during the acquisition of immovable assets
- To detail the procedures to be followed in acquiring land and other assets
- To summarize the institutional arrangements for land acquisition
- To describe the socio-economic profile of the affected settlements and Project Affected People (PAPs) through household questionnaires, in-depth interviews, direct observations, and focus group meetings
- To identify current and potential Project impacts and opportunities for income and livelihood restoration;
- To provide information on attitudes towards the Project and on priorities for assistance
- To identify vulnerable groups and to introduce mitigation measures to ensure that they are not adversely impacted from Project's land acquisition;
- To engage the stakeholders in the Project, to convey the Stakeholder relationships the Project has provided for land acquisition;
- To present detailed implementation schedule of the Project;
- To design the monitoring and assessment framework for asset purchase and restoration of incomes/livelihoods.
- To describe grievance procedures
- To present LRP budget.

1.3. Project Information

1.3.1. Brief Project Overview

Acacia Maden İşletmeleri A.Ş. ("AMI" or "Acacia" or the "Company") is planning to apply for a loan to International Financing Institutions (IFIs) for the development of the Gökırmak Copper Project ("GCP" or "the Project") located in Hanönü district of Kastamonu province of Turkey.

Acacia was established in 2007 under the name Asya Maden İşletmeleri A.Ş. In 2011, an initial partnership was formed with İlbak Madencilik Sanayi ve Ticaret A.Ş. Following a partnership deal with Akfen Mühendislik A.Ş. in 2016, the Company is currently conducting its operations under its current name, Acacia Maden İşletmeleri A.Ş..

GCP is an open-pit copper mine project and involves land preparation phase and the construction, operation and closure of the following main units:

- Open Pit
- Process Plant
- Çorakoğlu Waste Rock Dump (WRD)

- Kepezkaya Tailings Storage Facility (TSF)
- Tailings Pipeline
- Other auxiliary facilities (administrative building, warehouse, topsoil storage areas etc.)

In addition to the main units, the associated facilities of the Project are as follows:

- Gökırmak River Diversion System
- 28.8 km 154 kV Energy Transmission Line (ETL)

The Project's construction phase is planned to be finalized in the first quarter of 2018, followed by an estimated production life of 11.3 years. The reclamation will go parallel to operation activities and the mine closure period will continue for an additional 2 years following the end of operation phase.

The selected mining method is open pit mining and a total of 22 Mt of ore at 1.50% Cu is planned to be produced. As a result of ore production, 2 Mt per annum ore will be fed to the processing plant. The processing plant is expected to operate at 85% recovery, having a total production of approximately 1,278,703 tonnes of dry concentrate with a copper grade of 22.0% throughout the life of the mine. Approximately 282.2 million tonnes (Mt) of waste rock will be generated as a result of open pit activities and the waste rock will be deposited at Çorakoğlu WRD.

1.3.2. The Location of the Project

The Project is in Hanönü district of Kastamonu province. Hanönü district is a small settlement between Boyabat district of Sinop province and Taşköprü district of Kastamonu province. Before getting the district title on May 20, 1990, it became a municipality on December 10, 1988. Prior to that, it was a village of Gökçe ağaç sub-district of Taşköprü district of Kastamonu province. It currently has 20 villages and 3 neighbourhoods.

Map1.1. Hanönü district.

Location of district and province



Taşköprü is Hanönü's neighboring district, and Taşköprü District center is approximately 30 km away from Hanönü district center, while Boyabat is 37 km away. Thus, the Project is not set in a remote location; yet it is set in a location that has rural qualities.

Table1.1. Geographic Position of Hanönü.

Distances between Hanönü and Neighboring Districts	Km	ETA (minutes)
Taşköprü	30	30
Kastamonu Central District	80	60
Boyabat	37	30
Sinop-Central District	111	90

1.4. Project's Area of Influence⁷

GCP Social Area of Influence is defined in the Social Impact Assessment (SIA) Report of the Project. LRP focuses on impacts of loss of land (private/public) on PAPs. There are 4 directly affected settlements, 2 of which are neighbourhoods and 2 are villages. These settlements have a total of 11 sub-settlements. These settlements are directly impacted by Project activities such as land acquisition, employment and local procurement.

Table 1.2. Hanönü settlements affected by the Project

N o	Directly Affected Settlements	Sub-Settlements Affected by the Project	Population (2016)	Impact from Project Facilities	Likely Impacts	Livelihood
1	Hanönü Merkez Neighborhood	Vakıf, Merkez	Yılanlı, 1821	Loss of land due to TSF	Loss of private land Loss of forestry land Local recruitment Local procurement Community health and safety	
2	Vakıfgeymene Neighborhood	Dereköy, Sepetçioğlu, Geymene	80	Loss of land to Open Pit	Loss of private land Loss of pasture Sense of place change Community health and safety Local recruitment Partial loss of water supply	
3	Bağdere Village	Çaylı, Bağdere	Çayağzı, 122	Loss of land to Processing Plant	Loss of access to public land Sense of place change Local recruitment Community health and safety	
4	Küreçay Village	Aşağıküreçay, Küpeli	161	Loss of to Waste Rock Dump site	Loss of access to public land Loss of pastures Potential influence on local water source (Kupeli)	

⁷ IFC defines Area of Influence (IFC PS 1 Para 8) as: The area likely to be affected by (i) the project and the client's activities and facilities that are directly owned, operated or managed (including by contractors) and that are a component of the project; (ii) impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or (iii) indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are dependent. Associated facilities, which are facilities that are not funded as part of the project and that would not have been constructed or expanded if the project did not exist and without which the project would not be viable. Cumulative impacts that result from the incremental impact, on areas or resources used or directly impacted by the project, from other existing, planned or reasonably defined developments at the time the risks and impacts identification process is conducted.

5	Hanönü District	District	3,865 ⁸		Local recruitment Local procurement Increased traffic Workforce influx
6	Taşköprü District	District	39,847	Project facilities Transmission lines land acquisition	Local recruitment Local procurement Workforce influx

Source: SRM, 2017

AoI includes directly affected settlements, and indirectly affected settlement. Indirectly affected settlements are those neighboring directly affected settlements which may be impacted from Project's employment opportunities. Hence, Hanönü district overall was included in the area of influence. In addition to Hanonu district, Taşköprü district is expected to be impacted by the Project due to employment, housing and local procurement. Hence AoI includes two districts from Kastamonu province.

1.5. Project Affected Person (PAP)

PAPs are those persons who lose their right to own, use or benefit from loss of access to land or other immovable assets due to Project's land acquisition. Hence, PAPs comprise of owners of private land, users of private land, shareholders/ sharecroppers of private land, individual users of communal assets (such as pastures, Treasury land, forestry land) and/or communal users of common assets.

Project's total land acquisition covers 4,122 decares in 610 parcels. 79% of the project affected land is forestry land, followed by Private land (13 Percent), and Treasury lands (6 Percent). Private lands constitute a small portion in the total Project area. Land distribution is shown in Table 1.4. Land acquisition for private parcels impacts 117 PAPs, yet due to migration over the years majority of PAPs (77%) are either non-residents or temporary residents. There were 20 permanent resident PAH, and 7 seasonal PAHs who have lost private land to the Project.

Table1.3. Project affected land distribution according to type of Land.

	Land acquired for the Project (in decares)	Total available land size in the Project area	% Land acquired (acquired land/total land size)	Distribution of Project's overall land acquisition
3rd party (Including pastures)	33.99	788.60	4%	0.5%
Municipality	20.31	n/a	n/a	1%
Treasury	232.90	n/a	n/a	6%
Forestry	3,251.80	275,365	1%	79%
Private Land	537.56	9,450	6%	13%
Unregistered(riverbed etc)	45.77	n/a	n/a	1%
Total	4,122.33			

⁸ This figure includes the population of above four settlements

1.6. Land Acquisition Background

Acacia Mining Operations initiated the land acquisition process following project investment decision in August 2013. Meetings were held with public institutions, mukhtars and stakeholders that could be affected by land acquisition. The land acquisition process was initiated in 2013 and lasted until the end of 2016. Private land acquisition was carried out through willing buyer seller agreements. **Almost 300 decares of private land in 91 parcels were acquired through willing buyer seller agreements. All parcels for Project's main facilities were acquired through willing buyer seller agreements, except for Energy Transmission Line (ETL) by the Turkish Electricity Distribution Corporation(TEDAS).** 224 decares of land impacting 357 parcels affected from the ETL were expropriated and all fees were paid to the parcel owners. Public land acquisitions were carried out within the framework of the local legislation, all payments were made to responsible authorities.

Table1.4. Project affected land distribution according to type of acquisition and number of parcels.

Land Type	Ownership (decares)	Easement (decares)	Total (decares)	land	Number of parcels
3rd party	–	33.99	33.99		22
Municipality	–	20.31	20.31		12
Treasury	–	232.9	232.9		35
Forestry	–	3251.8	3251.8		10
Private Acquisition	299.84	–	299.84		91
Private expropriation*	–	224.45	224.45		357
Private leased	–	13.27	13.27		10
Unregistered (riverbed etc)	–	45.77	45.77		73
Total	299.84	3822.49	4122.33		610

*Expropriation is only triggered for ETL by the TEDAS

Source: Acacia Mining Operations, 2017

Land acquisition process is elaborated in Chapter 4.

1.7. The Scope of Livelihood Restoration Plan (LRP)

LRP was drafted in accordance with the EBRD Performance Requirement 5 to mitigate any potential negative effects of land acquisition on the PAPs and explore development opportunities in order to restore livelihoods of the PAPs at the pre-Project level or better. Within the scope of LRP, a land and immovable property acquisition procedure was prepared for Acacia Mining Operations that identifies the policies, and procedures Acacia Mining will adhere to in case of new land acquisition is triggered. \

LRP addressed all land impacts required for the construction, operation and closure of the following main units:

- Open Pit
- Process Plant
- Çorakoğlu Waste Rock Dump (WRD)
- Kepezkaya Tailings Storage Facility (TSF)

- Tailings Pipeline
- Other auxiliary facilities (administrative building, warehouse, topsoil storage areas etc.)

In addition to the main units, the associated facilities of the Project are as follows:

- Gökırmak River Diversion System
- 28.8 km 154 kV Energy Transmission Line (ETL)

LRP identifies vulnerable groups and brings forth measures to ensure that vulnerable groups do not suffer from Project's potential adverse impacts. LRP follows a gender sensitive approach throughout consultations, livelihood planning and Project development. Separate consultations with women were held in order to ensure that concerns and requests are well reflected in planning.

LRP also defines the procedures concerning livelihood restoration processes in GCP and presents a detailed socio-economic profile of the area. Quantitative analyses of socio-economic surveys with Project Affected Households (PAH) were combined with the qualitative outcomes of thorough meetings. Consultations were held with Non-Governmental Organizations (NGOs) and private sector stakeholders to prepare an LRP that would set mechanisms that not only present the priorities of PAHs but also mitigate potential negative effects.

Consultations for LRP

In order to devise LRP, 3 development workshops were conducted with support from AMI between 2015-2017. The goal of the workshops was to bring all stakeholders from Hanonu and Kastamonu in order to explore the benefits/adverse impacts of the Project, and to devise mitigation mechanisms through a collaborative and participatory effort. The workshops were actively attended by PAPs, mukhtars, mayor, governor, University, District Directorate for Agriculture, District Directorate for Forestry, Women's Cooperative etc. First two workshops are completed and their results are embedded in this report along with separate reports on proceedings. Stakeholder consultations chapter explains in details the "Hanonu Development Workshop Series". The proceedings of the workshops and women's cooperative form the baseline for livelihood restoration programs since these workshops were the first ever development focused engagement in Hanonu to assure that AMI GCP will benefit the community.

LRP discusses grievance mechanism⁹ to be implemented by AMI, and establishes monitoring and evaluation for successful implementation of the plan. Finally, a draft budget that lists the costs of all items budgeted for LRP activities is included in this report.

LRP reflects the principles in Figure 1.1, in parallel with Equator Principles and EBRD Performance Requirements.

⁹ Stakeholder engagement plan(SEP) details of the grievance mechanism for the Project

Figure 1.1. LRP principles.

Livelihood Restoration	Stakeholder Engagement	Monitoring and Evaluation
<ul style="list-style-type: none"> •The land shall be valued over its full replacement cost and transactional costs. • The Project shall provide additional and planned supports and opportunities to PAPs so they can restore and, if possible, improve their livelihoods, income levels and living standards. 	<ul style="list-style-type: none"> •There shall be constant information flow and consultation process with all the stakeholders regarding the Project •Information and consultation for vulnerable groups shall be carried out in line with SEP. •All stakeholders shall be engaged in the Project. •Necessary communication/contact means shall be established to ensure stakeholder engagement. •There will be sound grievance mechanism system shall be established for stakeholders to submit their complaints/requests. 	<ul style="list-style-type: none"> •LRP will be continuously monitored both through internal monitoring and external monitoring • LRP is a living document and Programs will be adjusted according to results of the M&E •Particular attention will be given to monitoring of vulnerable groups

LRP covers the following chapters:

Chapter Two: Covers the legal framework on land acquisition, resettlement and fee procedures and World Bank, EBRD, IFC Policies and Equator Principles on these procedures;

Chapter Three: Provides detailed socio-economic information on the Project affected population and the current socio-economic status of the Project affected area;

Chapter Four: Presents effects caused by all immovable property losses that cover current and potential effects possibly caused by the Project, production assets, buildings and infrastructure.

Chapter Five: Defines livelihood restoration program components, presents the "Entitlement Matrix" and in-kind compensation packages that will be provided within LRP.

Chapter Six: Explains grievance mechanisms, PAH meeting and informing procedures and stakeholder consultation activities under LRP;

Chapter Seven: Summarizes the monitoring process and the monitoring and assessment mechanism that the experts will use while conducting the LRP;

Chapter Eight: Explains budget details necessary for LRP expenses, land acquisition procedures and all activities conducted after these procedures; and

Chapter Nine: Submits the related information to the parties responsible during the implementation period and RAP implementation schedule.

2. Chapter 2 Legal Framework

This chapter covers the main policy and legal framework concerning land acquisition, expropriation and forced resettlement which will be valid for GCP in Turkey. EBRD policies, and a summary of the gaps with Turkish legislation and EBRD are provided in this chapter. The basic legal framework for land acquisition, which is covered in this chapter, is as follows;

- Turkish legal framework
- Willing buyer seller and expropriation under Turkish legal framework
- Valuation and compensation for private parcels/land for willing buyer seller purchase
- Valuation procedure for expropriation
- Land Acquisition procedure conducted by TEDAS (energy transmission lines)
- Land acquisition for treasury land
- Land acquisition for forestry land
- Land acquisition for pasture land
- Land acquisition for graveyards
- Sustainability Framework of EBRD
- Human Rights Aspect
- Gaps with Turkish legislation and EBRD

2.1. Turkish Legal Framework

There are number of pieces of legislation that are applicable to the process of Land Access and Resettlement. Turkish legal framework does not have one law that governs mining and land acquisition in Turkey. Available legislation includes, but are not limited to:

- Constitution of Turkey, Article 168 regarding the ownership of natural, sub-soil resources
- Mining Law 3213 and its subsequent Amendments
- Resettlement Law 2510
- Expropriation Law 2942 and its subsequent Amendments
- Pasture Law 4342 and its subsequent Amendments.

2.1.1. Willing buyer seller and Expropriation under Turkish legal framework

Turkish Mining Law number 5177, dated May 26, 2004, Article 20, amending the previous Mine Law (Numbered 3213 and dated June 4, 1985, item 46) provides that Mining companies can negotiate with landowners for purchase of their land. If they are unable to agree, the Company can apply to the Ministry of Energy and Natural Resources for a finding that the project is economically necessary for the country. In the event of such a finding, the Government can expropriate the land for the mine as per the Expropriation Law (No. 2942) and its subsequent amendments, and the company will pay all expenses thereof. The objective for GCP is to negotiate with all the private land owners of the impacted communities in a cooperative and satisfactory manner as developed in this LRP.

In the case of GCP, land acquisition was/will be made primarily by willing buyer seller purchasing in all project components except for cases and parcels unsuitable for willing buyer seller purchasing option.

2.1.2. Valuation and compensation for private parcels/land for willing buyer seller purchase

Acacia Mining Operations will establish a two-step value assessment process for the project land acquisition activities (willing buyer seller) which will be explained in detail under Chapter 4. The valuation process starts with preparation of an asset inventory of the land that will be acquired. The inventory is prepared by an independent asset valuation company. The inventory contains all affected assets present on the land including lands, houses, other structures, trees, vineyards and other immovable assets. Asset valuation company comes up with reliable estimates for values of the assets, following comprehensive meetings with real estate agents, agriculture experts, related local administrative directorates and non-governmental organizations.

An assets inventory is also required by the Expropriation Law (No. 2942), which also provides that in the case of expropriation, the price of easement or usufruct rights will be determined by experts to be appointed by the Ministry of Energy and Natural Resources General Directorate of Mining Affairs of Turkey ("MIGEM").

As a second step, Acacia Mining will then negotiate with the PAPs and acquire land based on willing buyer seller negotiations based on compensations calculated by asset inventory that abides by EBRD's full replacement cost plus any transactional costs.

2.1.3. Valuation procedure for expropriation

As per Article 15 of Expropriation Law, court officials will visit the related site with the members of the value assessment Commission, after the Court is notified of the expropriation request. As per Article 11 of the Law, the Commission will comprise of 3 or more experts; more than one Commission may work depending on the number of affected parcels. During the value assessment process, local branches of the Chambers of Trade and Industry, local real estate agents and other related bodies are consulted and the following criteria are taken into consideration:

- Quality of the land or building;
- Size of the land or building;
- All features and issues that can possibly affect the land or building, including separate values;
- Taxes related to the land or building;
- Previous amounts set for expropriation value;
- Net income that may be provided by the asset and/or resource;
- Unit prices on the expropriation date (set by the Ministry of Public Works and Settlement) and estimates for reconstruction and depreciation costs in terms of buildings;
- All objective factors (criteria) that may affect the value of the asset and benefit the property owner.

The legal framework will protect the affected persons by meeting the following conditions:

- No land will be used until the fee is paid;
- In the case of conflictual property, the fee will be paid to a national bank account or a trustee;
- If the payment is delayed for any reasons, market based interest rates are taken over the fee;
- All types of property are recognized, including practice and traditional property;
- Fees regarding the legal procedure are paid by the expropriation institution (transferred to Acacia Mining Operations), not the affected persons.

In the public related expropriation process, incomes from affected immovable assets are taken into consideration; yet the term "**full replacement cost**" is not used in the related Laws and depreciation is taken into consideration. Thus, Acacia Mining Operations will clearly state the full replacement cost for buildings and ensure that the lost income is fully compensated in the process. From the perspective of those who are vulnerable and have low income, regaining additional livelihoods measures are being drafted to provide employment, including in construction sector.

Net income approach is used for determining the value of agricultural lands. Net income is the income the land will provide in case of the land and resources in the date of expropriation are continued to being used, with regard to the location and conditions thereof, without any changes. The value assessment Commission will figure the average annual net income of agricultural lands through primarily meetings and market study. Market prices for lands are determined through studying the market and land certificates. The average annual net income/market price ratio will produce the capitalization ratio. The capitalization ratio will give the replacement cost of the land to expropriate, as it is calculated in line with the actual market prices for expropriation.

The formula to agricultural lands' value assessment is $K=R/f$; where,

K= Cost (expropriation fee),

R= Net income (gross income- production expenses) and

f= capitalization ratio (the risk regarding the capital invested in the agricultural land).

The value assessment Commission (value assessment performed by the operating independent private company, in cases of acquisition through consensual purchase regulations) performs field surveys and determines features that can affect the expropriation fee of immovable assets, such as soil structure, usage, topography, climate, distance to nearby settlements, roads, irrigation systems, easy access, location and effective rotation systems of the region. Also, experts consult local institutions as well (the local Chamber of Agriculture, the district/province directorate of agriculture etc.). To calculate the net annual income, the productiveness of crops (in the rotation system of the expropriation field) is multiplied by the annual cost comprising

the gross production value. Then, all expenses¹⁰ are subtracted from the gross production value, which give the net income¹¹.

Moreover, the income approach is also used for value assessment of fruit orchards and vineyards. If the said land is a fruit orchard; production and expenses are compared with all previous years. These balance sheets are effectuated at the end of the economic life of fruit orchard, with interest rates; and the land's empty value is obtained by dividing this number by the capitalization ratio. Past or future value approach will be used for determining the total land value. When tree values are calculated instead of the land; empty land value will be subtracted from total land value. Then the result will be divided by the number of trees to obtain the value of a single tree. If the orchard is yet a nursery garden, the cost approach should be favored¹².

Within the framework of Article 10 of Expropriation Law; value assessment Commissions will be formed in January of each year, composing of 5 primary and 5 substitute members, in both rural and central regions. Commissions will make decisions based on majority of votes; opposing members will submit reports justifying their objection. When the Directorate General of National Property enforces Article 7 of the Law and reports the value of the assets by enforcing Article 8 through collecting data on affected parcels, it can go to a court of law and demand that the value of assets be determined. Following 30 days after the request of Directorate General of National Property, the Court calls the property owner for a meeting where parties will initiate negotiations. If a conflict arises from this, the judge will appoint an expert group within 15 days and demand that the parties attend court hearings within 30 days. Then the Court reaches a final decision and the Directorate General of National Property pays the amount to accounts of property owners. Acacia Mining Operations does not get the related possession until the judicial process stated in Article 10 is concluded and fees are paid to accounts in line with Article 27. Though the Law states certain deadlines, many decisions take much longer than anticipated, especially when property owners cannot be located or joint owners have disputes.

2.1.4. Land Acquisition procedure conducted by TEDAS (energy transmission lines)

Turkish Electricity Distribution Corporation (TEDAŞ) carried out the land acquisition necessary for the energy transmission lines. TEDAŞ is responsible for businesses and operations related to the energy lines. While choosing the route for energy transmission lines; TEDAŞ tries to avoid settlement areas and residential districts, not cross houses or other structures. If these are not

¹⁰ Including annual operation expenses, 10% unknown expenses, 3% management share and interest rates of agricultural investments.

¹¹ This value assessment method is also used for pasture lands, common lands of villages. Costs of pasture lands are paid to the village legal person, to be used for the village's interest. In the event that the legal person is recalled, the said amount is transferred to the district governorship.

¹² Income flow is capitalized to assess the empty land value of a timber grove. To this end; the number of trees, daily wage of workers, fertilizer and pesticide prices and balance sheets of lands are analyzed. Expenses are calculated by the end of operation period, through real interest rates. To calculate the gross production value, unit price of wood is multiplied by productiveness. To calculate the net income, all expenses (end operation period) are subtracted from the gross production value. To create the empty land value, this net income is capitalized.

possible, TEDAŞ pays necessary attention to expropriation, keeping technical needs at their minimum and following the best examples of international policies on protection of the environment, forests, sites and such natural structures. Necessary operations for transmission lines are set in line with Turkish laws and legislation and World Bank OP 4.12 Involuntary Resettlement and selected activities are compatible with related legislation. The acquisition of fields where energy transmission lines will be placed depends on the implementation of one or several of the following laws;¹³

- 1- Article 46 of the Constitution,
- 2- Expropriation Law No. 2942 amended by the Law No. 4650,
- 3- Electricity Market Law No. 4628,
- 4- Civil Code No. 4721,
- 5- Decree Law on State Economic Enterprises No. 233,
- 6- Main Status of our Enterprise published on 29.06.2001,
- 7- Other related legislation such as Construction Zoning Law, Cadastre Law, Forest Law, Pasture Law, Organized Industrial Zones Law, Environmental Law, Agricultural Reform Law etc.

Project affected persons are the owners of the immovables on the route of energy transmission lines. These persons are selected at the end of drafting the application and expropriation plans of the invested project. Lands lost in narrow lines are usually restricted to pole areas, agriculture is still possible in these lands during and after construction. Past/future expropriations conducted by TEDAŞ do not require physical resettlement. Because expropriated pole areas cover a very small area (between 150 – 250 m²) and lands under the transmission wires do not switch owners through expropriation, only get a right of way. Both settlements and agricultural activities can go on with this right.

Land acquisition concerning the project was performed according to the ***urgent expropriation article of the Expropriation law***. Accordingly, types of project affected land cover

- Privately owned lands,
- Forestry lands,
- Treasury lands,
- Pasture areas,
- Areas that belong to village legal person,
- Areas that belong to third party institutions (Hanönü Municipality and TEİAŞ) within the scope of Article 30 of the Expropriation Law.

2.1.4.1. Key Elements of Urgent Expropriation Procedure (UEP)

The steps of the UEP process for a private sector investor are as listed below;

1. The TEDAS applies to the relevant public authority (EMRA), i.e. a regulatory agency or local government, for urgent expropriation of immovable properties on which the project will be located.

¹³ <http://www.teias.gov.tr/KAMULASTIRMA/PDF/arsaedinimi.pdf>

2. A “Public Interest Decision” (PID) is taken by the administration as a requisite for requesting the Council of Ministers to take an “Urgent Expropriation Decision”. The PID is to be approved by the local government where the project is located.
3. An “Urgent Expropriation Decision” is issued by the Council of Ministers, effective by the Official Gazette publication date.
4. TEDAS conducts another decision for the start of expropriation process, i.e. UEP and prepares or have others to carry out a scaled plan (which is called expropriation plan) including borders, surface area and type of immovable properties or resources and list of owners or possessors of such properties in case there exist no registered title deed and their addresses. In practice, administrations make this plan prepared by the private sector investors.
5. TEDAS requests the local civil court of first instance to initiate the immediate seizure of the target property (First Lawsuit).
6. The local civil court establishes a valuation committee who determines the price within seven days. The administration deposits the determined amount in the name of the owner. The usual practice is that the requesting private entity investor covers the cost of expropriation.
7. Local civil court notifies/invites the owner either in writing (if the contact addresses of the owners available) or via newspaper announcement. Such an announcement includes information about the bank where the money has been transferred.
8. At this stage, the parties can reach a settlement. If a settlement agreement is signed, the expropriation process is completed with the payment of the agreed settlement price and the registration of the property in the name of the public authority at the local Title Deed Registry. If not, the process continues with administration’s appeal to court for completing the expropriation process pursuant to Article 10 of the Expropriation Law (Second Lawsuit).
9. However, regardless of whether or not a settlement is reached, seizure is made after the amount specified is deposited by the administration in the name of the owner. Following the seizure order of the court, utilization rights is formalized between the public authority and private entity investor. The investor can begin to utilize the relevant target property.
10. If needed, the administration entitles the Execution Office under local Administration of Justice to evacuate immovable property within 15 days. In practice, administrations and investors try to execute a peaceful evacuation process by informal consultation and assistance. In case of the cultivated land to be evacuated, the cost of the crop is compensated before evacuation

The key differences between regular expropriation procedure and Urgent Expropriation are:

1. A regular expropriation procedure requires i) preparation of an expropriation plan and ii) the appraised value to be negotiated with the owner for the purpose of purchasing the property prior to commencing an expropriation lawsuit. Under the Urgent expropriation, in practice, the public authority is able to apply for Urgent expropriation without an expropriation plan¹⁴ and the mandatory process of negotiation is bypassed.
2. Under Urgent expropriation, the immediate seizure process (First Lawsuit) is limited to an appraisal of the property and therefore, the judgment cannot be appealed by the

¹⁴Yazicioglu, Sami Saygin; Expropriation law urgent expropriation application
<http://www.ankarabarasu.org.tr/site/ankarabarasu/tekmakale/2014-3/14.pdf>

parties and regular expropriation steps of submission of the claims and defenses and objection against the estimated compensation amount are not allowed at this stage.

3. In regular expropriation proceedings, the entities requesting the expropriation cannot start utilization of the target property until all the steps of the expropriation are completed including the title deed transfer. However, in Urgent expropriation, public or private entity investors can start to use or conduct right of use of the relevant target property only based upon the seizure order of the court without title deed transfer.
4. The Urgent expropriation requires two court appeals by the administration while regular expropriation procedure is concluded after only one court appeal. The first court appeal of the Urgent expropriation is for immediate seizure of the property and the second for completing the expropriation process and transfer of title deed (Article 10 Lawsuit).

An additional LRP was prepared for the Energy Transmission Line, within the scope of GCP. ANNEX 1 of this LRP includes the LRP for Energy Transmission Line.

2.1.5. Land acquisition for Treasury land

According to the Mining Law and regulations, lands under private ownership of the Treasury or under the control and disposition of the State will be deemed to be allocated for mining, and no charges for use of such places or no other payments for any reason may be demanded.

2.1.6. Land acquisition for forestry land

In line with the Forestry Law, to operate in forestry lands; permission of the Ministry of Forestry and Water Affairs Directorate General of Forestry is required and damages in public forests caused by the Project construction will be compensated. As per Law No. 6831, the Ministry of Forestry and Water Affairs Directorate General of Forestry has the right to give permission to use forestry lands.

As per the Turkish judicial system, user of government's pasture and forestry lands will not be compensated for land acquisition. Acacia Mining Operations will operate differently on this aspect, as Acacia Mining Operations will pay the forestry, pasture and treasury land users for immovable assets in full, including cultivated corps.

Forestry Law No 5192 (Official Gazette No. 25511 of July 3, 2004) states; "In the event that facilities of defense, transportation, energy, communication, water, waste water, oil, natural gas, infrastructure and solid waste disposal; sanatoriums, dams, ponds and graveyards; Government health, training and sport facilities are located on Government forests or necessary to be built for public interest; the Ministry of Forestry and Water Affairs may give permission to real and legal persons." In line with this Article, Acacia Mining Operations applied to the Ministry of Forestry and Water Affairs.

As per Article 60 of Chapter 12 of the Regulation on Forestry Land Permits (Value Assessment Principals), Acacia Mining Operations plans to pay the set value, including expenses of reforestation, facilities and costs of land permit and warrants.

2.1.7. Land acquisition for pasture land

Pasture Law No. 4342 states that based on the opinions of the Pasture Commission (composed of the director from the Ministry of Forestry district/province directorate, one agricultural

engineer, one legal expert, one representative from the National Directorate of Real Estate, one technician from the Directorate of Land Registry and Cadastre and one representative of the Chamber of Agriculture) and revenue administration, district governorship has the right to give permission for changing the use of pastures.

Officials of the Provincial Food Agriculture and Livestock Office will visit the Pasture Land for which access permission is applied and carry out a Pasture Land valuation to determine the lease price. According to Turkish Law (regulations for Pasture/Meadows), the government needs to obtain the approval of each farmer benefiting from this land. In practice however, it is unlikely that objections to the usage of State Pasture Land by the project will negatively influence the permitting process¹⁵.

Once usage rights are approved, the project may use Pasture Lands in the license area upon paying a one-time rental fee payment, valid for 20 years. Subsequently, the applicable lands will lose their status as Pasture Land and become State Treasury Land.

2.1.8. Land acquisition for graveyards

Within the framework of Law on Protection of Graveyards No. 3998, investment affected graveyards need to be relocated in coordination with municipality or village offices. As per Article 30 of Expropriation Law, the previous land will be transferred to the Treasury after the relocation takes place.

2.2. International Policies

Acacia Mining Operations drafted their land acquisition and livelihood recovery procedures in line with international policies. Among these policies is European Bank for Reconstruction and Development sustainability framework and performance requirements, Equator Principles and IFC sustainable principles.

2.2.1. Sustainability Framework of EBRD¹⁶

EBRD-financed projects are expected to be designed and operated in compliance with good international practices relating to sustainable development. To support proponents, the EBRD has developed an Environmental and Social Policy and 10 related Performance Requirements covering the key areas of environmental and social issues and impact which provide a solid base from which clients can improve the sustainability of their business operations. The EBRD is providing finance for the Project.

The full series of Performance Requirements, designed to improve social and environmental outcomes, consist of the following:

- Performance Requirement 1: Assessment and Management of Environmental and Social Impacts and Issues

¹⁵ Forest Laws No. 3116 and No. 6831

¹⁶ EBRD Performance Requirement 5: Land Acquisition, Involuntary Resettlement and Economic Displacement page 40

- Performance Requirement 2: Labour and Working Conditions
- Performance Requirement 3: Resource Efficiency and Pollution Prevention and Control
- Performance Requirement 4: Health and Safety
- Performance Requirement 5: Land Acquisition, Involuntary Resettlement and Economic Displacement
- Performance Requirement 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- Performance Requirement 7: Indigenous Peoples
- Performance Requirement 8: Cultural Heritage
- Performance Requirement 9: Financial Intermediaries
- Performance Requirement 10: Information Disclosure and Stakeholder Engagement

EBRD Performance Requirement (PR) 5 mentions both physical displacement (relocation or loss of the household) and economic displacement (loss of assets or access to livelihoods or assets that cause loss of livelihood instruments) resulting from the definition of involuntary resettlement and results of losing access to livelihoods due to losing access to natural resources or because of Project related land acquisition.

EBRD defines involuntary resettlement as the case of affected persons or regional people not having the right to object to land acquisition and being forced to displace. This happens (i) when condemnation of expropriation-based lands or land use is restricted and (ii) when the buyer applies for condemnation if negotiations with the seller are not successful or in the case of negotiated solutions for legal restrictions to land use.

Implementation of this PR contributes to human rights and freedoms, guarding especially the right to improve sufficient housing and to constantly improve living conditions, and the right to respect; it is consistent with universal respect.

Where only Economic Displacement occurs, PR5 requires that a Livelihoods Restoration Plan (LRP) is established to outline the entitlements of affected persons and communities and to ensure that these are provided in a transparent, consistent and equitable manner. PR5 states that when Economic Displacement occurs the Project must:

- Promptly compensate economically Displaced Persons for loss of assets or access to assets. This process should be initiated prior to displacement.
- Compensate, in cases where land acquisition affects commercial structures, the affected business owner for:
 - the cost of re-establishing commercial activities elsewhere;
 - lost net income during the period of transition; and
 - the costs of the transfer and reinstallation of the plant, machinery or other equipment, as applicable.
- Provide replacement property (for example, agricultural or commercial sites) of equal or greater value, or cash compensation at full replacement cost where appropriate, to persons with legal rights or claims to land which are recognised or recognisable under national laws.
- Provide assistance that will offset any loss of a community's commonly held resources. This could take the form of initiatives that enhance the productivity of the remaining resources to which the community has access, in-kind or cash compensation for loss of access or provision of access to alternative sources of the lost resource.

- Compensate economically Displaced Persons who are without legally recognisable claims to land for lost assets (such as crops, irrigation infrastructure and other improvements made to the land) other than land, at full replacement cost.
- Provide additional targeted assistance (for example, credit facilities, training or job opportunities) and opportunities to restore, and where possible improve, their income earning capacity, production levels and standards of living.
- Provide transitional support to economically Displaced Persons, as necessary, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels and standards of living.

EBRD values ***stakeholder engagement*** as it makes the people embrace the Project and makes the implementation process more effective. ***Performance Requirement 10 (PR10) deals with information disclosure and stakeholder engagement.*** It applies to all projects that are likely to have adverse environmental and social impacts and issues on the environment, workers or the local communities directly affected by the project. The proponent is expected to identify and engage with stakeholders as an integral part of their overall environmental and social management system, the project's environmental and social assessment process and the development and implementation of environmental and social management plans.

2.2.2. International Best practices: United Nations Guiding Principles for Business and Human Rights (UNGPs)

Although AMI has not signed UNGP it is committed to providing the best practice regarding human rights social aspects. A resettlement process related comprehensive human rights impact assessment¹⁷ should cover these issues primarily: (a) Collecting individual data concerning household structure, assets, living standards, production activities, capabilities, incomes and access to basic services; (b) Collecting individual data concerning livelihood and source of income opportunities, and access of households to opportunities including training and recreation opportunities. This will cover all obstacles and information regarding access to opportunities or resources of all affected persons or certain groups; (c) Collecting data concerning settlement organization, community properties, production activities, capabilities and resources and (d) Collecting data on the exclusion, alienation and other types of discrimination that the affected persons face, including women, children, disabled people, elderly and ethnic minority groups.

Resettlement's potential disproportionate effects on vulnerable and marginalized groups like women and the elderly must be paid special attention. Thus, the Project will handle concerns regarding human rights and ensure collection of data on these concerns. Should there be a social indication that such concerns are true, the Project will draft a strategy for reversing the exclusion, alienation and discrimination caused by resettlement.

A Human Rights Framework was drafted within the context of the Project.

¹⁷ Danish Institute for Human Rights, <https://www.humanrights.dk/business/tools/human-rights-impact-assessment-guidance-and-toolbox>

2.2.3. IFC

The International Finance Corporation's Policy and Performance Standards on Social and Environmental Sustainability have become the international benchmark for good practice on extractive industry projects. The majority of large mining companies and financial institutions funding mining projects seek adherence to IFC standards and the Project intends to apply and comply with these insofar as they relate to Land Access and Resettlement. Central to the standards is the IFC's principle of "do no harm" to people or the environment. Negative impacts should be avoided where possible, and if these impacts are unavoidable, they should be reduced, mitigated or compensated for appropriately. In particular, the IFC is committed to ensuring that the costs of economic development do not fall disproportionately on those who are poor or vulnerable.

The full set of 8 Performance Standards, designed to improve social and environmental outcomes, consist of the following:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 2: Labour and Working Conditions
- Performance Standard 3: Resource Efficiency and Pollution Prevention
- Performance Standard 4: Community Health, Safety and Security
- Performance Standard 5: Land Acquisition and Involuntary Resettlement
- Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living
- Performance Standard 7: Indigenous Peoples
- Performance Standard 8: Cultural Heritage.

Performance Standard 5

Performance Standard 5 (PS5) refers to the management of Physical displacement (i.e. relocation or loss of shelter) and Economic Displacement (i.e. loss of assets or access to assets that leads to loss of income sources or means of livelihood) as the result of project-related land acquisition.

The objectives of PS5 include:

- To avoid, and when avoidance is not possible, minimize displacement by exploring alternative project designs
- To avoid forced eviction
- To anticipate and avoid, or where avoidance is not possible, minimize adverse social and economic impacts from land acquisition or restrictions on land use by (i) providing compensation for loss of assets at replacement cost and (ii) ensuring that Resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected
- To improve, or restore, the livelihoods and standards of living of Displaced Persons
- To improve living conditions among Physically Displaced Persons through the provision of adequate housing with security of tenure at Resettlement sites.

PS5 requires:

- That the project proponent identifies those persons who will be displaced and establish a cut-off date to establish eligibility for compensation

- The project proponent to offer land-based compensation, where feasible, where livelihoods of Displaced Persons are land-based, or where land is collectively owned
- Encourages negotiated settlements to avoid forcible removal of people
- Private sector companies to “bridge the gap” between domestic legal requirements and the requirements of the Performance Standard where necessary

Preparation of a RAP, which demonstrates how displacement will be managed in accordance PS5 further requires that standards for compensation be transparent and consistent within a project, and established with the participation of those impacted. Project proponents must, according to the Performance Standard, offer Displaced Persons compensation for loss of assets at full replacement cost, and other assistance to help them improve or at least restore their standards of living or livelihoods.

If land acquisition for the project causes loss of income or livelihood, regardless of whether or not the affected people are Physically Displaced, project proponents are required to:

- Promptly compensate Economically Displaced Persons for loss of assets or access to assets at full replacement cost
- In cases where land acquisition affects commercial structures, compensate the affected business owner for the cost of re-establishing commercial activities elsewhere, for lost net income during the period of transition, and for the costs of the transfer and reinstallation of the plant, machinery or other equipment
- Provide replacement property (e.g., agricultural or commercial sites) of equal or greater value, or cash compensation at full replacement cost where appropriate, to persons with legal rights or claims to land which are recognized or recognizable under the national laws
- Compensate economically Displaced Persons who are without legally recognizable claims to land for lost assets (such as crops, irrigation infrastructure and other improvements made to the land) other than land, at full replacement cost
- Provide additional targeted assistance (e.g., credit facilities, training, or job opportunities) and opportunities to improve or at least restore their income-earning capacity, production levels, and standards of living to Economically Displaced Persons whose livelihoods or income levels are adversely affected
- Provide transitional support to economically Displaced Persons, as necessary, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living.

PS5 requires that where only Economic Displacement is going to occur, a Livelihood Restoration Plan (LRP) be developed and implemented.

2.2.4. Equator Principles

The Equator Principles (EPs) are a voluntary financial industry benchmark for determining, assessing and managing social and environmental risk in project financing. The EPs were adopted in June 2003 by ten of the world’s leading financial institutions. By May 2016, 82 financial institutions in 36 countries, had adopted the Principles, covering over 70 percent of international project finance debt in emerging markets. The EPs are considered the financial industry ‘gold standard’ for sustainable project finance. The EPs were updated in 2006 and

again in 2013. The EPs, based on the International Finance Corporation (IFC) performance standards on social and environmental sustainability and the World Bank Group's Environmental, Health and Safety general guidelines, are intended to serve as a common baseline and framework for the implementation by each adopting institution of its own internal social and environmental policies, procedures and standards related to its project financing activities. Equator Principles Financial Institutions (EPFIs) commit to not providing loans to projects where the borrower will not or is unable to comply with their social and environmental policies and procedures that implement the EPs. In brief, there are 10 Principles that a project proponent needs to comply with:

1. **Review and Categorisation** – Categorise project as A, B or C depending on the magnitude of social and environmental issues:
 - A – Potential significant impacts and risks that are diverse, irreversible or unprecedented
 - B – Potential limited impacts and risks that are few in number, generally site-specific, largely reversible and readily addressed through mitigation measures
 - C – Minimal or no impacts and risks.
2. **Environmental and Social Assessment** – Category A and B projects require an environmental and social impact and risk assessment.
3. **Applicable Environmental and Social Standards** –
 - In the case of Non-Designated Countries, compliance is required with the IFC Performance Standards and World Bank Group Environmental, Health and Safety Guidelines
 - In the case of Designated countries only host country laws need to be applied as these are considered to be sufficiently developed in the sphere of Resettlement. There are currently 32 Designated Countries (Turkey is not one of these).
4. **Management System and Action Plan** – Put these in place for Category A and B projects.
5. **Stakeholder Engagement** – Informed consultation and participation process for Category A and B projects.
6. **Grievance Mechanism** – Put in place for Category A and B projects.
7. **Independent Review** – Category A and B projects to be reviewed by an independent consultant where project is looking for project finance or corporate loans to ensure assessment and planning documents are in order.
8. **Covenants** – Project will covenant in financing documentation to comply with laws and EPs and provide periodic reports.
9. **Independent Monitoring and Reporting** – Category A and B projects to hire an independent consultant to monitor performance over life of financing
10. **Reporting and Transparency** – ESIA must be appropriately publically disclosed, and there must be annual reporting on implementation of measures.

2.3. Gaps between Turkish law and EBRD Policies

The gaps between Turkish laws and EBRD Policies and project mechanisms for handling these gaps (as far as possible) are summarized in the table below.

Table 2.1. Gaps between EBRD Policy and Turkish Legislation

Key Social Issues	EBRD Policy	Turkish Laws - Related Gaps	Project mechanisms for handling these gaps
Avoidance and Minimisation - Avoid or minimize displacement, where feasible, by exploring alternative project designs	PR 5 Paragraph 11 The impact of resettlement will be prevented or minimized	The Turkish legislation has no provisions about minimizing resettlement/displacement.	Acacia Mining Operations aims to minimize resettlement and has looked at alternative project designs before construction and commits to avoid any resettlement in future or take necessary mitigations like preparing a RAP if displacement is unavoidable
Engagement - Ensure affected community has opportunity for informed consultation and participation in Resettlement planning, decision-making, and execution	PR 5 Paragraph 12 Consultation - All affected stakeholders from the beginning of the Project will take part in the resettlement decision and implementation process.	Turkish laws do not require any social work or consultation before and during land acquisition. As per Article 10 of the Expropriation Law, persons are only consulted in cases of purchasing immovable assets through negotiations.	Acacia Mining Operations has attached great importance to stakeholder engagement from the first stages of the Project and has been informing them about land acquisition with a participatory approach.
Vulnerability - The client will take into account any individuals or groups that may be disadvantaged or vulnerable.	PR 5 Paragraph 13 Disadvantaged or vulnerable groups will be determined in social assessment process and they should be able to equally benefit from the informing process and opportunities.	Turkish laws have no provisions regarding determining disadvantaged or vulnerable groups.	Acacia Mining Operations determined disadvantaged and vulnerable groups during social impact assessment data collection. Communication and measure policies have been developed for vulnerable groups. The Project has social support works regarding vulnerable groups. Vulnerable groups will be monitored in the Project social monitoring process.

Key Social Issues	EBRD Policy	Turkish Laws - Related Gaps	Project mechanisms for handling these gaps
Baseline Data - Conduct a census to identify persons who will be displaced and determine who will be eligible for compensation, provided they are present at a specified "cut-off date"	PR 5 Paragraph 14-15 Socio-economic assessment and count-Project affected stakeholders will be subject to current status detection and assessment, within the context of Social Impact Assessment. This process will determine the persons to be resettled.	The Turkish legislation has no articles mentioning a social impact assessment plan.	Acacia Mining Operations collected socio-economic data about households affected by land acquisition. For any additional land acquisition, asset and social census will be conducted in line with EBRD standards.
Information Sharing and Disclosure -	PR 5 Paragraph 38 The client will summarise the information contained in the LRP for public disclosure to ensure that affected people understand the compensation procedures and know what to expect at the various stages of the project.	Turkish laws have no article about disclosure for land acquisition or Livelihood restoration. Only disclosure requirement is for EIA.	Information sharing and disclosure are key components of Project's LRP and SEP. Vulnerable groups are targeted and included during all information disclosure. Content of information disclosure is culturally appropriate, and delivered in a simple non-technical language.
Full Replacement Value - Where Economic Displacement is unavoidable provide compensation at full replacement value for economic assets	PR 5 Paragraph 17-18 Fee for resettled persons- Full replacement value for their assets and other aids will be offered to resettlement-affected persons.	In the public related expropriation process, incomes from affected immovable assets are taken into consideration; yet the term " full replacement cost " is not used in the related Laws and depreciation is taken into consideration for homes/buildings.	Land acquisition was conducted through negotiated settlements. PAPs were paid in cash during the process of purchase through mutual agreement. Any additional land acquisition will be conducted at full replacement cost.

Key Social Issues	EBRD Policy	Turkish Laws - Related Gaps	Project mechanisms for handling these gaps
Eligibility	<p>Resettled legal right holders, users, etc. will be categorized.</p> <p>PR 5 Para 18 Displaced persons may be classified as persons: (i) who have formal legal rights to the land (including customary and traditional rights recognised under national laws); (ii) who do not have formal legal rights to land at the time of the census, but who have a claim to land that is recognised or recognisable under national laws or (iii) who have no recognisable legal right or claim to the land they occupy.</p>	<p>Only legal property owners are entitled to receive monetary fee (through expropriation of the land and other physical assets).</p> <p>Renters of houses and/or work places, tenant users of the land, legal/illegal users of forest areas and merchants without immovable property are not entitled to expropriation compensation</p> <p>Pursuant to recent amendments in Turkish laws, user rights on private and public properties are recognized, granted that they can be documented as per the legal legislation.</p>	<p>Project has developed an entitlement matrix that identifies compensation schemes according to right holders and users as defined by EBRD</p>
Grievances - A grievance mechanism will be established to address concerns about compensation and relocation	<p>PR 5 Paragraph 21</p> <p>Grievance Mechanism-</p> <p>A grievance mechanism will be set up and implemented from the beginning of the Project. Stakeholders will submit the problems they face regarding land acquisition, resettlement, etc. through the grievance mechanism and complaints will be resolved with an unbiased approach.</p>	<p>The Turkish legislation mentions no legal obligations to set up and implement a grievance mechanism.</p>	<p>The Project has a grievance mechanism for internal and external grievances established according to EBRD standards and international best practice.</p>

Key Social Issues	EBRD Policy	Turkish Laws - Related Gaps	Project mechanisms for handling these gaps
Livelihoods Assistance - If land acquisition for the Project causes loss of income or livelihood provide: Additional targeted livelihoods assistance and Transitional support to restore incomes/ livelihood	PR 5 Paragraph 22 Resettlement and/or Livelihood Restoration Framework- Resettlement and/or Livelihood Framework and/or Plan will be drafted on the basis of the Project.	Turkish laws have no articles mentioning drafting a RAP. The Turkish legislation states that only proper right owners will be granted Resettlement support. But there are no provisions about drafting a Resettlement Action Plan in the case of forced resettlement; or drafting a Livelihood Restoration Plan in the case of land acquisition.	The Project aims to restore/improve livelihoods. Hence, a Livelihood Restoration Plan was drafted in line with EBRD requirements.
Monitoring – Environmental and social performance of projects and the compliance with the environmental and social commitments as agreed in the legal documentation will be monitored.	PR 5 Paragraph 23-24 Monitoring- Resettlement and livelihood restoration processes will be monitored and assessed. This monitoring will include the engagement of key stakeholders such as Project affected communities. It is advised to have the monitoring assessment completion report prepared by a different institution.	Turkish laws have no legal basis about monitoring and assessing the implementation of Resettlement Action Plan or Livelihood Restoration Plan.	Internal and external monitoring of social issues is planned for all Project social package, including LRP, SEP and SIA. The Project has set monitoring indicators, and established a M&E mechanism for LRP.

Key Social Issues	EBRD Policy	Turkish Laws - Related Gaps	Project mechanisms for handling these gaps
RAP- In the case of project involving physical resettlement the project will develop a RAP in order to compensate affected communities.	<p>PR 5 Paragraph 26-27-28-29-30-31-32-33-34-35</p> <p>Physical displacement- In cases of physical resettlement for the Project, a Resettlement Action Plan (RAP) will be drafted and it will cover rights, effects and measures related to resettlement.</p> <p>While preparing the RAP; stakeholders will be consulted and informed about the process, the procedure and the mechanisms. The Project will offer resettled persons the option to choose between housing and fee in cash.</p>	<p>Turkish laws state that only proper right owners are entitled to resettlement support, as urban and rural settlement provided by the State. Complaints are not obligatory for offering resettlement support.</p> <p>Turkish laws also do not mention offering an option between housing and fee in cash, to stakeholders affected in the land acquisition process.</p>	<p>The Project currently does not include resettlement. Should physical resettlement be necessary in line with the Project requirements, The Project will carry out the legal obligations and, and prepare a RAP in line with EBRD PR 5.</p>
LRP - In the case of projects involving Economic Displacement only, the project will develop a LRP to compensate affected persons and/or communities and offer other assistance that meet the objectives of this Performance Standard. The LRP will establish the entitlements of affected persons and/or communities and will ensure that these are provided in a transparent,	<p>PR 5 Paragraph 36-37-38-39</p> <p>Economic displacement- In the event that the Project land acquisition affects livelihoods and causes economic resettlement, Livelihood Restoration Plan (LRP) will be drafted and implemented.</p>	<p>Turkish laws have no articles about livelihood restoration.</p>	<p>Project aims to restore livelihoods at pre-Project levels or improve livelihoods to the extent possible. The Project has a LRP in line with EBRD requirements.</p>

Key Social Issues	EBRD Policy	Turkish Laws - Related Gaps	Project mechanisms for handling these gaps
consistent, and equitable manner.			
Provide assistance that will off-set any loss of a community's commonly held resources.	<p>PR 5 Para 38 Provide assistance that will off-set any loss of a community's commonly held resources</p> <p>Paragraph 40- Losing public opportunities- In cases of land acquisition of public lands (pasture, grassland, etc.) for the Project, stakeholders who use these lands will be agreed with about alternatives. Provide assistance that will off-set any loss of a community's commonly held resources</p>	Turkish laws have no legal basis about a fee for or consulting with pasture users.	The Project conducts livelihood restoration works under the LRP, for losses of common assets and loss of access to common areas. The Project has acquired a pasture to set off adverse impacts of loss of access to pastures, and invests in pasture improvements.

Chapter 3 Socio-economic Background

3.1. Introduction

The purpose of this chapter is to establish the socio-economic baseline of PAPs. It is essential to understand the PAPs' socioeconomic status, demographic composition, and livelihood sources in order to identify Project's potential land acquisition impacts on their livelihoods. Land acquisition for the Project preceded LRP studies; hence all private land was already acquired by the Project prior to the LRP studies. LRP focused on land loss for both public parcels (forestry, Treasury, Municipality) and private parcels; as the aim is to identify users/owners/beneficiaries of assets and to ensure that eligibility criteria reflects apt measures for rightful compensation according to EBRD PR 5. This chapter presents the results of the socio-economic surveys, secondary analysis, and qualitative consultations to define the socioeconomic background of the PAPs.

3.2. Methodology

Methodology for the socio-economic baseline is based on:

- Review of secondary data
- Socio-economic household surveys
- Secondary data collection from public institutions
- Consultations with PAPs
- Focus group meetings
- In-depth interviews with elected village leaders (Mukhtars)

Field work for LRP took place between November 8 and 11, 2016. An extensive socioeconomic baseline data collection and SIA process was conducted during 2015-2016 which also was used to devise the baseline inputs for the LRP. Field work comprised of quantitative methods and qualitative techniques to reflect baseline conditions. A second field work took place in July 2017 in order to understand the impacts on PAPs who are temporary residents. LRP surveys were conducted with PAPs who have lost their land to the Project. The goal of the field work was to:

- Understand demographic structure of PAPs (age, family size, education, health, employment status)
- Analyze livelihood sources, incomes and expenses
- Define land asset ownership
- Assess the Project land acquisition's impact on all immovables
- Reflect the opinions and perceptions of PAPs about the Project's impacts
- Collect any grievances and evaluate if there is a working grievance mechanism
- Learn the PAPs' preferences for livelihood restoration
- Identify the vulnerable groups and

The field steps were as follows:

- Obtaining land acquisition data with owners (public/private) from Acacia Mining
- Identification of owner/users/beneficiaries through in-depth interview with Mukhtars, key informants
- Surveys with PAPs
- Focus group meetings with local employees
- Consultations with PAPs

Acacia Mining Operations has two neighborhoods (3 settlements) affected by GCP's **private** land acquisition activities. **Yılanlı settlement** in Hanonu Central (Merkez) Neighborhood is affected from the land acquisition for the Project's the Tailings Storage Facility (TSF). Vakıfgeymene Neighborhood on the other hand is impacted from land acquisition for the open pit site (**Sepetçioğlu and Dereköy**). Household surveys were conducted in these settlement with owners/users of the private parcels.

Gökçeada, Küreçayı and Bağdere were affected by the Project's forestry and treasury land acquisition. Mukhtars of affected settlements were consulted in order to determine the users of acquired public land. The muktar and key informant interviews did not reveal any individual users of public land, and emphasized that the use of common land was done by all PAPs who engage in livestock production. Hence, qualitative discussions were held to understand impact and formulate mitigations for loss of land. Emphasis was given to understanding existing vulnerable groups and groups that may risk falling into vulnerability as a result of Project's land acquisition. Consultations with women and elderly were held to reflect their concerns/demands and any adverse impact the Project may pose on them.

There were 117¹⁸ PAPs¹⁹ impacted from land acquisition of 84²⁰ parcels according to parcel database obtained in November 2016. The socio-economic surveys were conducted with permanent residents PAPs who are owners/users/beneficiaries of private land. Hence, 20 socioeconomic surveys were conducted (14 face-to-face and 6 phone interviews) to formulate the baseline. The surveys were able to reach *all permanent resident* PAPs²¹. None of the PAPs from Sepetcioglu were residing in the settlement during the time of the surveys since all Sepetcioglu settlement PAPs are temporary²² residents. Consultation with Sepetcioglu PAPs was held in July 2017 to understand their livelihood and land use pattern. Quantitative surveys and] in-depth interviews were conducted during field studies. In-depth interviews with five mukhtars, 3 Forestry cooperatives, 3 public institutions, women employees, elderly were held

¹⁸ The reason for the high number of PAPs in comparison with low parcel number is due to situation of multiple inheritance.

¹⁹ The ratio of non-residence is quite high; in Vakıfgeymene non-resident owners comprise 80 percent of parcel owners, whereas in Yılanlı almost half of the households are non-resident. Non-resident Households are those that do not have any connection with land.

²⁰ The number of parcels impacted by land acquisition was 91 as of June 2017. However, when the field studies were conducted there were 84 parcels impacted by land acquisition.

²¹ Most of the temporary resident or non residing PAPs are based in Istanbul and Ankara. Consultations with residents who live outside the region were conducted in Istanbul and during the workshops.

²² Sepetcioglu settlement is used only seasonally, from April (May)- September (October). Most of these PAPs live in Istanbul.

to discuss land acquisition impacts. The parcel database was also updated according to residence of PAPs²³.

3.3. Socio-economic status

3.3.1. Demographic status

As of 2016, the population of Hanönü district of Kastamonu province is 3,865 persons. Looking at the age distribution in Hanönü district, it is seen that the district shows an aging trend and that population growth is slowing down. This situation across the province also applies to Hanönü district. The migration trend of Hanönü district is outward. The district's population growth rate was -1.3% in 2010-2015 period. This outward migration trend has resulted in most of the PAPs residing outside the district.

Socio-economic surveys with PAPs provided information about the household structure. Surveys showed that the median household size is 3²⁴ and the age average is 41. According to TURKSTAT data, the mean age across Turkey for 2015 is 31; the high age average goes to show that the population shows an aging trend in Project Affected Settlements (PAS). This also applies to Kastamonu province. **Kastamonu province is the second province in Turkey with the highest elderly population.** Age average in the province is 37.6. Most (86%) of the interviewed households, has a family member over the age of 60. Elderly PAPs live in a traditional family setting, with their children. There has been a decrease in PASs, especially in the rural region. Thorough meetings with mukhtars revealed that 193 households have left PASs and moved to Istanbul or Ankara. Mukhtars stated that the primary causes of migration are economic causes; such as financial difficulties, lack of employment opportunities and lack of land.

Table3.1. Demographic statistics

Subject	Values
Size of household (median)	3
Age Average	41
Women/men ratio (percent)	53%-47%

Source: SRM Socio-economic research, 2016.

3.3.2. Education

Survey results showed that 8% of the surveyed households (HH) is illiterate. All illiterate population is over the age of 65. Majority of the PAPs are elementary school graduates (34%); number of qualified higher-educated PAPs is considerably low (5%). Low level of education is important in terms of employment opportunities of the project. The contribution that the Project aims to make to sustainable local employment, especially through training the young population is of great importance.

Table3.2. Education Statistics

Education Status	Number	of	Rate
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²³ See Annex 5 Table 2.

²⁴ Half of the responding Households comprised of 2-3 people per household. 4 households have a size of 4 people and 3 households are extended families with 6 or more residents.

persons		
Illiterate	5	8%
Literate	6	10%
Elementary school dropout	3	5%
Elementary school graduate	20	34%
Middle school graduate	3	5%
High school graduate	2	3%
University/Vocational school graduate	3	5%
Not student (age under 4)	4	7%
Student	13	22%
Total	59	100%

Source: SRM Socio-economic research, 2016

Most of the students in PAPs benefit from mobile education. Children from all households, except those in Merkez district, go to school with mobile education, one student attends a boarding high school. 4 out of 13 students continue their education in university, demonstrating that the younger generation values education.

Table3.3. Studentship status statistics.

School Status of the Students	Number of Students	Mobile Education	Boarding	Normal
Primary School	3	2	0	1
Middle School	4	3	0	1
High School	2	1	1	0
University/Vocational school	4	NA	NA	NA
Total	13	6	1	2

Source: SRM Socio-economic research, 2016

3.3.3. Employment status

PAPs participating the survey between the ages 18-65 (active working age group) get their income from two main working fields: farming and labor. Women identify themselves as housewives. Looking at the PAPs' working status, it is seen that the majority has declared a non-active working status; such as housewife, retired, student. The working PAPs do not have any artisans or civil workers. Though women partake in both livestock and agricultural activities, only one woman identifies herself as farmer. Women's labor force participation is an important issue; the Project will work on this subject within the scope of livelihood restoration activities and make visible women's contribution to the economy.

Table3.4. Working status statistics.

	Number	%
Farmer	6	18.18%
Worker	6	18.18%
Housewife	13	39.39%
Retired	4	12.12%
Student	4	12.12%
Total	33	100.00%

Source: SRM Socio-economic research, 2016

3.3.4. Health and social security

85% of PAPs stated that they had no health issues. 7 PAPs reported that they had a chronic disease, while 2 fell under the category 'elderly in need of nursing'. Most of those with chronic diseases are elderly. There is one person who is young and cannot work due to his chronic disease. 93% of PAPs have social security. Only 4 persons among PAPs do not have social security.

Table3.5. Social security statistics

Social Security Status	Number of persons	Rate
SSI	45	76%
GHI	10	17%
No social security	4	7%

Source: SRM Socio-economic research, 2016

3.4. Agriculture and Livestock

Agriculture and livestock are important livelihoods in PASs. According to the surveys conducted in PASs, most (86%) of the households engage in agriculture²⁵. Most of the lands are suitable for dry agriculture. 2 households declared that they conduct irrigated agriculture activities. 75% of the households stated that they cultivate their lands themselves, 2 households stated that their lands are empty, and another 2 said that they only use their lands for grazing. The average cultivated land size per household is 16 decare. Some households have vineyards, gardens and fruit orchards; since climate conditions of the region are convenient. A third of interviewed lands stated that they also use lands that do not belong to them. While many of these lands are used on the basis of renting, 2 households use lands that belong to their relatives/neighbors. These households cultivate additionally 3 decare per household; while households that rent lands use 45 decare of additional land.

Table3.6. Type and size of the cultivated lands.

Land Type	Number of Households	Size (decare)	Decare/Household
Vineyards	3	7	2
Gardens	9	17	2
Dry fields	11	155	14
Irrigated fields	2	24	12
Fields total	11	179	16
Fruit orchards	4	10	3
Woods	1	1	1
Other	1	1	1

Source: SRM Socio-economic research, 2016

According to the survey results, wheat and barley are the most cultivated agricultural products. Garlic, which is a local product, is also cultivated by households. Meetings with mukhtars showed that garlic is the biggest source of income among agricultural products, in Vakıfgeymene, Merkez and Küreçay. Mukhtars stated that second to garlic are wheat and beet in terms of agricultural income.

²⁵ Both of the households not engaging in agricultural activities are comprised of elderly persons. Households with labor force conduct agricultural and livestock activities.

Table3.7. The most cultivated agricultural products.

The most cultivated agricultural product	Product	Number of households
1	Wheat	9
2	Barley	6
3	Garlic	5
4	Walnut	4
5	Common Vetch	3

Source: SRM Socio-economic research, 2016

70% of the households have fruit trees and/or other income-generating trees. Apple trees are the most common fruit trees and walnut trees are the most common income-generating trees. A household engaged in fruit gardening has 150 trees. Households that grow fruits and walnuts have 39 trees on average.

Table3.8. Tree types and numbers of Project affected persons

Tree	Number
Pear	49
Quince	37
Walnut	79
Apple	135
Plum	23
Cherry	44
Peach	1
Total	368

Source: SRM Socio-economic research, 2016

PAPs use tap water, rivers, streams and irrigation systems for agricultural activities. Households which use tap water stated that the water is insufficient for irrigation; while households which use the river stated that they have enough water resources. Half the households which conduct agricultural activities stated that the irrigation system is insufficient.

Project's potential negative impact on water resources can also affect agricultural water use of households. The Project technical crew will take the necessary measures to prevent water resources from generating an extra burden because of Project activities, especially in regions where irrigation is insufficient. For this, water resources were mapped. These resources will be monitored at all times, samples will be analyzed and followed throughout the Hydrogeology impact monitoring and assessment process stated in the Environmental and Social Impact Analysis Report. Additionally, developing water resources and irrigation infrastructures, switching to irrigated agriculture etc. will be supported. But these supports will be structured and programmed as a part of a community development program.

3.4.1. Livestock

71% of the **surveyed** PAPs engage in livestock activities. Bovine livestock is more common among households that conduct livestock activities. Each household has 9 cattle on average.

livestock activities are conducted in PASs. Livestock is the main agricultural activity in Merkez neighborhood and Küreçayı. The 3 households that conduct ovine livestock activities have 67 animals on average. Most of the households have poultry for their own needs. Only three households reported selling livestock by-products (milk, yoghurt, cheese), PAPs use the by-products for their own needs.

Table3.9. Livestock data.

	Number of Households	Number of Animals	Average animal/household
Bovine Livestock	8	72	9
Ovine Livestock	3	200	67
Poultry Livestock	9	75	8

Source: SRM Socio-economic research, 2016

Pastures are of great importance for cattle producers. During meetings with mukhtars, especially the mukhtar of Vakıfgeymene emphasized importance of pastures and stated that the pasture lands the Project acquired under land acquisition activities, could be compensated by registering additional land to village legal entity. **Acacia Mining Operations purchased additional land to resolve the pasture issue and is planning a route for access to the new land.** There were also restrictions in the roaming of livestock in Yılanlı neighborhood due to the Project's land acquisition. Households must have access to pastures for livestock activities to carry on. Acacia Mining Operations works for ensuring the sustainability of livestock activities, by meeting with PAPs and mukhtars.

3.5. Household Incomes and Expenses

3.5.1. Household Livelihoods

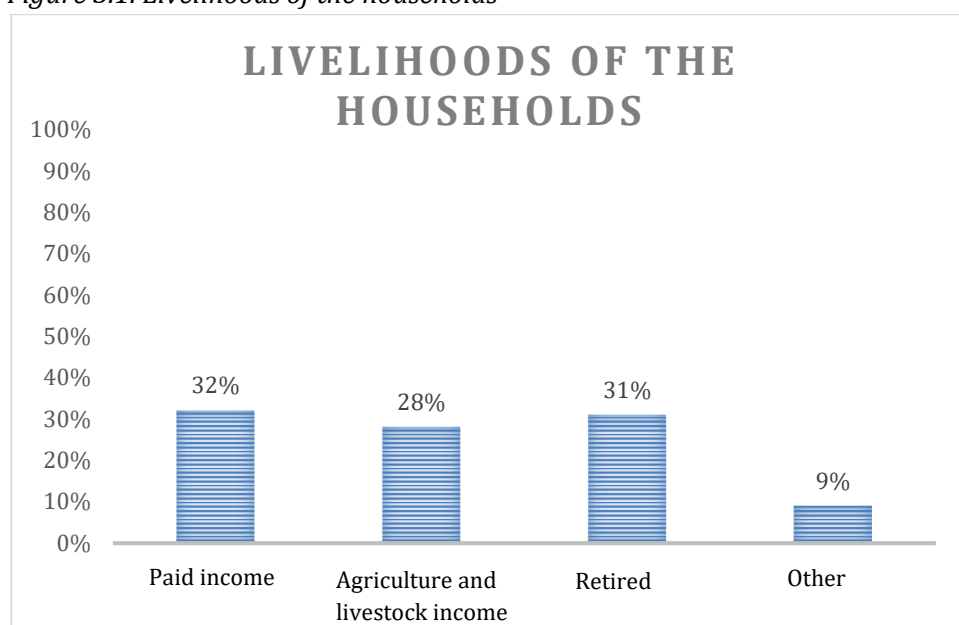
One of the most significant results of the surveys is that households have multiple livelihoods. Regular retired payments and/or regular worker's payments compliment livestock and agricultural incomes. Average annual income of households is TRY 28,737, which is in line with an equivalent household income of **TRY 11,495**²⁶. According to "Study on Income and Living Conditions" by TURKSTAT in 2015; Turkey's annual average is TRY 16,515, while Kastamonu's average is between **TRY 11,969 - 15,301**²⁷. This goes to show that the household income average is close to the province average, and below the national average. Livestock activities generate more income than plant production. Studying the household income structure, it is seen that agricultural income (plant production + livestock) comprises only 35% of income in households that conduct agricultural activities. When livelihoods are distributed between households, it is seen that there is a quite balanced distribution between paid incomes, retirement pensions and agriculture-livestock incomes. **One elderly household whose only**

²⁶ The method TURKSTAT stated was used for calculating the equivalent household income. Average household size is 4.2. Age average of the other individuals in the household is above 14. Accordingly, reference persons in the household are accounted as "1", other individuals are accounted as "0.5" and the equivalent household number is calculated (1 + 0.5 + 0.5 + 0.5 = 2.5). Then the obtained figure is divided by the annual household income (27,737 / 2.5 = TRY 11,495). http://www.tuik.gov.tr/MicroVeri/GYKA_Panel_2011/turkce/metaveri/tanim/essdeggerlik-oelcceggi/index.html

²⁷ <http://www.tuik.gov.tr/PreHaberBultenleri.do?id=21868>

income is poverty benefit was identified during surveys, this household will be monitored within the scope of vulnerable groups.

Figure 3.1. Livelihoods of the households



Source: SRM Socio-economic research, 2016

Seasonal works between PAPs is insignificantly low. 4 out of 6 PAPs interviewed on the phone stated that they were retired.

Table3.10. Income Structure of Households

	Number of households	Total Annual Income (TRY)	Annual Average (TRY)	Monthly Average (TRY)
Paid Incomes	9	253,880	28,209	2,351
Paid work	6	106,440	17,740	1,478
Artisan/Craftsman/Trade	2	21,600	10,800	900
Retired	9	123,840	13,760	1,147
Seasonal/temporary workers	1	2,000	2,000	167
Agricultural Income	6	16,000	2,667	222
Field products	6	12,000	2,000	167
Fruit growing, viticulture, etc.	2	4,000	2,000	167
Livestock	8	96,840	12,105	1,009
Animal selling	8	94,500	11,813	984
Animal products	3	2,340	780	65
Other Incomes	4	35,600	8,900	742
Rental income	3	8,000	2,667	222

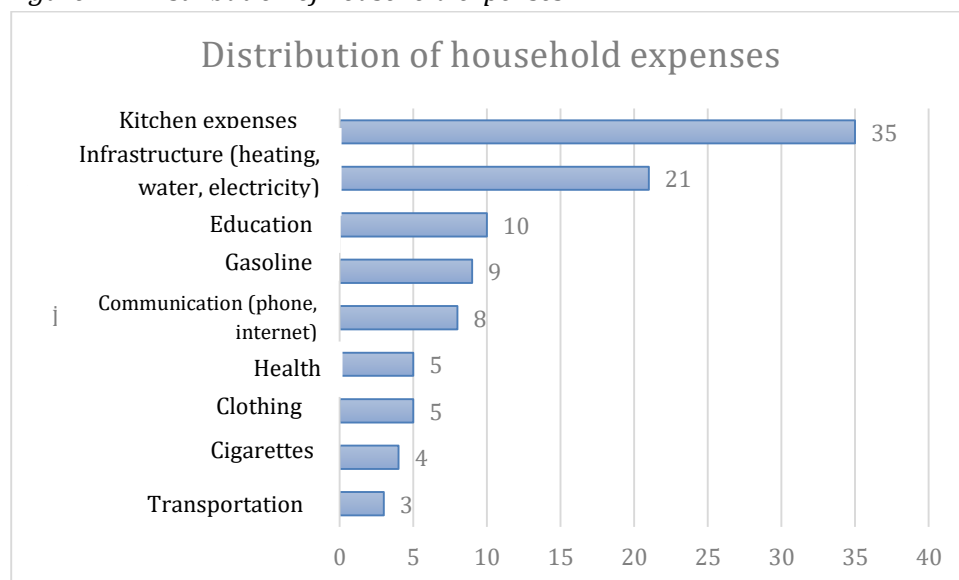
Dole (2 widower pensions, 2 age pensions)	4	12,000	3,000	250
Other	1	15,600	15,600	1,300
Grand Total	14	402,320	28,737	2,395

Source: SRM Socio-economic research, 2016

3.5.2. Household Expenses

Average annual household expense is TRY 20,819 (Table 3.14). Studying household expenses, it is seen that kitchen expenses have the most important place. 35% of all household expenses spent for food. Considering the monthly income of the households,²⁸this is a striking rate. Fundamental infrastructure needs of the household, such as electricity, water and heating, compose a fifth of the expenses. In households with school children, education expenses also have a significant share. All households stated their health expenses.

Figure 3.2. Distribution of household expenses.



Source: SRM Socio-economic research, 2016

Livestock and agricultural production expenses are among agricultural expenses. Forage has a significant cost among livestock expenses. Though households produce vetch and corn to support livestock, pasture grazing does not meet the need for animal feed and support from the outside becomes necessary. Households have an average annual pasture expense of TRY 4,629 and a veterinary expense of TRY 1,625. Pesticides and fertilizers have a significant share in agricultural expenses in plant production. Households' average annual agricultural expense is TRY 1,614. During surveys, one household stated that it is in debt.

Table 3.11. Household expense data.

Expense Types	Number of households	Total Annual Expense (TRY)	Annual Average (TRY)	Monthly Average (TRY)
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²⁸ PAPs stated that they produce some animal and plant products for themselves, that they do not have any monetary revenue from them. 'In kinds' is a term used to describe households using their own productions.

Annual Household Expenses	14	291,460	20,819	1,735
<i>Wood</i>	6	4,900	817	68
<i>Coal</i>	9	13,600	1,511	126
<i>Electricity</i>	14	20,100	1,436	120
<i>Water</i>	8	3,500	438	36
<i>Bottled gas</i>	14	12,640	903	75
<i>Land line</i>	6	1,860	310	26
<i>Mobile phone</i>	11	15,360	1,396	116
<i>Internet</i>	5	2,760	552	46
<i>Rent (House)</i>	1	4,200	4,200	350
<i>Kitchen (Food)</i>	14	89,800	6,414	535
<i>Clothing</i>	12	13,800	1,150	96
<i>Education</i>	4	25,000	6,250	521
<i>Health</i>	10	14,000	1,400	117
<i>Transportation</i>	6	8,200	1,367	114
<i>Cigarettes</i>	6	9,840	1,640	137
<i>Fuel (Passenger vehicles, etc.)</i>	5	24,700	4,940	412
<i>Fuel (trucks, diesel fuel, etc.)</i>	10	27,200	2,720	227
Livestock Expenses	8	46,760	5,845	487
<i>Livestock forage</i>	7	32,400	4,629	386
<i>Animal purchase</i>	1	1,000	1,000	83
<i>Veterinary services</i>	8	13,000	1,625	135
<i>Poultry</i>	1	360	360	30
Agricultural Expenses	11	17,750	1,614	134
<i>Seed-seedling</i>	9	6,600	733	61
<i>Agricultural pesticide</i>	7	7,650	1,093	91
<i>Scientific fertilizer</i>	3	3,250	1,083	90
<i>Agricultural activities irrigation</i>	1	250	250	21
Debt	1	2,000	2,000	167
<i>Debt</i>	1	2,000	2,000	167
Grand Total	14	357,970	25,569	2,131

Source: SRM Socio-economic research, 2016

3.5.3. Livelihood Conditions of the Households

The survey had questions for reflecting the households' perception of their own livelihood conditions. These questions display the future expectations of the households and aim to show their current economic status. None of the PAPs declared that their livelihood conditions were comfortable/easy. While most of the PAPs see themselves as mid-level, 4 PAPs stated that they have trouble making a living. (Table 3.15).

Table 3.12. Answers of the households to the question 'How well does your livelihood meet your household's fundamental needs?'

Livelihood Status	Number	of	%
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Households		
Easily	0	0%
Middle	9	64%
Hardly	4	29%
I don't know	1	7%
Total	14	100%

Source: SRM Socio-economic research, 2016

Comparing their livelihood conditions to that of the last year, 6 PAPs stated "worse", while 4 stated "better". Most of the households assume that their economic conditions will be worse in 5 years.

Table3.13. Households' livelihood conditions last year

Livelihood condition compared to last year	Number of Households	%
Same	3	21%
Worse	6	43%
Better	4	29%
I don't know	1	7%
Total	14	100%

Source: SRM Socio-economic research, 2016

3.6. Household Assets

3.6.1. Project Affected Land Asset

Both dry and irrigated agriculture lands were affected from the Project's land acquisition. The Project's average land acquisition per household is 8 decares. About 5.1 decares of dry agriculture land and about 9.1 decares of irrigated agriculture land was acquired. 2 of the Project affected households lost only irrigated agriculture lands, 3 lost both irrigated and dry agriculture lands. 8 out of 14 households are registered to less than 4 decares of land; 4 households are registered to lands larger than 10 decares.

Table3.14. Type of being affected from the Project's land acquisition.

Type of affected land	Number of Households	%
Dry agriculture only	9	64.29%
Irrigated agriculture only	2	14.29%
Both dry and irrigated agriculture	3	21.43%
Total	14	100%

Source: SRM Socio-economic research, 2016

Survey results show that 2 households lost more than 20 decare of land. The land purchased from the least affected households were 1 decare, while that purchased from the most affected was 24 decare. A household in Vakıfgeymene Dereköy lost most of their irrigated land. While another in Vakıfgeymene Sepetçioğlu lost the driest land.

Table3.15. Average land acquisition per household.

Affected Land	Number of Households	Total size (decare)	Average
Dry	12	60	5
Irrigated	5	45.5	9.1

Source: SRM Socio-economic research, 2016

Products the most cultivated in project affected lands are wheat and barley. 4 households cultivate garlic, which is an income-generating product. **According to the survey results**, PAPs' trees on their lands were also affected form land acquisition. 10 households stated that there were trees on their lands. A household's vineyard of 150 roots was also purchased through land acquisition.

Table 3.16. The most cultivated product

The most cultivated agricultural product	Product	Number of households
1	Wheat	14
2	Barley	9
3	Garlic	4
4	Grass	3
5	Sugar beet	2

Source: SRM Socio-economic research, 2016

Survey results show that the walnut tree is the most prominent among the trees acquired by the Project. Fruit trees other than walnut are used by the households—Average tree loss per household is 14.8.

Table3.17. Trees on purchased lands

Tree	Number
Pear	19
Quince	8
Walnut	60
Nettle tree	6
Mulberry	1
Apple	28
Fir	1
Cherry	14
Lentisk	5
Peach	1
Sour Cherry	5
Total	148

Source: SRM Socio-economic research, 2016

Households were also asked about their annual income from Project affected lands. 11 PAPs declared that they have regular income over lost lands, while 3 PAPs stated that they do not use the land. PAPs' incomes from the lands are directly proportionate with the size of the land. Except for the 2 households with over 10 decares of affected land, the annual income from Project affected land is TRY 1,492. For households that lost larger lands, the declared annual land-based income is TRY 10,600.

Information for agricultural lands that PAPs use is given under the title 'agriculture'. PAPs own other lands than those purchased by the Project. The project's land acquisition affected mostly less than 40% of land resources. Two households stated that they have little land other than those purchased by the Project.

Table3.18. Project affected land / Total land ratio.

Project affected land / Total land	Number of affected households
Less than 20%	5
20-40%	5
40-60%	2
60-80%	0
Over 80%	2

Source: SRM Socio-economic research, 2016

The survey also asked the PAPs if they own any property other than the house they reside in. The results showed that two thirds of the households owned other immovables like houses or shops, apart from the house they reside in. Hanönü is the PAPs' second choice, after village houses.

Table3.19. Other properties that households own.

Immovable	Number of households	%	Hanönü	Place Kastamonu	İstanbul
House	5	36%	4	0	1
Shop	1	7%	1	0	0
Both house and shop	3	21%	5	1	0
None	5	36%			
Total	14	100%			

Source: SRM Socio-economic research, 2016

3.6.2. Property of vehicles and agricultural machinery

Households owning vehicles and agricultural machinery says a lot about their income levels. 90% of PAPs conducting agricultural activities own tractors. 4 households own automobiles. 1 household owns a minibus to use for business activities and 1 household owns a truck/lorry. These are households with relatively high income levels.

Table3.20. Vehicle ownership of the households

Vehicles and agriculture machinery	Number of households	Number of vehicles
Automobile	4	4
Minibus	1	1
Truck	1	1
Lorry	1	1
Tractor	10	11

Source: SRM Socio-economic research, 2016

3.7. How land compensations were used

The surveys asked PAPs how they used the money they received from selling their lands through mutual agreement. The amount households receive vary on how many owners own the parcel and the size of the parcel. The households reported that the average value per household is TRY 73,786 (Table 3.24). Households that received income below TRY 10,000 used the money for household expenses and paying debts (Table 3.25). Households that received income between TRY 10,000-50,000 used the money to replace old house items and to invest in their living conditions. As the income from selling lands increased, households had opportunity to make investments. Some of the households that received high amounts used the money to purchase houses in Hanönü or Kastamonu, or to purchase a land to later build a house on. None of the PAPs used the income for agricultural lands or to increase their livestock capacity.

Table3.21. Average land value per household.

	Number of households	Total amount (TRY)	Average value per household (TRY)
Land value per household	14	1,033,000	73,786

Source: SRM Socio-economic research, 2016

Table3.22. How land values were used.

Land value per household	Number of households	Type of use
Below TRY 10,000	2	General household expenses, paying debts
TRY 10,000-50,000	5	House items, renovations, giving the money to children, paying credits, household expenses
TRY 51,000-100,000	4	Houses in the village/town, wedding expenses, general household expenses, paying credits
Above TRY 100,000	3	Houses in the town/Merkez, paying credits/debts, general expenses

Source: SRM Socio-economic research, 2016

On-the-phone surveys showed that PAPs residing outside the town either deposited the money in banks, given it to their children or used it for renovations in their houses in Hanönü.

3.8. Stakeholder Engagement, Project Information and the Grievance Mechanism

PAPs who participated in the survey were asked how they were informed of the Project. The main source of information for the PAPs (64%) is visits from and meetings with company representatives. The second source of information is the mukhtar, followed by the Municipality. When asked what they would like more information about, 6 households stated that they had no further questions. PAPs who wanted to be informed were interested in: the Project's environmental impact, whether or not the WSF land could be used for livestock activities again, whether or not an irrigation system would be built for the lands, the Project's contribution to the district and how local employment would carry on in the operational phase. Since the two settlements affected by the project; Yılanlı locality Merkez neighborhood and Vakıfgeymene, Sepetçioğlu and Dereköy were affected from different components of the Project, their questions and complaints may be different too. **Project's regular public information meetings will continue in a structure where PAPs can ask questions about their own settlement and get answers.**

PAPs should address their complaints about the Project to the company and/or the mukhtar. 2 households stated that they may address their complaints to the district governorship. **PAPs, especially those affected by land acquisition, should be visited and informed about the Project grievance mechanism. Since there are very few land-acquisition-affected households permanently residing in Hanönü, these households can be contacted face to face.** It was seen that awareness was low for ***grievance*** hotlines, for complaints and contact. Numbers for the **grievance mechanism** should be shared with PAPs, and the workings of the complaint mechanism should be explained. **Acacia Mining Operations has a grievance mechanism related to this.** Acacia Mining Operations Public Relations Department reports that face to face meetings and informing have been continuing since the beginning of the company's operations, that all villages have information boards regarding their complaints, that all mukhtars know the contact numbers and that all villages are being visited.

3.9. PAP's Perception of the Project

The Project's positive and possible negative impacts were asked about in the survey, to measure how PAPs perceive the Project. PAPs think that the Project's biggest positive impact is the contribution it makes to the district's development. Other positive impacts are the Project's contributions to the village, the neighborhood and the economy. 4 PAPs stated that they do not expect any benefit, while 3 households said that they expect only harm.

Table3.23. Benefits of the Project.

Benefits of the Project	Number of households	%
Contribution to national economy	1	7%
Contribution to the district's development	5	36%
Contribution to the development of the village/neighbourhood	1	7%
No benefits/advantages	4	29%
Only harm	3	21%
Total	14	100%

Source: SRM Socio-economic research, 2016

PAPs were allowed to give multiple answers to this question, no options were read, the answers they gave were marked. PAPs state that the Project's negative impacts are those felt in their lives; such as dust, noise, losses in livestock activities and in crops, and lower livelihoods. This report's objective is to eliminate potential damages to PAPs' livelihoods and to restore their livelihoods. For this reason, PAPs were also asked about what measures to take to mitigate the impacts.

Table3.24. Negative impacts of the Project

The most negative impacts of the Project	Number of households	%
Dust/more dust	6	19%
Loss in livestock activities	5	16%
Noise/more noise	5	16%
Roads were damaged	4	13%
Crops/trees were damaged	4	13%
Loss in livelihoods	2	6%
More traffic risks	2	6%
Lands were damaged	1	3%
Lands became unsuitable for construction	1	3%
Livelihoods were affected	1	3%
The forest was damaged	1	3%

Source: SRM Socio-economic research, 2016

Top priority of PAPs in measures was income-generating agricultural and livestock activities. The measures PAPs recommended can be summarized as infrastructure supports, income-generating works and contribution to labor force. They stated that income-generating works could include activities to develop agriculture and livestock. PAPs proposed switching to irrigated agriculture, building irrigation systems, initiating livestock activities, building troughs for animals. There were requests regarding taking infrastructural measures so households in Sepetçioğlu near the mine do not get affected from the explosions, building a bridge for passage to Yılanlı locality, constructing roads, building a mosque, etc. Ensuring local employment to contribute to labor force and organizing vocational courses were also proposed. The measures that PAPs proposed will be a part of the restoration process.

Table3.25. Measures to mitigate the negative impacts.

Recommendations to mitigate the negative impacts	Number of households	%
Income-generating (agriculture-livestock) works	5	26%
Local employment	4	21%
Road renovation/construction	3	16%
Infrastructure	2	11%
Forestry	1	5%
Vocational courses	1	5%
Drinking water	1	5%
School construction/support	1	5%
Social assistance (mosques, etc.)	1	5%

Source: SRM Socio-economic research, 2016

PAPs were also asked which topics would benefit improvement of their livelihoods. The majority of the PAPs wanted to be informed about livestock. Bovine livestock, ovine livestock, poultry livestock, beekeeping and livestock facilities were touched upon, within the context of livestock. Plant production topics on the other hand were irrigated agriculture, greenhouse activities, field plants data, fruit growing and gardening.

Table 3.26. Main topics to develop livelihoods.

Topic	Number of Households	%
Bovine livestock	7	33.33%
Ovine Livestock	5	23.81%
Irrigated agriculture	2	9.52%
Beekeeping	1	4.76%
Livestock facilities	1	4.76%
Greenhouse Activities	1	4.76%
Field plants data	1	4.76%
Fruit growing/Gardening	1	4.76%
Poultry	1	4.76%
Vocational courses	1	4.76%

Source: SRM Socio-economic research, 2016

Vocation preferences of women and young PAPs were also asked. PAPs stated titles such as embroideries, home economics, livestock, etc. In respect to the PAPs' requests, courses for developing PAPs' livelihoods with those of the stakeholders and raising social skills will be planned in line with the needs.

Additionally, Acacia Mining Operations will plan courses to contribute to local development and PAPs' self-development, in line with the needs. These will be primarily vocational courses. Acacia Mining Operations local employment directive elaborates this topic.

Acacia Mining Operations organized various training programs in Hanönü district for raising qualified labor force and improving knowledge and skills. These courses are: Construction Equipment (Forklift) Operating; Steel Framing in Dangerous and Highly Dangerous Jobs; Reinforced Concrete, Iron, Molding and Roof Work Expertise in Dangerous and Highly Dangerous Jobs; and Solid Fuel Radiator Blasting courses.

Apart from these, 60 persons from Hanönü participated in the **entrepreneurship course** to receive certificates at the Public Education Center. In December 2016, within the scope of "One With My Profession Project" (Mesleğimle Varım Projesi), 23 persons (6 women and 17 men) participated in the unarmed **security guarding course** to get certificates.

Vocational and social courses are planned for the later stages of the project. PAPs will be prioritized in education activities and courses.

Supporting more training programs is planned, in line with the Project's needs and PAPs' choices.

Table3.27. Courses for women and the young

Courses for women and the young	Number of households	%
Clothing, embroideries	6	33.33%
Vocational course	5	27.78%
Home economics	2	11.11%
Livestock	2	11.11%
Computers	1	5.56%
Agriculture	1	5.56%
Beekeeping	1	5.56%

Source: SRM Socio-economic research, 2016

3.10. Vulnerable groups

3.10.1.1. *The elderly*

The elderly composes an important part of project affected vulnerable groups. 12 persons among PAPs are over the age of 65. These persons reside in 8 different households. Survey results showed that in Hanönü district, which shows an aging trend, two of the Project affected households comprises of **only** elderly persons. In other households, elderly persons live with their children. In one of the elderly-only households reside a husband and wife, their age average 86. Neighbors in the neighborhood provide them their needs. The other household's age average is 74 and their child is outside the province. But the resident has retirement pension and conducts agricultural activities. 2 PAPs residing with their child get old age assistance. **The Project crew will visit elderly persons' households and inform them on the Project, especially in monitoring and assessment procedures, and learn their needs. Elderlies' households will not be left stuck in difficult situations, the Project will support them through livelihood restoration. PAPs with a very low socio-economic status will be provided with food and heating assistance. Guidance assistance will be offered to them so that they can benefit from public services and social assistances.**

3.10.1.2. *The Disabled*

There are no physically or mentally disabled persons among the PAPs. But there are 7 PAPs with low physical capacity, due to chronic diseases. While most of these PAPs suffer from diseases due to old age, one household has a 21-year-old chronic patient, who also happens to be living at a household that lost a significant deal of land. The Project social team will follow this household closely during monitoring process, visit it frequently and prevent them from getting in a worse situation because of the Project.

3.10.1.3. *Women*

Women comprise 53% of the population in the Project field. Almost all of the household has an elderly woman residing in it. One household that comprised of only women was detected. Women's employment and engagement in the economy are among the Project's main working subjects and the Project fully supports the newly founded women's cooperative in Hanönü. Works are also being conducted to equip women with professional skills. The Project plans to visit the women-only household and inform the residents about the Project, face to face.

3.10.1.4. *The Landless*

2 households transferred all of their lands within the Project area to Acacia Mining Operations, in exchange for its value. One of these households purchased a house in Kastamonu with the value and also has artisan's income. The said PAP received one of the highest land values, because of the size of the affected land. A total of about TRY 255,000 was paid for 17 decares of land. Upon interviews, he stated that he has no intentions of conducting agricultural or livestock activities again.

The other household was a shareholder for 9 parcels of affected land. The average shareholder number per parcel is 6. The user of the affected land also happens to be the PAP who is a shareholder. The other shareholders reside outside the district. Total size of the parcels is 17 decares and the PAP was paid about TRY 250,000 of land value. His household size is 3. His only income apart from agriculture is his retirement pension. Additionally, he conducts agricultural

activities to provide for his family in a 3 decares of land that he owns. During interviews, they stated that they do not yet consider investing the land value they received in profitable agricultural and livestock activities.

The Project will inform the households about community development programs planned to be carried out for restoration of livelihoods and households benefiting from these programs will be a priority.

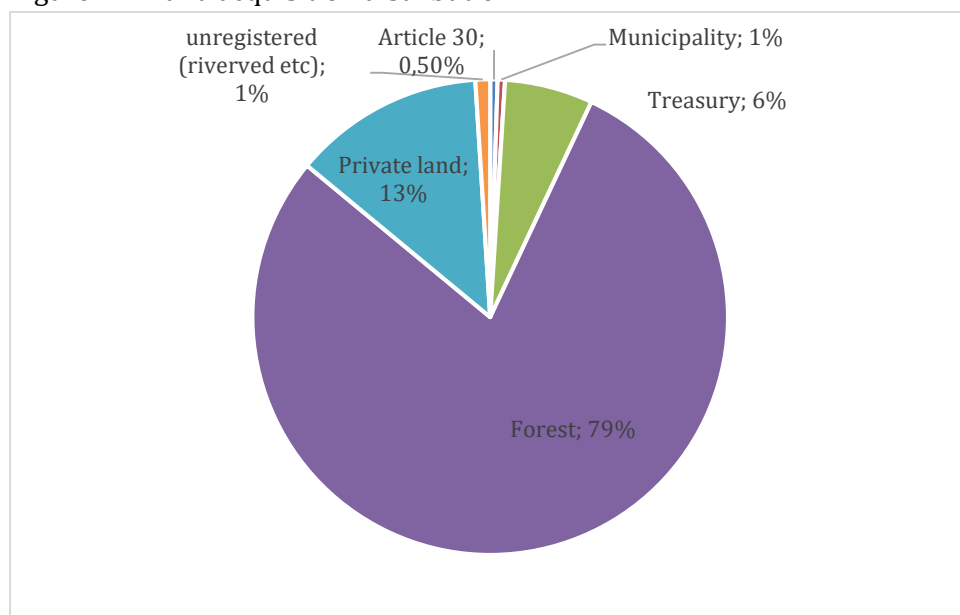
Chapter 4 Project's Land Acquisition and Impacts

GCP land acquisition activities currently cover forestry lands, pasture lands, institutional lands (Municipality) and privately owned lands. In line with the Project requirements, a total of 4,122 decares of land was acquired from 610 parcels. This chapter elaborates retroactively land acquisition in terms of land types and acquisition types.

4.1. General overview of land acquisition

GCP covers land acquisition performed for all facility areas of the Project, and land acquisition for energy transmission lines. The Project affects forestry lands the most, in terms of land acquisition. A total of 3,251.8 decares of forest land was acquired by the Project. Treasury lands make up 6% of the total acquired land. Privately owned lands make up 13% with 524 decares in total.

Figure 4.1. Land acquisition distribution.



Source: Acacia Mining 2017

Land acquisition varies depending on the project requirements. Lands acquired for Project facility areas²⁹ were acquired through mutual agreement with private owners and institutions like the Municipality. Energy Transmission Lines³⁰ were expropriated in line with Project requirements and the Urgent Expropriation Decision. Accordingly; lands of the institutions were expropriated in line with Article 30 of the Turkish Legislation; and privately owned lands were expropriated in line with Articles 27 and 10 of the Turkish Legislation. For expropriations for

²⁹ Facility areas include open pits, the WSF, the factory area, camp areas, the management office, tallow fields and transportation routes.

³⁰ For details of the Energy Transmission Lines see ANNEX 1

ETL; easement rights for private parcels was granted for most (470 decares) of the acquisition, yet permanent proprietary right was only for 4 decares.

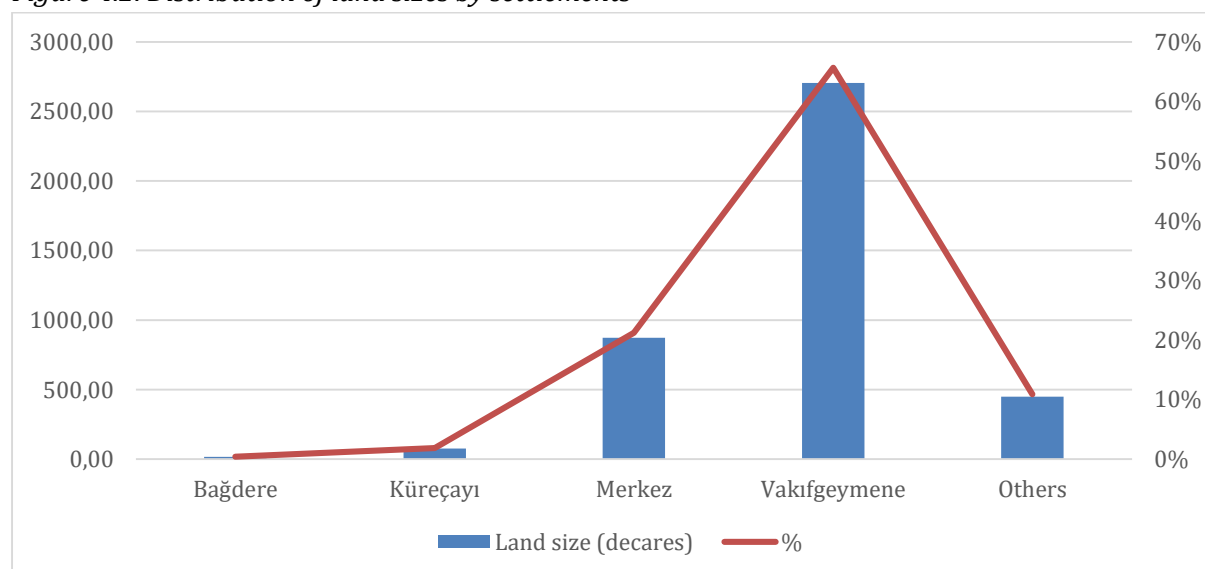
Table 4.1. Type and size of affected lands

Land type	Ownership (decares)	Easement (decares)	Total land (decares)	Number of Parcels
3rd party (including pastures)	–	33.99	33.99	22
Municipality	–	20.31	20.31	12
Treasury	–	232.9	232.9	35
Forestry	–	3251.8	3251.8	10
Private Acquisition	299.84	–	299.84	91
Private expropriation	–	224.45	224.45	224.45
Private leased	–	13.27	13.27	13.27
Unregistered (riverbed etc)	–	45.77	45.77	45.77
Total	299.84	3822.49	4122.33	610

Source: Acacia Mining 2017

Analyzing the land acquisition on the basis of settlements, it is seen that Vakıfgeymene is the settlement that is the most affected **from land acquisition for Project facilities** (Figure 4.2). 92% of the affected 2,719 decares of land in Vakıfgeymene are forest lands. Hanönü Merkez (Central) is the second most land acquisition-affected major settlement. Privately owned land acquisition affects Vakıfgeymene and Merkez neighbourhoods.

Figure 4.2. Distribution of land sizes by settlements



Source: Acacia 2017

Table 4.2. Land acquisition on the basis of settlements

Settlement name	Land Type	Land size (M2)	Number of Parcels
Bağdere	Treasury	11,560	2
Bağdere	Forestry	5,048	1
Küreçayı	Forestry	77,352	2
Merkez	Municipality+ Treasury	93,250	12
Merkez	Forestry	682,841	2
Merkez	Private	97,690	39
Vakıfgeymene	Pasture	2,260	5
Vakıfgeymene	Forestry	2,486,559	5
Vakıfgeymene	Private	216,980	67
Other	Pasture	31,730	17
Other	Municipality+ Treasury+unregistered	194,170	106
Other	Private	222,890	352
Total		4,122,330	610

4.2. Land Acquisition for ETL

More settlements are affected by the ETL compared to by facility land acquisition, since the ETL is line. ETL land acquisition affected 6 settlements in Hanönü district (1 neighborhood, 5 villages), 5 settlements in Taşköprü district (2 neighbourhoods, 3 villages); impacting 11 settlements in total. Within the scope of ETL, Property acquisition and easement were performed for privately owned, forest, treasury, pasture and 3rd party institutions' lands. A total of 485 parcels was affected. Size of the area where ownership expropriation was completed corresponds to 3,684 m2 while the size of the area where easement was established corresponds to 470,245 m2.

Table4.3. Land acquisition on basis of settlements (ETL).

District	Settlement	Type	Land Acquisition		Number of Parcels	Ownership Expropriation (M2)	Easement (M2)	TOTAL (M2)
Taşköprü	Musalla	Neighborhood	Article (TEİAŞ)	30	1	0	1,061	1,061
Hanönü	Merkez	Neighborhood	Article (Hanönü Municipality Graveyard Area)	30	3	0	6,277	6,277
Hanönü	Küreçayı	Village	Article (Küreçayı Village Legal Person)	30	1	0	1,018	1,018
Taşköprü	Musalla	Neighborhood	Public Property (Pasture)		1	50	6,870	6,920
Taşköprü	Eskiatça	Neighborhood	Public Property (Pasture)		1	72	10,867	10,938
Taşköprü	Çördük	Village	Public Property (Pasture)		6	158	8,584	8,742
Taşköprü	Kornopa	Village	Public Property (Pasture)		7	78	12,356	12,434
Hanönü	Bağdere	Village	Public Property (Pasture)		1	0	894	894
Hanönü	Küreçayı	Village	Public Property (Pasture)		1	26	1,978	2,004
Taşköprü	Hamzaoğlu	Village	Forestry		1	73	6,556	6,629
Hanönü	Sirke	Village	Forestry		5	235	23,901	24,136
Hanönü	Bölük yazı	Village	Forestry		1	241	26,061	26,302
Hanönü	Küreçayı	Village	Forestry		4	255	46,753	47,008
Hanönü	Merkez	Neighborhood	Forestry		2	482	25,634	26,116
Hanönü	Bağdere	Village	Forestry		1	144	9,839	9,983
Taşköprü	Çördük	Village	Treasury		4	32	3,488	3,520
Taşköprü	Hamzaoğlu	Village	Treasury		4	0	1,283	1,283
Hanönü	Sirke	Village	Treasury		7	42	2,557	2,600
Hanönü	Küreçayı	Village	Treasury		1	0	637	637
Hanönü	Bağdere	Village	Treasury		1	0	1,727	1,727
Hanönü	Kornopa	Village	Treasury		2	21	1,353	1,374
Taşköprü	Musalla	Neighborhood	Person		16	211	8,813	9,024
Taşköprü	Eskiatça	Neighborhood	Person		6	81	6,181	6,262
Taşköprü	Çördük	Village	Person		73	312	53,991	54,303
Taşköprü	Kornopa	Village	Person		95	410	51,809	52,218
Taşköprü	Hamzaoğlu	Village	Person		67	289	41,319	41,608
Hanönü	Sirke	Village	Person		41	166	22,097	22,263
Hanönü	Akçasu	Village	Person		16	71	13,368	13,440
Hanönü	Bölük yazı	Village	Person		7	25	4,344	4,369

Hanönü	Küreçayı	Village	Person	26	163	17,344	17,507
Hanönü	Bağdere	Village	Person	2	0	1,836	1,836
Hanönü	Merkez	Neighborhood	Person	8	47	3,349	3,395
Taşköprü	Musalla	Neighborhood	Non-Registered (3rd Party Institutions)	4	0	3,158	3,158
Taşköprü	Eskiatça	Neighborhood	Non-Registered (3rd Party Institutions)	3	0	3,127	3,127
Taşköprü	Çördük	Village	Non-Registered (3rd Party Institutions)	11	0	2,517	2,517
Taşköprü	Kornopa	Village	Non-Registered (3rd Party Institutions)	19	0	26,985	26,985
Taşköprü	Hamzaoglu	Village	Non-Registered (3rd Party Institutions)	12	0	1,744	1,744
Hanönü	Sirke	Village	Non-Registered (3rd Party Institutions)	9	0	1,945	1,945
Hanönü	Akçasu	Village	Non-Registered (3rd Party Institutions)	4	0	1,073	1,073
Hanönü	Küreçayı	Village	Non-Registered (3rd Party Institutions)	7	0	3,568	3,568
Hanönü	Merkez	Neighborhood	Non-Registered (3rd Party Institutions)	4	0	1,985	1,985
Total				485	3,684	470,245	473,929

Source: Acacia 2017.

4.3. Forestry lands

The project acquired forest lands the most. Since Vakıfgeymene and Merkez neighbourhoods are linked to the districts center, they **do not qualify as forest villages** and have restrictions against PAPs benefiting from the forest³¹. Bağdere, Küreçayı and Gökçe ağaç villages on the other hand qualify as forest villages, thus have forestry cooperatives.

The Project has the necessary permits for forest use. A total of **TRY 31,329,171** was paid by the end of 2017, for 3251.80 decares of forest land in the facility area. Values paid for forest use include land permit price, forestation value and security deposit. Land permit price comprises about 81.5% of the forest payments.

Table 4.4. Forest values.

Year	2017	2016	2015	2014	Total
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³¹ Paragraphs 31, 32 and 33 of Forestry Law No. 6831 regulate how forest villages can benefit from forests.

Land Permit	7,377,319	6,986,536	6,859,267	4,336,538	25,559,660
Forestation	194,175	69,885	2,880,218	1,826,987	4,971,265
Security	83,261	12,481	375,072	327,432	798,246
Total	7,654,755	7,068,902	10,114,557	6,490,957	31,329,171

Source: Acacia 2017

Project's forestry land acquisition comprises 1 percent of the Hanonu's forestry capacity. Discussions with mukhtars, forestry cooperatives, PAPs have revealed loss of forestry is not expected to cause significant livelihood impact since there are alternative forest resources within the District. Nevertheless, Acacia aims to decrease its footprint by minimizing land intake. Example case on how Acacia decreased forest land acquisition is presented below.

Case study: Acacia Mining minimizing negative effects of using forest lands
Acacia Mining Operations has a dump site and the necessary permits of forest use for the TSF site. In line with the requests from Yılanlı neighborhood and meetings with the Forestry Operation Directorate, 27,500 m² of fire road was opened to the Forest and for PAPs, which then later became a regular road. Also, as a result of the meetings with the PAPs; 111,366 m² allocated for waste rock was reduced to 64,208 m² and 48,158 m² of land intake was reduced. Moreover, upon request of Hanönü Forest Directorate and Kuzaluç village 90,000 m² of forest access road was built as forest fire road.

4.4. Treasury land

Pasture and treasury lands were acquired in line with the Project requirements. Project affected for pasture lands are in Dereköy village of Vakıfgeymene settlement. Dereköy pasture land is affected by the Project's diversion tunnel and other constructs. Since livestock is an important livelihood for Dereköy, Acacia Mining Operations held a meeting with Vakıfgeymene neighborhood Mukhtar and members on 01.04.2015, and agreed on finding new pasture lands than those affected by the Project. In accordance with this agreement:

1. The new land will be +/- 20% of the existing land in size.
2. The new land will be within the region of Dere neighborhood and the fields of the people, or the closest possible to this region.
3. The new land will be suitable to its qualifications.
4. The construction of tunnels will be completed within 12 months following the termination and commissioning dates.
5. The new land will be rented, unless required by the force majeure. The rent price to be paid to field owners will be assumed by Asya Mining Operation (the title used at the time of agreement).
6. Asya Maden İşletmeleri A.Ş. will compensate the cultivation expenses for tailoring the purchased area for animal grazing and land arrangement expenses.

Following this agreement, Acacia Mining Operations purchased the private property of 20,849 m², block No. 105/69, for TRY 300,000 deed price, on 11.11.2015, to use as pasture land, in Dereköy neighborhood. Acacia leased the parcel next to the new pasture for three years in order to open an access road for livestock to the pastures. Yet, this is a temporary solution for access road, and negotiations are ongoing for finding a permanent solution for access roads to

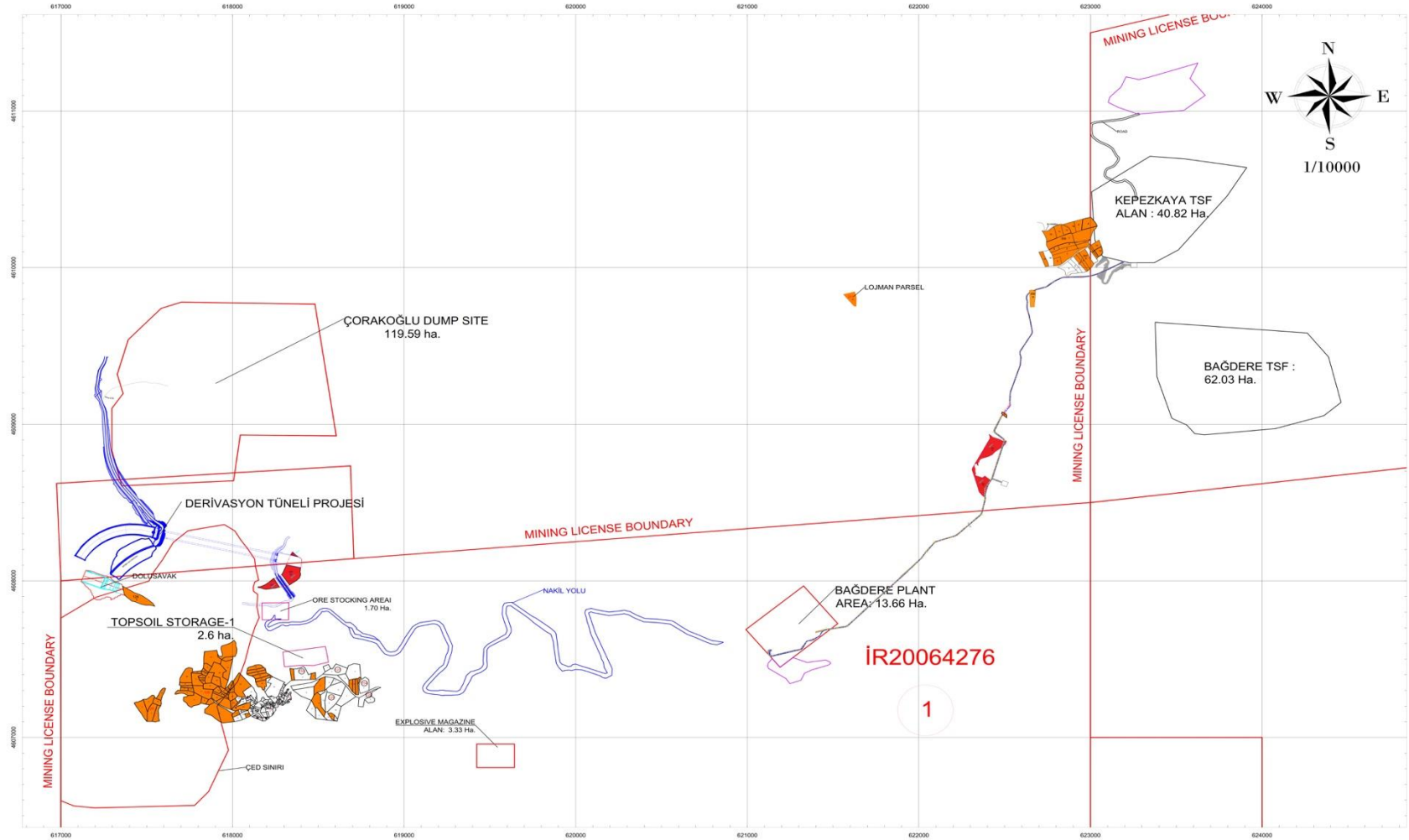
the new pastures. Moreover, Acacia will invest in pasture improvement program to boost the animal feed capacity.

Table4.5. Land acquisition by settlements.

Settlement	Land Type	Land Size (M2)	Number of Parcels
Bağdere	Treasury	11,560	2
Merkez	Treasury	93,520	12
Vakıfgeymene	Pasture	2,260	5
Others	Treasury- Municipality- Pasture-TML included	225,900	123
Total	Treasury	333,240	142

Source: Acacia Maden İşletmeleri, 2016.

Map: Acacia Mining, Purchased Parcels



4.5. Graveyard³²

Within the scope of Project's land acquisition, one alternative for additional TSF is in Bagdere. While Bagdere facility is one of the alternative sites for additional TSF capacity which is likely to be required after first phase of operation, land acquisition surveys revealed that TSF construction may affect the graveyard on Merkez neighborhood main highway. If Bagdere TSF is considered as the preferred alternative, then 15 graves within the graveyard's limits will be transferred to another part of the graveyard, with respect to cultural and religious obligations; with a protocol to be signed with the Municipality. The protocol will also declare that the Municipality will perform no more burials within the Project site of Acacia Mining Operations. Acacia Mining Operations will assume the responsibility for preparing the new graves and arranging the graveyard. Acacia Mining Operations will offer to the Municipality technical and financial assistance for landscape and graveyard arrangements³³.

4.6. Private Parcels

Land acquisition for private parcels started in 2013 and was completed end of 2016. Land acquisition for private parcels was carried out through willing buyer willing seller agreements.

Land acquisition started with feasibility drilling works. Land owners were met face to face, offers were made on a set price and consensus was reached through mutual agreement.

4.6.1. Land valuation

Value assessment was based on the handover values of the lands in the district. Acquisitions were made with permission of the seller on the market price of the land. Land acquisition process started in 2013 and continued by the end of 2016. In this period, land values increased due to negotiation based supply-demand and inflation. Settlement based prices and the reasons for the changes in prices are stated below.

4.6.2. Asset valuation- houses

AMI has a land acquisition policy and procedure which follows EBRD PR 5 for asset valuation. During the land acquisition of the Project no houses were acquired. However, AMI adheres to the principles that any additional land/immovable asset needed by the Project will be acquired by:

- Willing buyer seller negotiations
- Full census for assets that includes asset valuation at full replacement cost plus any transactional costs
- Resettlement action plan that includes additional mitigations AMI will provide such as resettlement assistance

³² For further information, see **ANNEX 3 Annotation for WSF Site's Impact on the Graveyard**.

³³ The content of the protocol may change within the framework of the agreement to be signed between Acacia Mining Operations and the Municipality. Negotiations about the protocol's content are still ongoing as this report is being prepared.

4.6.2.1. Land Valuation for Vakıfgeymene Neighborhood Privately Owned Parcels

Privately owned land acquisition from Vakıfgeymene neighborhood went through changes throughout the years. In total, 67 privately owned parcels were acquired between 2013 and 2015. The number of shareholders increased throughout the years, due to deceased parcel owners and multiple inheritance. In parcels with multiple shareholders m2 prices increased and this resulted in an increase in income per shareholder. Consultations were held with PAPs to assess how they used their private parcels prior to Project's land acquisition. All PAPs from Sepetcioğlu stated that they did not cultivate their land because they reside in the settlement only temporarily and do not utilize their land for agricultural income. Nevertheless, they use the gardens in front of their homes for growing seasonal vegetables.

Table 4.6. Vakıfgeymene land acquisition summary table

Location	Vakıfgeymene Neighborhood
Total Number of Parcels	67
Land Size (M2)	216,980
Payment Year	2013-2015
Paid Price	4.317.305
Land Price/m2	20
Number of Shareholders	397
Shareholder/TRY	10,666

Source: Acacia 2017.

Yearly information about policies for land acquisition and prices are stated below.

Table 4.7. Land acquisition in Vakıfgeymene by years³⁴

Year	Methodology	Total Number of Parcels	Land Size (M2)	Paid Price	Land Price/m2	Parcel TRY/m2	Shareholder TRY
2013	Land acquisition was made face to face. Between August-September 2013, acquisitions were made for 4 TRY/m2 (4 parcels) on average; and 1 single parcel was acquired for 6 TRY/m2. In October 2013, acquisitions were made for 5 TRY/m2 (12 parcels).	17	55,124	261,713	5	15,395	6,231
2014	Land acquisitions started in February and ended in November. Almost all of the acquisitions between February-August 2014 were made for 5 TRY/m2 (10 parcels). 1 single parcel was acquired for 8 TRY/m2. All of the acquisitions in November were made for 11 TRY/m2 (25 parcels).	36	82,111	825,182	10	22,922	6,655

³⁴ All private land acquisition of the Project main facilities was done by willing buyer seller

2015	<p>Land acquisitions took place between April and November. Previous land acquisitions drove the land market considerably up in the district. In consequence of the negotiations, 5 parcels were acquired for 14 to 27 TRY/m2.</p> <p>Since there were many parcel shareholders, they wanted to raise the land value of their share; which resulted in a significant change in land prices.</p> <p>For 8 parcels in total, with 19 and 31 shareholders, payments were made without regard to land size. About TRY 13,631 was paid per shareholder, for the parcels with 19 shareholders; and about TRY 11,031 was paid per shareholder, for the 5 parcels with 31 shareholders. Which made land unit price 49 TRY/m2 for parcels with 19 shareholders; and 153 TRY/m2 for the 5 parcels with 31 shareholders. The last acquired land in November was the parcels with 31 shareholders.</p>	14	79,745	3,230,410	44	242,113	13,625
Total/Average		67	216,980	4,317,305	20	64,157	10,666

Source: Acacia 2015.

4.6.2.2. Land Valuation for Merkez - Yılanlı Region Private parcels

The land acquisition of the Project is completed. The last land acquisition was made from Yılanlı locality of Merkez neighborhood. In total, 18 parcels were acquired in 2016.

In 2015, parcels from Vakıfgeymene neighborhood were acquired for 15 TRY/m². This value was considered as the basis and in line with the meetings with the households, it was decided that all private parcels from the region would be acquired for 15 TRY/m², and land acquisition was performed accordingly.

Table 4.8. Yılanlı neighborhood land acquisition summary

Location	Merkez neighborhood Yılanlı locality
Total Number of Parcels	18
Land Size (M2)	68,103
Payment Year	2016
Paid Price	1,021,581
Land Price/m ²	15
Number of Shareholders	43
Shareholder TRY/m ²	23,758

Source: Acacia 2015.

4.6.2.3. Land Acquisition Price Summary

Payments for privately owned parcels changed throughout the years. They were made for 4 TRY/m² in 2013, which increased to, generally, 15 TRY/m² by 2016. This is because the land market in the district is driven up and land owners have higher expectations due to the Project land acquisitions.

Apart from this, in the 8 parcels with 19 and 31 shareholders, land value was paid with regard to land value per shareholder, not the acquired area size. The basis land value for Merkez - Yılanlı in 2016 was 15 TRY/m². Household owners were agreed without regard to number of shareholders and such criteria, and payments were made.

Table 4.9. Privately Owned Land acquisition summary

Number of acquired Privately Owned Parcels

	Vakıfgeymene	Vakıfgeymene	Vakıfgeymene	Merkez-Yılanlı	
M ² /TRY	2013	2014	2015	2016	Total
4 TRY/m ²	4	0	0	0	4
5 TRY/m ²	12	10	0	0	22
6 TRY/m ²	1	0	0	0	1
8 TRY/m ²	0	1	0	0	1
11 TRY/m ²	0	25	0	0	25
14 TRY/m ²	0	0	1	0	1
15 TRY/m ²	0	0	2	18	20
18 TRY/m ²	0	0	1	0	1
27 TRY/m ²	0	0	1	0	1
49 TRY/m ²	0	0	3	0	3

153 TRY/m2	0	0	8	0	8
Total	17	36	16	18	87

Source: Acacia 2016

4.7. Eligibility and Entitlements

PAPs were and will be (if the Project requires additional land acquisition) eligible for compensation and other assistance if they have a “legitimate interest” in respect of eligible “immoveable assets” in the Project Area that are in place (i.e. established, in the case of crops and trees or constructed, in the case of structures) at the time of the Entitlement Cut-Off Date. Users of land with no recognizable legal right or claim to the assets they are using are considered eligible for compensation and assistance. Immoveable assets could include:

- Land and crops
- Immoveable structures: structures used for living, sleeping, cooking and storage, and other structures such as latrines and wells; institutional structures such as schools; business structures such as shops and barns (Currently no residential structures will be impacted by the Project, hence no Physical Displacement of Project-Affected People will occur)
- Roads: all government recognized roads
- Transmission lines.

The inventory of immoveable assets has already been prepared by the Project and detailed under Land acquisition chapter. Together with the compensation and assistance they provide the basis for the development of an appropriate detailed range of mitigation measures in the form of appropriate and fair compensation and assistance for identified impacts. Based on Impacts an

Entitlements Matrix has been developed that identifies the following:

- All categories of affected people
- All types of loss associated with each category
- All types of compensation and assistance to which each category is entitled.

The Impacts and Entitlements Matrix is set out as follows in Table 4.10

Table 4.10. Entitlement Matrix

Impact Category	Entitlement
Owners of Certified, Privately Owned Parcels	
Land loss	a. Land acquisition with permission, b. Purchase over full replacement cost,
Construction/Equipment loss	a. Acquisition with permission, b. Acquisition over full replacement cost, c. Households have recovery right for reusing affected equipment

Impact Category	Entitlement
Product loss	a. Adding product loss to the land value, b. Ensuring that households can purchase/use their products, if they can
Tree loss	a. Including tree losses in the land value, b. Supporting households for using/gathering their products, if they have the means, c. Households can cut down and move trees on their own, provided that they notify the Regional Directorate of Forestry, d. Giving the cut-down trees to households for use
Deed costs	a. Acacia Mining Operations will compensate for sales, transfers, warrants etc. notary and deed costs.
<i>Housing Loss due to operational impacts</i>	
Owners of Certificated Houses	a. Resettlement Action Plan (RAP) will be prepared the way international institutions require, b. Construction costs will be calculated over the full replacement cost, impact-reducing measures/strategies will be determined by RAP, for all households.
Users of the Houses	a. Resettlement Action Plan (RAP) will be prepared the way international institutions require, b. Impact-reducing measures/strategies will be determined by RAP, for all households.
<i>Users with no Legal Rights/Partners (Treasury, KTK, Non-Registered lands)</i>	
Product loss	a. Legally approved product loss costs will be paid to the households,
Construction/Equipment loss	a. Construction values will be paid to the households, over the full replacement costs, b. Households have recovery right for reusing affected equipment
Tree loss	a. Tree values will be given to households, b. Households can cut-down and move their trees, c. Giving the cut-down trees to households for use
<i>Non-Privately Owned Lands</i>	
Forestry lands	a. Land acquisition in line with the Turkish legislation,
Pasture lands	a. Land acquisition in line with the Turkish legislation, b. Meeting with countrymen whose pasture lands are affected and getting the written approval of the majority, c. Providing new pasture land for households to make up for the acquired pasture lands, d. Ensuring households' access to pasture areas (roads, etc.),
Treasury lands	a. Land acquisition in line with the Turkish legislation,
<i>Affected Common Lands</i>	
Graveyards	a. Moving the affected graves, b. Meeting with the relatives of the deceased and getting their approval, c. Conducting the legal work and environmental arrangement for the new grave site
<i>Persons Suffering from Income Loss due to the Project</i>	

Impact Category		Entitlement
Directly Affected Households		<ul style="list-style-type: none"> a. Prioritizing affected households in construction and operation periods, b. Organizing vocational training and courses, c. Conducting livelihood developing applications, activities and programs, d. Organizing social responsibility projects for a common goal for households, e. Preparing the Community Development Program for the households to determine the scope of livelihood restoration works, f. Detecting and eliminating households' victimization through the complaint-request mechanism
Affected land shareholders who are users		<ul style="list-style-type: none"> a. Getting the land users to benefit from livelihood restoration opportunities and prioritizing them in doing so
<i>Vulnerable groups</i>		
Vulnerable groups		<ul style="list-style-type: none"> a. Paying attention to informing especially the vulnerable groups about the Project and ensuring that they benefit from livelihood restoration programs and social responsibility assistances, b. Supply and heating assistance for the elderly and/or poor, c. Visiting and monitoring the conditions of vulnerable groups,
<i>Energy Transmission Line-Affected Households</i>		
Land loss		<ul style="list-style-type: none"> a. Getting the property of pole areas and easement for the line, through expropriation, b. Paying the highest determined price to the households, at the end of expert and value assessment works, c. Paying the difference with the highest price to the households, if the court decides on a lower price
Product loss		<ul style="list-style-type: none"> a. Prioritizing works for personally owned parcels so the works can be completed before the fields are cultivated, b. Including product costs in the land value, c. Compensating for the damaged crops.
Tree loss		<ul style="list-style-type: none"> a. Including values of trees in the land value, b. Detecting and eliminating the victimization of households through the grievance mechanism
Court, notary and transportation expenses		<ul style="list-style-type: none"> a. Acacia Mining Operations covering the court and proceedings expenses, b. Covering the notary expenses, c. Covering the certification and deed costs, d. Covering the transportation expenses of the households
Construction loss		<ul style="list-style-type: none"> a. Ensuring that the line passes from a safe distance to the construction-house, b. Compensating for any other loss

Chapter 5 Livelihood Restoration

One of the objectives of livelihood restoration plan is to give the PAPs³⁵ whose livelihoods/sources of income were negatively affected by the Project (economically displaced) a chance to develop or at least regain their incomes, production levels and living conditions. Project activities such as land acquisition, employment and local procurement have different types of impact on PAPs. Main categories of identified impacts that are expected to affect the livelihoods of the PAP are as follows;

- Loss of private land
- Loss of forestry land
- Local recruitment
- Local procurement
- Community health and safety
- Loss of pasture
- Partial loss of water supply
- Increased traffic
- Workforce influx

The entitlement matrix provides in-kind and cash based compensation packages. This chapter elaborates in detail in-kind compensations and Project's benefits to PAPs in order to ensure sustained livelihood restoration. Some issues prevailed in the reports regarding the two Hanönü Workshops³⁶. These issues and projects are to be the inputs of livelihood restoration. Initial ideas have been formulated and more detailed design of programs will be determined in detail during future village consultations.

5.1.Livelihood Restoration Programmes for PAPs

The following will be implemented PAPs (owners/users) who have lost private land:

a. Employment opportunities: These PAPs will be prioritized for local employment during construction and operation periods. A stable income is important for households. The project's employment opportunities both offer a stable income and ensure social security. Thus, AMI will give PAPs who lost land priority in local employment should their skill set meet job requirements.

³⁵ This intervention is targeting PAPs who have been impacted by livelihood loss due to Project's land acquisition. PAPs who did not use/utilize their land prior to the Project, and are not residing in the District are not eligible for LRP benefits.

³⁶ Workshop Report Annexes 4a and 4b give all the necessary details.

b. Organizing vocational training and courses: Employing the local people to meet the Project requirements is not easy since PAPs have a low level of education. LRP does not aim to employ PAPs as unqualified workers for the Project. LRP aims to engage PAPs in long-term, qualified labor force; within the scope of necessary trainings and courses. To this end, PAPs who lost lands will be the first to attend vocational trainings chosen by the Project. As a result of trainings, these PAPs will have transferrable skills to be employed in wide range of sectors.

c. Organizing practices, activities and programs to develop livelihoods: PAPs' livelihoods are centered around agriculture and livestock. Necessary measures will be taken for households that lost lands due to land acquisition and/or have limited access to grasslands. These measures aim to prevent decreases in agricultural income of households, to get them to their pre-Project level of income by creating different livelihoods and/or raising their level of income. Proposed activities include increasing product diversity, planting income-generating trees, increasing productivity in plant production, increasing greenhouse productivity and informing about animal health. Moreover, AMI will utilize the parcels in Yılanlı District in front of TSF for agricultural development and livestock production. AMI will allow the communities to use the parcels in **Yılanlı District in front of TSF** that is not required for operation for agricultural development and livestock production and will explore development opportunities in this area.

5.2.Loss of Forestry land

The impact on forestry land is limited (1 percent of total forest available for the communities), yet the Project will implement the following strategies to mitigate loss:

- Project on the Improvement of Vocational Competence in Forestry Sector, Construction and Mine Labor (tree cutting and stringing operating and vocational capacity training for the mining sector)
- Afforestation with Income Generating Types of Trees (villagers gaining products received from the lands created by afforestation with high yielding, climate-appropriate types of trees [walnut, almond, rose hip, wild pear])

5.3.Local Recruitment

The Project will emphasize local recruitment especially from Project affected settlements (PAS). In addition to livelihood restoration programs, local employment will prepare an important role to mitigate impact and to improve livelihoods of affected settlements. AMI is committed to employing local PAPs at the mine. In order to assess local employment benefits, the Project has prepared a Local Employment Policy and an Influx Management Plan. Local employment will be ongoing for the life of mine, AMI will implement skills building programs and on the job training programs with partnering organizations to develop a skilled local workforce for contractors/AMI.

5.4.Local procurement

AMI and subcontractors will prioritize local procurement in order to boost local economy and support local entrepreneurship. To achieve this objective in the most effective manner and maximize the Project benefits to the PAPs AMI has prepared a local procurement manual. Local procurement of the Project will be done in line with the local procurement manual with identified vendors.

5.5. Community health and safety

AMI is committed to non-disturbance of the livelihoods of the PAPs due to community health and safety impact. In order to do that AMI has designed different tools which has been detailed under EIA Volume I, community health and safety chapter. However other than the mitigations defined under EIA, AMI will also record PAPs grievances through the Grievance Mechanism: It is important that the Project has an active grievance mechanism that PAPs can submit their complaints to, that complaints and requests are documented and responded by the Project; in terms of the Project's relation with the PAPs. It is easier to follow and resolve complaints if PAPs submit their victimization and complaints within the framework of a system

5.6. Loss of pasture

Pasture lands are acquired in line with the Turkish legal legislation. Since pasture lands are actively used as common lands for the PAPs, AMI has acquired replacement pasture land to ensure that livestock production is not impacted by Project's land acquisition.

Replacement pastureland for the communal users aims to enable sustainable livestock production. In addition to this AMI will also implement a pasture improvement program. This program entails improvement of pasture productivity and hence increases income gained from livestock production.

The pasture improvement program will consist of following activities;

- **Placing watering troughs** to the pasture areas for the use of animals. If there is a water resource near the pasture area there should be at least 3 watering troughs (each 3 meters long) placed in the pasture. These water troughs should be made from rustproof (stainless) steel. For very cold climates it is advised to build these watering troughs from cement structures.
- **Building shady spots** in pastures where there are not enough trees to make shade for animals is vital. The animals can use these shady spots during very hot sunny days and rainy days as shelter to protect them from heat and rain. The shade will be constructed by metal sheets that are placed on top of metal structures. Each shade area should be at least 50 m² and placed near the water troughs.
- **Salting areas;** Animals salt intake has a tendency to decrease as result of consumption of green grass in the pasture areas. This can cause metabolism failures among grass fed animals. In order to mitigate this salt loss, it is recommended to place salting areas around the pasture areas as seen in the photo below. These can be made from cement or stone and salt can be placed on top of these cement/stone structures for consumption of the animals in need.
- **To improve pasture access roads** in order to reach pasture areas. Access roads are important for animals and PAPs to use in order to access pasture areas and carry agricultural materials and equipment that is necessary to the pastures.
- **Planting wheat and leguminous seeds around the pasture area in order to increase pasture yield.** Plant trefoil, clover, triticale and oats seeds will increase the pasture animal feed yield and hence will result in increase in livestock capacity and the duration that animals benefit from the pasture area.

5.7. Partial loss of water supply

AMI is committed to providing alternative water resources to PAPs that have been impacted by loss of water. AMI will monitor the status and levels of water via regular water M&E which will

be conducted by environmental monitoring and also via the stakeholder relations and grievance mechanism. In cases where issues arise due to loss of water, AMI will supply alternative water resources to the PAPs that are impacted. AMI has already provided Sepetcioglu settlement with alternative water supply, if in the future, Project impacts other water supply of Kupeli or other settlements, AMI will supply alternative water supply.

5.8. Workforce influx

AMI has developed a influx management plan to mitigate the impact of increased traffic in the Project area.

Influx management plan sets out following commitments;

1. Establishing and maintaining effective communication with stakeholders,
2. Minimizing the labour force supply from outside the region through local employment,
3. Monitoring the impacts of migration and related population increase, and assessing the effectiveness of measures taken,
4. Providing various supports for the capacity building of local institutions and stakeholders in their responsibility areas,
5. Informing and supporting relevant institutions to develop measures against pressure and problems that may be caused by the increased demand for infrastructure and public services, and
6. Establishing participatory mechanisms including local stakeholder representatives such as Hanönü Advisory Council or Community Advisory Panel.

5.9. Vulnerable PAPs

- a. The Project's vulnerable groups include the elderly, the landless and women. Disabilities are the result of chronic diseases due to old age; only one household has a young chronic patient. The Project plans to conduct special communication works for households in vulnerable groups. Vulnerable groups will be informed with a household-oriented approach and benefit from livelihood restoration programs and social assistance by AMI.
- b. Programs to provide equal opportunities for employment of women and women's capacity building will be supported. Works for increasing the capacity of Hanönü Association for Women's Solidarity, which was founded with the support of the Project, are being conducted together with the association³⁷. The Project will prioritize training of women; programs regarding women will be an important part of LRP. Women will be targeted for alternative development programs within LRP such as greenhouse vegetable production, orchard building in order to sustain land based livelihoods.
- c. Provide in-kind household supplies and heating assistance for the elderly and/or poor would be beneficial in terms of decreasing household related expenses.
- d. Continuous visiting and monitoring of the conditions of vulnerable groups in order to confirm that they are not worse off because of Project's activities.

³⁷ Please see Women's workshop findings at Annex 4.a

Chapter 6 Consultation and Stakeholder Relations

Projects causing physical or economic displacement have the obligation to regularly inform the public and meet with the public within the framework of the processes and procedures set by the project management, in addition to the public meeting requirements; as enshrined in EBRD Performance Requirement 10. Effective project management and social risk management require regular meetings with the project stakeholders on a variety of topics. It includes the stakeholders engaging in the project management process as much as possible and the Project management effectively resolving all complaints and requests related to the Project.

Early stakeholder engagement helps manage the expectations of the public for the effects and benefits of the Project.

There is a separate Stakeholder Engagement Plan (SEP) prepared for the Project and aims to designate the stakeholders and to define their roles and engagement capacities. SEP defines communication ways with the stakeholders and draws a road map for the Project to succeed, with respect to the options and restrictions of engagement, so that the Project can continue in a transparent, inclusive, cooperative way that responds to the requests of the public.

The aim of Stakeholder Engagement Plan (SEP):

1. Ensuring that the Project moves on an inclusive way that benefit the public interest,
2. Set out all the stakeholders planned to take part in GCP, defining their roles and engagement capacities and relationship of each to the Project, the form and frequency of engagement
3. Directing the relations of GCP team with the stakeholders during the Project set-up and operation period,

Supporting Environmental and Social Impact Assessment by putting forward the potential or apparent impacts and concerns about the Project; and effectively resolving these concerns.

6.1. Acacia Mining Operations stakeholder engagement works

There is a dedicated community relations office in Hanonu central district which is easily accessible to all PAPs.



Many stakeholders from Hanönü Merkez and nearby villages and representatives of official district institutions participated. Main objectives of the Community Relations Office:

- Keeping the stakeholders up-to-date on the Project,
- Informing them on the job application process to meet the Project's employment requirements,
- Discussing the complaints and requests of the stakeholders,
- Getting opinions and suggestions of the stakeholders on the Project.

This office will also be the main connection of stakeholders to Acacia Mining Operations, during the process of the Project. Community Relations Office will be open between **9:00 and 17:00 on Wednesdays and Fridays**, when the weekly bazaar is open. Stakeholders will be met in the office.

Also, to keep alternative communication lines open, stakeholders can visit Acacia Mining Operations Management Office; and report their complaints and requests via telephone or e-mail (halklailiskiler@acacia.com.tr).

Apart from these, 20 bulletin boards and complaint/request boxes are prepared to be set up in affected settlements, to develop the complaint and request mechanism and ease engagement of the stakeholders in the process. Stakeholders can submit their complaints or requests with petitions and/or forms to Acacia Mining Operations using these boxes; and Acacia Mining Operations will respond to the complaints/requests as soon as possible.

6.2. Stakeholder Engagement Activities of the Public Relations Office and Opinions of the Stakeholders

Acacia Mining Operations conducted many stakeholder engagement activities since the start of the GCP. These meetings became much more systematic and regular especially following the opening of the Public Relations Office.

6.2.1. Village meetings

11.08.2015	Sepetçi, land acquisition and tunnel detonation activities
10.09.2015	Dereköy, pasture use, Hitit activities
12.04.2016	Yılanlı, mosque construction
14.04.2016	Bağdere, the village's needs, village hall construction, Atilla activities

20.05.2016	Sepetçi, purchase of houses, processes of the Project
13.06.2016	Dereköy, pasture land, losses due to activities
18.06.2016	Yılanlı, Gencer Mining activities, stockyard route
10.08.2016	Merkez, purchase of local goods and services, employment process
16.09.2016	Bağdere, Atilla activities, occupational health safety
12.10.2016	Merkez, shopping from the artisans, local employment, vocational courses

6.2.2. Meetings at the Public Relations Office

- 23.09.2016 meeting with mukhtars (on the effects of the Project, information about local employment, complaints and requests)

6.2.3. Meeting for Informing the Public and Consultation

- 25.05.2016 - Overall structure of the Project, employment process and information about social and environmental impacts
- Public Information Meetings are planned in direct proportion with the progress of the Project

6.2.4. Workshops³⁸

- The First Hanönü Workshop 25 February 2016
- The Second Hanönü Workshop 10 May 2016

6.3. Grievance Mechanism

In line with the international requirements, Acacia Mining Operations established a grievance mechanism to get and respond to the complaints about social/environmental concerns of the Project affected population. This mechanism aims to manage the Complaints from stakeholders of GCP, including Project Affected Persons, Non-Governmental Organizations, workers, third parties and other members of the community; and to designate the process and liabilities to follow. All complaints regarding land acquisition, except those brought to the court, are to be collected and resolved through the grievance mechanism.

Acacia Mining Operations will be easy to get in touch with and respond to all complaints as quickly as possible. The most important point of the complaint/request mechanism is ensuring that all complaints/requests are gathered and registered effectively, that the public relations office on the site responds to the complaints/requests within the designated time period in accordance to their content and that it ensures that both parties agree to the amendment/regulation. Thus, responses to the complaints would be satisfactory for both parties; the activities would be followed; and complainant would be informed about the results of corrective actions.

³⁸ All workshops are reported separately based on outputs. They are in the project archives of Asya Mining.

In the Project, Acacia Mining Operations public relation experts are responsible for communications with the local people, authorities and other stakeholders, informing them about the Project when necessary, following and registering their concerns, getting and regularly registering their complaints and requests, sharing these with the Acacia Mining Operations Project team in Ankara to resolve them as quickly as possible.

Additionally, Acacia Mining Operations Public Relations Department will be in constant contact with mukhtars. Mukhtars, being the authorities in local settlements, are also responsible for informing the local people about the Project and conveying the people's requests to Acacia Mining Operations. For this, Public Relations Office was established. Project affected persons can visit the office and file their complaints.

GCP and all related contractors use this grievance mechanism. Contractors have their own social management plans that they integrate with their procedures, but they use the GCP grievance mechanism as well. Contractors will also effectively use the electronic data base to be set up for following and conveying the complaints. Subcontractors do not have access to the electronic data base but can use the manual grievance forms/printed copies of grievance forms; which will later be uploaded to the electronic data base by Gökırmak Copper Project Public Relations Department.

Grievance will be managed in line with the procedures defined in stakeholder engagement plan which has been prepared for the Project and EBRD performance requirement 10, and this procedure also includes the below-stated details; [1] [SEP]

- Complaints and requests are uploaded to the electronic data base by the Public Relations Expert, uploaded complaints are collected in the Complaint/Request portal.
- After being uploaded to the data base, complaints and requests are directed to the Public Relations unit manager. Unit manager conveys the complaint/request to the related unit.
- Public Relations Expert contacts the complainant/requester person/institution within 7 days to inform them that the complaint/request has been received, via phone and/or e-mail.
- Related units explain their opinions and suggestions in the Grievance or Request Registry Form, in written, and submit it to the Public Relations department within 7 days.
- Public Relations Expert prepares the suggested draft response and presents it to the unit manager. The draft response is discussed with the Operations Manager. The response is decided and approved.
- Public Relations Department conveys the Operations Manager signed response (Official Response) to the complainant/requester.

- Following the response; if the complaint/request is resolved successfully and the complainant agrees to the solution, Grievance or Request Registry Form is updated.
- A monitoring-assessment system is set up for complaints and requests. Monitoring process of complaints and requests is registered in the monitoring and assessment system, by filling in the date sections in the Grievance/Request Registry Form. During the assessment process, complainants/requesters are met 4 times a year, by an independent institution.

Figure 6.1. External Stakeholder Complaint and Request Scheme

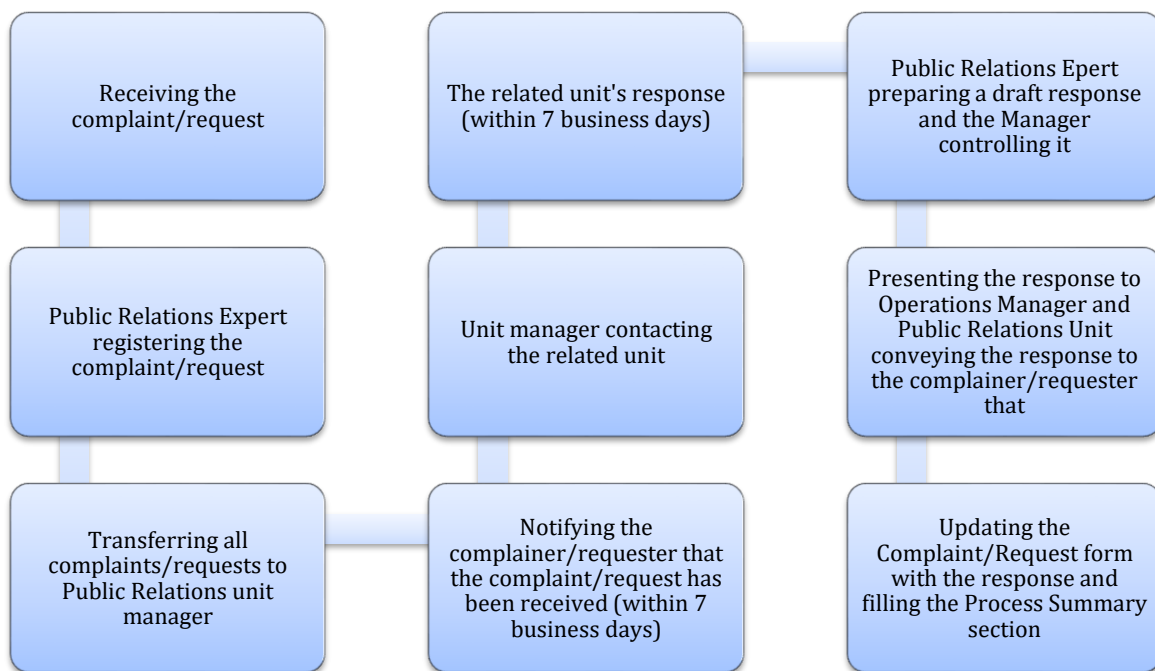


Table 6.1 shows the communication ways that internal and external stakeholders can use to convey their complaints.

Table 6.1. Contact information for Complaint / Request.

Type of Stakeholder	Contact	Communication Method			
		Website	Call center	Acacia Mining Operations Office	Email
Internal Stakeholders	In person, Petition, Email	www.acacia.com.tr	0366 497 55 56	Acacia Maden İşletmeleri İşletmeleri A.Ş. Mining Site Hanönü Mahallesi Alisakallı Caddesi No:26/A Hanönü / Kastamonu	info@acacia.com.tr
			0312 440 99 82	Acacia Mining Operations Kazım Özalp Mah. Karaca Sok.No:32/7 Gaziosmanpaşa - Çankaya / ANKARA	info@acacia.com.tr
External Stakeholders	In person, Petition	www.acacia.com.tr	0366 497 55 56	Acacia Mining Operations Public Relations Office Atatürk Meydanı No:5 Hanönü / Kastamonu; open between 09:00 - 17:00 on Wednesdays	halklailiskiler@acacia.com.tr

and Fridays

Chapter 7 Monitoring and Evaluation

7.1. Objectives

The objective of monitoring and assessment is to give Acacia Mining Operations feedback for GCP during the implementation of the livelihood restoration plan; and to make sure that regulations regarding implementations are made on time by detecting issues/problems and successes as early as possible. GCP's monitoring and assessment structure will include taking the necessary measures to productively conduct LRP; and implementing the necessary regulations during construction and implementation processes, so the process can continue under control; as stated in EBRD Performance Requirement 1. Acacia Mining Operations plans to conduct the necessary regulations during the monitoring and assessment process; to ensure the engagement of stakeholders in the Project's area of impact. As it can be seen from the inclusion to the monitoring process of a "monitoring committee", composed of local stakeholders and local public institutions; Acacia Mining Operations attaches great importance to stakeholder relations.

LRP monitoring for Gökırmak Copper Project is set to monitor the following subjects:

- Acacia Mining Operation's completely and timely conduct of the actions and plans stated in the LRP;
- The project affected people receiving their payments within the agreed time period;
- The LRP actions and cost measures improving the living standards and livelihoods of project affected persons in a sustainable way or being effective in restoration;
- Following the complaints and concerns of project affected persons and, if necessary, Acacia Mining Operations implementing the action/solutions to resolve these complaints and

The three components of the monitoring and assessment structure for Acacia Mining Operations Gökırmak Copper Mine Project will be:

- Performance monitoring (internal audit)
- Impact monitoring (external audit)
- LRP closing audit and reporting

GCP's LRP monitoring-assessment structure was designed in line with the above-mentioned components. Table 6.1 shows the details of these three components of the monitoring and assessment process.

The parties responsible for performance monitoring, impact monitoring and completion audit are as follows:

- Acacia Mining Operations GCP Social Group will be responsible for the management of performance monitoring (internal audit) process.
- Outside-the-company experts and consultants will be responsible for impact monitoring (external audits).
- Acacia Mining Operations GCP staff and outside-the-company consultants will support the LRP Closing Audit preparation process and reporting.

Table 7.1. Monitoring Categories

Component Activity	Type of Information/Data	Source of Information/Data Collection Methods	Responsibility for Data Collection, Analysis and Reporting	Reporting Frequency/Group
Performance monitoring (internal audit)	Measuring whether entry indicators ³⁹ are compatible to the suggested time schedule; supplying and physically delivering goods, structures and services	Semi-annual situation reports and financial reports	Acacia Mining Operations GCP Social Group, Construction crews and subcontractors	Acacia Mining Operations preparing monitoring and assessment reports semi-annually.
Impact monitoring (external audit)	Following effectiveness of the inputs against the current situation indicators Assessing whether or not satisfactory outcomes are given to GCP, based on the inputs	Conducting semi-annual qualitative and quantitative surveys Regularly meeting with the people and consulting project affected persons; analyzing the outcomes of the grievance mechanism	Outside-the-company consultants and independent experts	Preparing semi-annual monitoring and assessment reports.
Completion audit	Measuring outcome indicators such as productivity gain, livelihood restoration and the effects of developments compared to the current situation.	Performance and impact monitoring reports, external assessments/process termination report is prepared based on independent surveys and consultations	Contracted external monitoring and/or assessment experts	After the LRP schedule is completed

³⁹ **Entry indicators**, include the resources in the GCP in terms of equipment and tools. The following are examples for GCP entry indicators;

(a) Resources and funds for some GCP activities

(b) Forming the land acquisition team.

Outcome indicators, include activities and services prepared in entries. Land acquisition database and compensations for land losses etc. would be examples of GCP outcomes;

Process indicators reflect the possible changes that may arise before and after GCP, in terms of quality and level of access and scope of activities and services. An example would be setting up the grievance mechanism, meeting with the people and establishing information channels.

Result indicators include conducting impact mitigating activities and the measures taken to compensate for physical and economic losses; restoring agricultural production and livelihoods and compensating for the loss, changes in Project Affected Persons and in the people's approach to the Project, the use of compensations for income-generating activities, etc. would be examples.

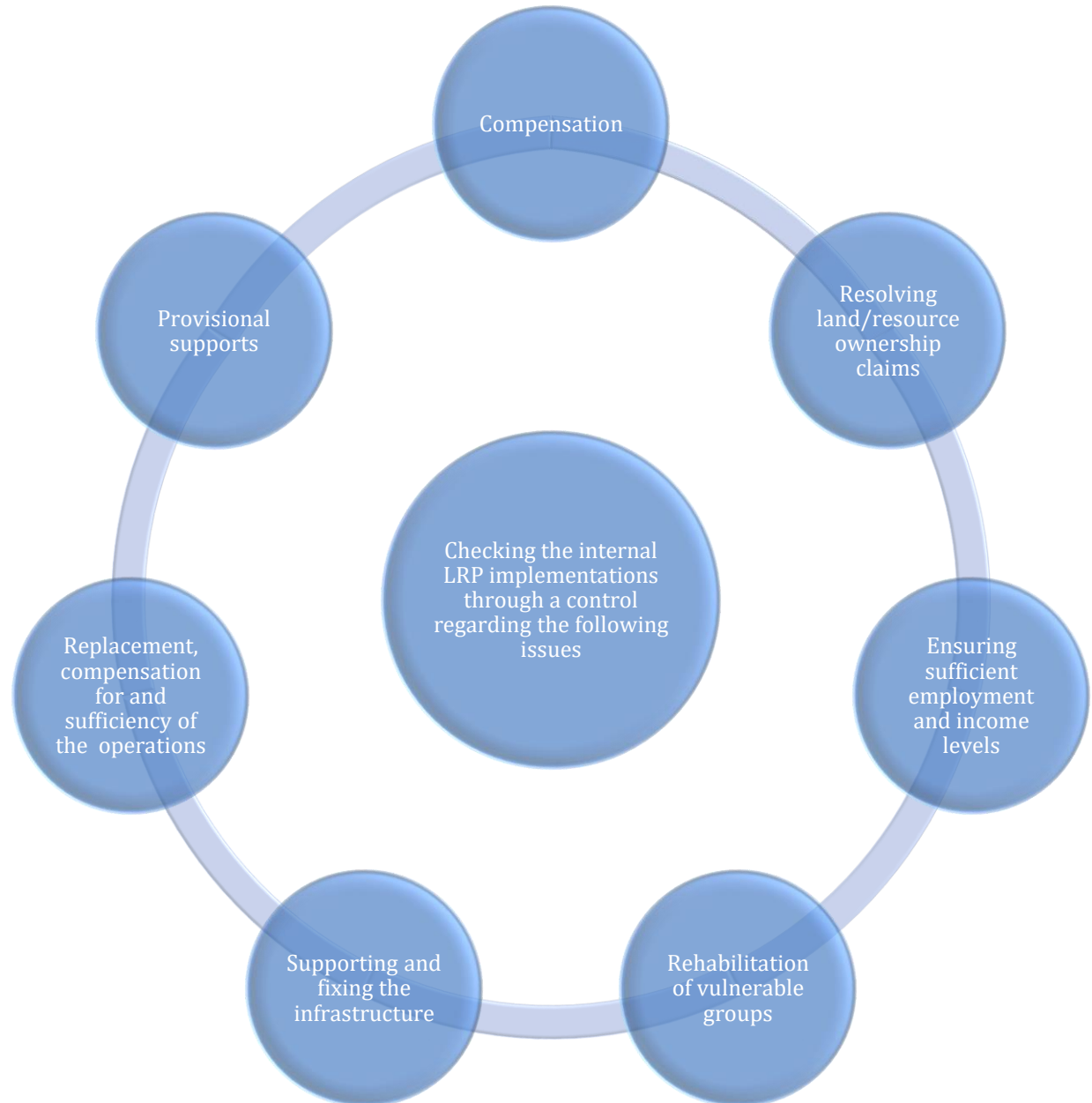
Impact indicators define long term changes in behaviors and attitudes; and measurable changes in living standards. Impact indicators aim to indicate whether GCP's livelihood restoration activities are effective in sustaining and improving social and economic conditions of the PAPs.

Performance Monitoring is an internal management function allowing Acacia Mining Operations to measure physical progress in accordance with the steps stated in LRP. Among Acacia Mining Operations LRP Monitoring & Assessment performance steps are:

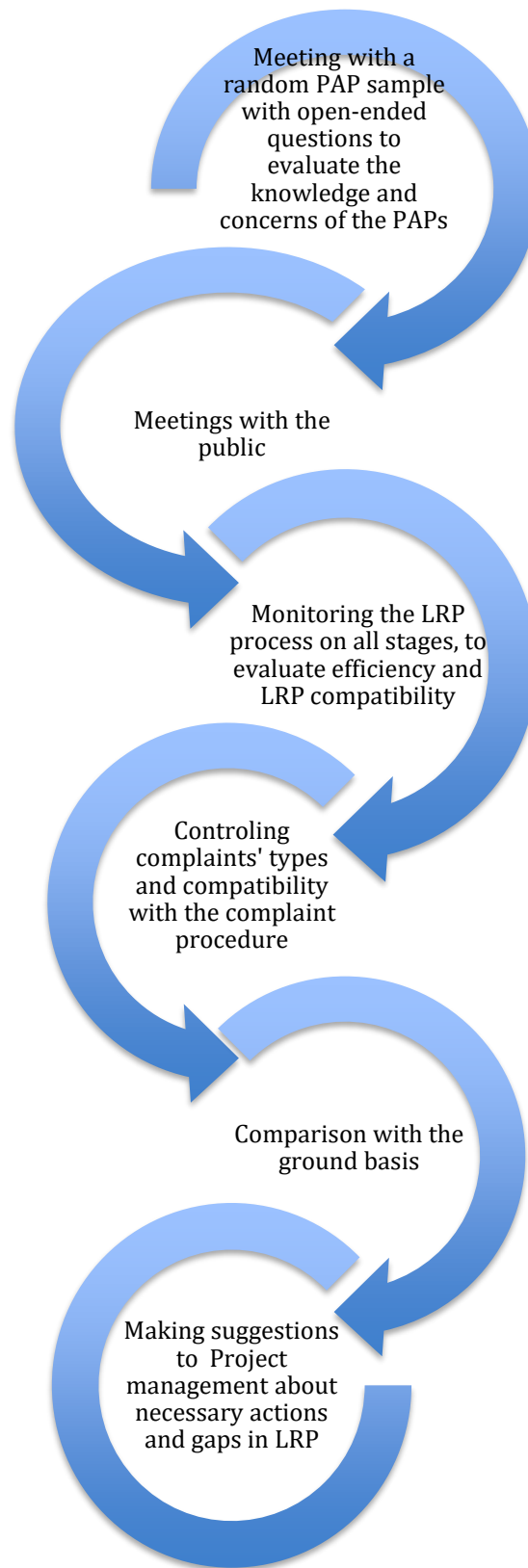
- Checking that the Project's land acquisition and price rights are successfully provided to all related persons on time;
- Prioritizing project affected households in employment (Acacia Mining Operations has a Local Employment Directive);
- Treating the project affected communities fairly;
- Planning the implementation of measures related to improving living standards; Following the implementation activities;
- Providing the necessary support for resolving issues and disputes, and eliminating them with appropriate plans;
- Following the complaints in line with the affected population's requests and registering the grievance forms;
- LRP recording the corrections and sharing them with the affected communities;
- Regularly requesting feedback;
- Buying the affected stocks and
- Annually sharing the results with external experts and other related stakeholders.

LRP performance monitoring is planned to be integrated with the general project management of Acacia Mining Operations in order to twin LRP activities with all project implementation activities.

Figure 7.1. LRP Monitoring and Assessment Framework



After verification and field controls;



Impact Monitoring (External Monitoring) - Impact monitoring measures how effectively LRP and the implementation thereof meets the affected population's needs. Impact monitoring will be provided first with internal dynamics of Acacia Mining Operations. External monitoring will be handled by external monitoring experts. The effects of LRP will be monitored in line with basic conditions of the population before resettlement. Impact monitoring will ensure the effectiveness of impact mitigating measures before, during and after the Project; and give feedback to Acacia Mining Operations for potential necessary corrections. Impact monitoring will focus on the impacts of the Project and re-offering works, regarding re-offering livelihoods that were negatively affected by the Project.

An independent external evaluation expert will conduct external monitoring semiannual during construction and during operation. The external expert will:

- Review the Acacia mining internal monitoring, evaluation and reporting procedures, data and information
- Assess the extent of compliance with the LRP and make recommendations where there are shortfalls
- Review grievance records for evidence of significant non-compliance or recurrent poor performance in livelihoods restoration implementation
- Assess technical reports and studies
- Assess adequacy of livelihoods restoration project planning and implementation
- Discuss progress with community relations staff and where appropriate partner agencies to review Livelihood Restoration progress and identify critical issues
- Conduct periodic interviews with PAPs and community members to assess the extent to which PAPs livelihoods have been restored and display increased resilience as a result of the Project
- Prepare a report on its findings, identifying critical issues and making recommendations for corrective action.
- Identify if the project is ready for completion by assessing that PAPs livelihoods have been restored, etc.

To ensure that the Project's income restoration and livelihood restoration works are successful and that the affected population is resettled in desired locations, impact monitoring is planned to continue during and after LRP as well.

Regular dynamic monitoring (to the extent of data analysis on a household basis) will help Acacia Mining Operations detect the problems (such as reduced crop productivity, reduced household income, etc.) in the affected population, be it on a cumulative or household level.

7.2. Monitoring Indicators

Table 6.1. Framework and Indicators of Monitoring

Acacia Mining Operations LRP Monitoring Framework				
Indicator of Monitoring	Measures	Frequency of Monitoring	Period	Monitoring responsibility
LRP Performance	Number of signed land purchase agreements-progress and completed percentage	Semi-annual	Completing land acquisition regarding LRP Completion Audit	Acacia Mining Operations Field Representatives; Social Environment Group (SEG); Internal and/or External Consultants
	Land acquisition payments to the owners - number and completed percentage			
	Acquired lands for construction - total in decare			
	Assets contracted with willing buyer-seller regulations, percentage in the whole			
	Assets transferred to EMRA for expropriation, percentage in the whole			
	Number and type of received/handled complaints and court cases			
	Public meeting activities, number of meetings and participating PAPs			
Restoring Living Standards	Job opportunities offered to PAPs by Acacia Mining Operations, Contractors and Subcontractors	Starts in February 2017, to be prepared every 6 months	Starting land acquisition regarding LRP Construction Completion	Acacia Mining Operations Field Representatives Internal and/or External consultants
	Paying the land owners - amount, number, completed percentage			
	Legally agreed prices and timely paid costs			
	Compensated/restored other losses of the right owners (roads, irrigation systems, drain pipes) - types and			

Acacia Mining Operations LRP Monitoring Framework				
	number of other costs, percentage in the whole Handled special need types - number and quality of support/assistance Monitoring the implementation of income-generating activities defined in feasibility works Project-acquired public owned lands, size in decare and percentage in the whole Regulations made with the related institutions for costs/replacements of affected roads and other infrastructures, cost percentage in the related category			
Restoring Incomes	Changes in income and expense models before and after the Project - income increase amount or percentage Changes in household incomes from outside-agriculture activities, percentage in total household incomes Acquired new immovable assets, invested cost percentage Current and used credit sufficiency, investment percentage Changes in savings, household income percentage Incomes from Project related activities, household income percentage	Based on qualitative works, starting in 2016 to be carried out every 6 months, to be terminated in 2019 (after the construction is finished) with the final base-case update, and to be annual for 2 more years.	Completing the land acquisition regarding LRP Completion Audit	Acacia Mining Operations Field Representatives and SEG External Consultants Independent Experts (by the claimants)
Livelihood restoration	The training, number and percentage of PAPs that got on-the-job or other types of training Changes in agricultural technologies, equipment and machinery investment percentage in the form of	Based on qualitative works, starting in 2016 to be carried out	Completing the land acquisition regarding LRP Completion Audit	External Consultants Independent Experts (by the claimants)

Acacia Mining Operations LRP Monitoring Framework				
	percentage of received cost	every 6 months, to be terminated in 2019 (after the construction is finished) with the final base-case update, and to be annual for 2 more years.		
	Changes specific to gardening outcomes per household			
	Changes specific to agricultural outcomes per household			
	Changes specific to livestock outcomes per household			
Community Satisfaction	PAPs' reaction to the land acquisition process	Permanent		Acacia Mining Operations Field Representatives and SEG Internal and/or External consultants
	PAPs' reaction to the restoration of their living standards			
	Attitude of other stakeholders towards above-mentioned issues			
	Future visions according to the perceptions of PAPs and other stakeholders			
Public Meetings and Complaints	Approach of PAPs to land acquisition and cost processes - observation and feedback collected with direct communication	Permanent		Acacia Mining Operations Field Representatives and SEG Internal and/or External consultants
	Complaint types - number and outcomes of received and handled complaints			
	PAP Information meetings for general project stages and satisfaction level of PAPs after these meetings			

Chapter 8 Project Budget and Implementation

This chapter covers the budget foreseen by the Project and implementation calendar to be used for LRP.

Budget

LRP Budget	Currently spent	Allocated Budget for Planned LRP	Actual used budget
A. Preparing LRP, consulting services: USD 49,000.00			
B. Land acquisition Budget			
<i>B.1 Acquisition of private properties within the scope of LRP</i>	USD 1,913,578.69	USD 2,298,525.00	0
<i>Sepeçioğlu area land acquisition</i>		<i>USD 1,935,600.00</i>	0
<i>WSF area land acquisition</i>		<i>USD 362,925.00</i>	0
<i>B.2. LRP Budget (LRP budget also includes extra payments necessary for the full replacement cost.)</i>		Extra payments are included in the Land acquisition budget. No separate budget defined.	
C. LRP works / Expenses planned for LRP (including community development program)	USD 103,792.22 (spent between February 2015-March 2017)	USD 324,500.00 (planned to be updated annually)	0
D. LRP Monitoring and assessment works		USD 24,000.00	0
E. Management expenses		USD 49,580.00	0
F. Unforeseen Expenses		USD 459,000.00	0
Total	USD 2,017,370.91	USD 3,155,605.00	

LRP Implementation Calendar

	Estimated Time of Termination
Doing inventory and value assessment work for all lands and immovables	2021
Land and immovable asset acquisition	2020-2021
Preparing LRP	Ongoing-2021

Preparing livelihood-increasing actions (community development program, etc.) under LRP, for households whose livelihoods were affected	Permanent
LRP's consultation with stakeholders	Permanent
Preparing LRP monitoring and assessment works	Permanent
Monitoring and evaluation	Permanent
Final impact assessment work (closure)	2030

Annexes

Annex 1 Energy Transmission Line LRP

Annex 2 Land Acquisition Procedure

ANNEX 3 Annotation for Impact of WSF Site on the Graveyard

Annex 4A-B Outcomes of the Workshop

ANNEX 5 Methodology

Annex 6 Field Photographs