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## 6. Stakeholder Consultation and Engagement

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### 6.1 Introduction

This chapter describes OMAS's approach to stakeholder engagement, its purpose and the regulatory context in which it occurs. It provides information about engagement activities undertaken to date and those that are planned for the future. This chapter also summarises the comments that have been made by stakeholders to date and how these comments are addressed within the relevant chapters of this ESIA Report.

Stakeholder engagement (including dialogue, consultation and the disclosure of information) is a key element of Project planning, development and implementation. Effective stakeholder engagement assists good design, builds relationships with local communities, and reduces the potential for delays through the early identification of risks, issues and opportunities. OMAS is committed to a transparent and respectful dialogue with stakeholders throughout the life of the Project.

### 6.2 Objectives

The objectives of the Project's approach to stakeholder engagement are to:

- Ensure the stakeholder engagement practices meet Turkish legal requirements and international good practice;
- Identify key stakeholders that are affected, and/or able to influence the Project and its activities;
- Identify the most effective tools and methods to disseminate Project information, and to ensure regular, accessible, transparent and appropriate consultation;
- Support OMAS in building mutually respectful, mutually-beneficial and lasting relationships with stakeholders;
- Provide a mechanism that enables stakeholder comments and complaints to be received by OMAS and responded to in a transparent manner.

### 6.3 Requirements and Policy Requirements for Stakeholder Engagement

#### 6.3.1 National Requirements

There are no specific requirements under Turkish law for ongoing stakeholder engagement during construction and operations. Under the *Environmental Impact Assessment (EIA) Regulation (Official Gazette, 17 July 2008, No 26939)*, a limited public disclosure process is defined related to the EIA process.

Public consultation is a mandatory part of the EIA process, led by the Ministry of Environment and Urban Planning (MoEUP), involving four elements:

- Application – this includes the submission of the EIA Application File (EIAAF), review by the MoEUP and establishment of the Review and Evaluation Committee (REC);
- Scoping – following the review period, the EIAAF is disclosed to the public and the MoEUP holds a Public Participation meeting/s where information about the proposed Project and the EIA process, including a preliminary assessment of potential environmental and social impacts, is presented to the public, who are invited to ask questions and provide comments. A Scope and Special Format Determination (SSFD) meeting is held, attended by the REC, and the contents of the EIA Report are discussed including stakeholder feedback from the Public Participation meeting. The Special Format (i.e. the EIA Report table of contents) is determined;

- Draft EIA – submission of the draft EIA Report to the MoEUP for review, followed by the commencement of the Review and Evaluation process. The draft EIA Report is disclosed to the public (through announcements on the MoEUP website) and stakeholders have the opportunity to provide comments within a timeframe announced by the MoEUP and comments received from stakeholders are considered by the MoEUP and REC. A Review and Evaluation meeting is held with the MoEUP and REC to provide feedback for consideration in the final EIA Report;
- Final EIA – comments received during the Draft EIA Stage are reflected in the EIA Report as necessary. The final EIA Report is then submitted to the MoEUP, who publish the report online for a period of ten business days, after which an ‘EIA Positive’ or ‘EIA Negative’ decision is made by the MoEUP.

### **6.3.2 Standards and Guidelines for Financing**

In addition to the EIA requirements described above, the Project is being developed in accordance with EBRD Environmental and Social Policy and Performance Requirements (PR). PR10, Information Disclosure and Stakeholder Engagement, sets out guidance for stakeholder engagement as part of Project development.

PR10 recognises the importance of open and transparent engagement between Project sponsors and its workers, local communities directly affected by the Project and, where appropriate, other stakeholders as an essential element of good international practice (GIP) and corporate citizenship.

PR10 identifies stakeholder engagement as an ongoing process which involves:

- public disclosure of appropriate information;
- meaningful consultation with stakeholders;
- an effective procedure or mechanism by which people can make comments or raise grievances.

EBRD recognise that the process of stakeholder engagement should begin at the earliest stage of Project planning and continue throughout the life of the Project. It is identified as an integral part of the assessment, management and monitoring of environmental and social impacts and issues of the Project.

The key objectives of PR10 are to:

- outline a systematic approach to stakeholder engagement that will help Project sponsors build and maintain a constructive relationship with their stakeholders, in particular the directly affected communities;
- promote improved environmental and social performance through effective engagement with the Project’s stakeholders;
- promote and provide means for adequate engagement with affected communities throughout the Project cycle on issues that could potentially affect them and to ensure that meaningful environmental and social information is disclosed to the Project’s stakeholders;
- ensure that grievances from affected communities and other stakeholders are responded to and managed appropriately.

### **6.4 Stakeholder Identification**

Stakeholder identification and engagement commenced in and around Öksüt with Stratex in 2007. OMAS has been involved with the stakeholder engagement process since the 2009 Joint Venture, and took over full management in early 2013 during geological exploration activities to introduce the Project to local communities. Engagement continued through 2013-14 and in 2014-2015, OMAS undertook an extensive stakeholder identification and engagement process as part of the development of a socio-economic baseline study for settlements within the Project Area. Additional stakeholder identification activities were undertaken along the powerline route in early 2016.

## 6.4.1 Methodology

Stakeholders have been identified based on proximity to Project features, potential degree of impact and interest in the Project (particularly in relation to government authorities and other public and private-sector organisations).

OMAS has actively engaged stakeholders since 2013 and has developed a detailed register of all stakeholder engagement activities undertaken. This register is included as an *Annex U*.

As an extension of the ongoing stakeholder engagement activities undertaken by OMAS, a range of specific engagements have been undertaken to develop socio-economic baseline information for the Turkish EIA and for the ESIA. This has included household surveys, focus group discussions and key informant interviews.

As part of the development of detailed information of local neighbourhoods, household surveys were conducted in December 2014 in the two neighbourhoods closest to the mine site, Öksüt and Zile. Based on population and household figures provided by local government, 50% of the households in each settlement were interviewed – 89 in Öksüt and 58 in Zile. The surveys were conducted in December 2014. Results were blindly selected and households not present were replaced by the neighboring household. Efforts concentrated only on permanent residents. Lists noted permanent and summer residents. No summer residents were surveyed.

Qualitative data collection took place in all settlements in the study area, including Develi. The majority of the key informant interviews were conducted in December 2014. Supplementary information has been collected in January and February 2016.

In total, there were 23 key informant interviews with government representatives, neighborhood *muhtars*. Interview formats follow a semi-structured format with some specific questions, but with the freedom to ask follow on questions for topics deemed most relevant by the interviewer.

Fifteen focus groups were held. A total of at least 96 people participated in these events and almost all settlements included separate meetings with men and women to better understand gender dynamics and perceptions across all baseline topics. Similar to one-on-one interviews, the format was based on a set of standard questions, but allowed for more in-depth conversations on topics deemed most appropriate for the group

## 6.4.2 Stakeholder Categorisation

OMAS defines communities and stakeholders as two distinct groups:

- The term **community** is generally applied to the inhabitants of immediate and surrounding areas that may be affected in some way by a company's activities; these effects may be economic and social as well as environmental in nature. Stakeholders are those who have an interest in a particular decision, either as individuals or representatives of a group including people who influence a decision or can influence it, as well as those affected by it.
- **Stakeholders** include non-governmental organisations, governments, shareholders and employees as well as non-affected community members.

## 6.4.3 Communities of Interest

The communities of interest to OMAS comprise:

- Those villages (neighbourhoods) within the immediate vicinity of the mine licence area and within the Project Area;
  - Öksüt
  - Zile
  - Gazi

- Sarıca
- Tombak
- Epçe
- Gömedi
- Yazıbaşı
- Çayırözü
- Soysallı
- Sindelhöyük
- The Quarter of Yukarı Develi
- The regional town of Develi
- Vulnerable members of affected communities
- Employees and contractors of OMAS
- Shepherds and livestock graziers who use land within the Project Area.

#### **6.4.4 Stakeholders**

Key stakeholders with an interest in OMAS and the Öksüt Project include:

- Develi District
  - Develi Governor
  - Develi Municipality
  - Develi Gendarmerie
  - Develi Education Department
  - Develi Chamber of Commerce
  - Develi Public Hospital
  - Develi Department of Health Affairs
  - Develi Public Education Department
  - Develi Electricity Affairs (KCETAS)
  - Develi Land Registry Department
  - Develi Food, Agriculture and Livestock Department
  - Develi Forestry Department
- Kayseri City
  - Kayseri Governor
  - City Directorate of Environment and Urbanization
  - City Directorate of Food, Agriculture and Livestock
  - Kayseri Metropolitan Municipality
  - City Directorate of Health
- Regional
  - Regional Directorate of Hydraulic Works

- Regional Directorate of Forestry
- Regional Directorate of Protection of Cultural Heritage
- National
  - Ministry of Environment and Urban Planning
  - Ministry of Energy and Natural Resources
    - Directorate of Mining Affairs
  - Ministry of Food, Agriculture and Livestock
  - Ministry of Forestry
- Academic institutions
  - Middle East Technical University, Mining Engineering Department
  - Ankara University, Department of Real Estate Development and Management
- Civil society, NGOs and community-based organisations
  - Regional Environmental Centre, Turkey
  - Chamber of Environmental Engineers
  - Nature Conservation Centre
  - BirdLife International
  - Nature Foundation (Doga Dernegi)
  - KAD (Kus Arastirmalari Dernegi- bird research association)
  - Turkish Union of Trade and Chambers and Commodity Exchanges
  - Environment Foundation of Turkey
- Community-based organisations within Develi District
- Regional NGOs within Kayseri Province
  - Middle Anatolia Development Agency
  - Union of Chambers of Turkish Engineers and Architects
  - Kayseri Chamber of Trade
- Business owners and service providers to OMAS
- Business and industry associations
  - Gold Mines Association of Turkey
  - Kayseri Chamber of Commerce
- Media interest groups
  - Çağdaş Develi newspaper
  - Çağrı Newspaper
  - Seyrani Newspaper

#### **6.4.5 Vulnerable People and the Consultation Process**

OMAS has defined vulnerable people as: female-headed householders, child-headed householders, disabled people, uninsured people, illiterate people, and the very poor and rural dwellers without secure access to land. All of these categories, except for child-headed households, are identified in

the study area. Women and vulnerable groups (specifically disabled, elderly and youth) were specifically targeted in consultation and engagement related to the social baseline. These groups will continue to be focused on during ESIA consultation and ongoing engagement by OMAS throughout the life of the mine. When focus group discussions and other community-level engagement is undertaken by OMAS, those identified as vulnerable and marginalised will be specifically targeted to ensure they have equivalent opportunities to participate.

Refugees from Syria are also recognized as vulnerable people but have not been included in ESIA consultations as very few refugees have been identified within Develi District to-date.

## **6.5 Stakeholder Consultation and Engagement To-Date**

### **6.5.1 Early Engagement**

Stratex began stakeholder engagement in and around Öksüt in 2007. The Project has been active in stakeholder engagement since the 2009 Joint Venture, and took over full management in 2013. OMAS commenced engagement with local stakeholders from Q3 2013 and included community leaders from Öksüt, Zile, Tombak, Sarıca, Gazi and Develi and community members from Öksüt, Zile, Tombak, Sarıca and Gazi. Epçe community members and leaders were also included the stakeholder engagement process. In addition, representatives of the Forestry Department, Agriculture Department, Develi Municipality and the Develi Sub-District Governor (and related government offices under the Sub-District Governorship) were also briefed on Project activities.

### **6.5.2 OMAS Engagement**

The current Director of External Affairs and Sustainability and the Community Relations Manager have been in place since 2013. Community Relations staff monitor progress against various performance indicators. Information and data are gathered through regularly scheduled community meetings and suggestion boxes. The community relations team aim to visit every village at least once a week, contacting people through the *muhtar* offices and teahouses. There is an OMAS Public Information Office in Develi town centre which is manned by OMAS community relations and human resources staff.

In 2014, a total of 429 meetings were held by OMAS, 324 of which were held by the community relations team with nearby communities and the stakeholders at Develi district. 504 meetings were held in 2015, including targeted group meetings for vulnerable community members including women, elders and children.

OMAS has also engaged with a range of public authorities including:

- *Muhtars* in all neighbourhoods within the social study area and along the powerline corridor;
- Develi Sub-Governorship;
- Develi Muhtars' Association;
- Develi Municipality;
- Develi Gendarmerie;
- Develi District Management of National Education;
- Develi Health Affairs;
- Develi District Directorate of Food, Agriculture and Livestock;
- Develi Vocational High School;
- Develi State Hospital;
- Develi Land Registry and Cadastral Department;

- Develi Public Education Centre;
- Develi Plain Irrigation Centre;
- Develi Tax Office;
- Develi Chamber of Commerce;
- Kayseri Provincial Management of Health;
- Kayseri Metropolitan Municipality;
- Kayseri State Hydraulic Works;
- Kayseri Regional Directorate of Protection of Cultural Heritage;
- KCETAŞ;
- OR-AN Development Agency.

A register of stakeholder engagement activities is included as *Annex U*.

### **6.5.3 Engagement for the Turkish EIA**

The EIA Application File for the Öksüt Project was submitted to the Ministry of Environment and Urban Planning on July 7, 2014. As part of the EIA process, a Community Participation Meeting was held at the Old Municipal Wedding Hall in Zile on August 7, 2014. Approximately 60 people attended the meeting following announcements in national and local press.

Participants comprised representatives of the Ministry of Environment and Urban Planning, the Provincial Environment and Urban Planning Directorate of the Office of Governor of Kayseri, local business representatives and local residents.

A community relations team has been established by OMAS and an information office has been opened in Develi. A Stakeholder Engagement Plan (OMAS-ESMS-SEP-PLN-001) is in place to ensure that there is regular ongoing engagement with direct and indirect stakeholders, to inform them of Project plans and developments on an ongoing basis and gather any complaints or feedback. A Stakeholder Engagement Register records all OMAS interactions with stakeholders and is provided in an Annex to the Stakeholder Engagement Plan and is provided in *Annex U* of this ESIA.

### **6.5.4 Engagement related to the Epçe Water Supply Wells**

Over thirty consultation meetings were undertaken by OMAS with community members and authorities throughout the water supply study between September 2014 and February 2015; and details are available in *Annex U*. These included twenty-one community consultation and awareness meetings in the Epçe tea house and mosque.

### **6.5.5 Engagement related to the national EIA for the Powerline**

Engagement was undertaken in line with Turkish EIA requirements, including a site visit and meetings with relevant *muhtars* in Çayırözü, Soysalli, Sindelhöyük and Tombak. A public consultation meeting was held in December 2015. In addition, OMAS has undertaken additional assessment and engagement activities in February 2016 to identify potentially affected land owners and land users as part of the development of the Livelihood Restoration Plan.

### **6.5.6 Engagement related to the Access Road**

Approval of the Turkish EIA gave OMAS permission to construct an access road to the mine site. As a result, no additional permitting (or public consultation) was required to comply with Turkish regulatory requirements. However OMAS has undertaken additional engagement activities in relation to the access road.

OMAS has consulted with *muhtars* and pastureland users in Epçe, Yazıbası and Gömedi as part of the design and siting process for the access road. This included informing local residents of a drone survey undertaken in October 2015 and also working with pastureland users in February 2016 to identify suitable road crossing points. In January 2015, OMAS met with the Develi Land Registry and Cadastral Department to request cadastral information for the access road and pipeline route. In May 2015, OMAS met with Develi Gendamerie (Traffic Branch) to discuss the planned access road.

### 6.5.7 Engagement Related to the Social Baseline

As part of the socio-economic baseline survey, and in support of ongoing community engagement, a series of household surveys were undertaken in Öksüt and Zile in December 2014. *Muhtars* in each settlement within the Study Area have been proactively engaged by OMAS as part of the EIA and for the socio-economic impact assessment. For the key villages of Öksüt and Zile, detailed registers of all residents were prepared as the basis for detailed household surveys. Vulnerable and marginalised groups such as the elderly and female-headed households were identified and focus group discussions in all settlements were undertaken for both men and women. Additionally, key informants were consulted on specific issues related to informants' areas of expertise / responsibility to inform the baseline study.

### 6.5.8 Consultation and Engagement for ESIA Scoping

Information and issues raised from the key informant interview and focus group discussions has been used to inform the scope of the ESIA. This comprised:

- 89 household interviews in Öksüt and 58 in Zile, encompassing approximately 50% of households in those villages;
- Female and male focus group discussions in neighbourhoods within the social study area (including Develi);
- Key informant interviews with community representatives (*muhtars*) and other key public officials in all neighbourhoods within the social study area (including Develi).

Due to the Turkish EIA process which was being undertaken in 2015, a separate ESIA scoping exercise was not undertaken as this was considered to run the risk of confusing local stakeholders at a time when the focus of OMAS and regulators was on approval of the Turkish EIA.

### 6.5.9 Summary of Issues Raised by Stakeholders

A range of issues have been raised by Communities of Interest and other Stakeholders. The key issues are summarized in Table 6-1 and Table 6-2 below.

**Table 6-1: Issues Raised During Early Engagement**

Frequently Asked Questions
Will there be relocation of the villages due to mine operation?
What are the possible effects of cyanide to our life and livelihood?
What are the main environmental precautions to protect the water sources and crops from dust, and the chemicals?
What are the main protection measurements for the drinking and irrigation water which is newly came to the villages from Zamanti Tunnel?
From which sources will you supply the water for the mine construction and the operation?
Will you use the village roads to access the mine site in the future?
What will be the benefits of the mine for the locals? Will there be employment opportunity for the locals?

**Frequently Asked Questions**

What will be the strategy of the company regarding access to the pasture lands?

**Table 6-2: Issues Raised During Baseline Engagement**

**Frequently Asked Questions**

When the construction and operation works will start?

How will the company manage the local employment process?

What are the possible effects of cyanide to the community health, water sources, soil, and the environment?  
What are the precautions for cyanide usage?

Where the mine road will be constructed?

How the company will manage the mine wastes?

Engagement and feedback from stakeholders was used to inform the scope of both the EIA and the ESIA. In particular, stakeholder feedback was used in relation to:

- The design and scope of groundwater monitoring and the modelling of the migration of leachate from mining operations;
- The design and scope of groundwater monitoring and the modelling of aquifer recharge from the water abstraction wells near to Epçe;
- The design and scope of air quality monitoring and dispersion modelling;
- The minimisation of impacts to pastureland by reducing the fenced area within the EIA Permitted Area to the minimum possible.

**6.6 Planned Activities - ESIA Disclosure and Consultation**

This phase of engagement focuses on disclosing and consulting on the results of the ESIA process. Within the overarching ESIA engagement objectives, the specific objectives for the ESIA phase of engagement are to:

- Provide feedback to the stakeholders on the impact assessment and associated management/mitigation measures (disclosure);
- Gather stakeholder input on the initial impact assessment and identified mitigation and enhancement measures (consultation).

During this engagement phase, disclosure and consultation activities will be designed along the following general principles:

- Consultation events and opportunities must be widely and proactively publicised, especially among Project affected parties, at least 1 week prior to any meeting;
- The non-technical summary must be accessible prior to any event to ensure that people are informed of the assessment content and conclusions in advance of the meeting;
- The location and timing of any meeting will be designed to maximise accessibility to Project affected stakeholders;
- Information presented will be clear and non-technical, and will be presented in the local language understood by those in the communities;
- Facilitation will be provided to ensure that stakeholders are able to raise their concerns;
- Issues raised are answered at the meeting or actively followed up.

Anyone can comment on the draft ESIA during the disclosure period. Feedback forms will accompany all the disclosure documentation.

Further information about specific consultation and disclosure activities related to the ESIA is set out in Section 10.3 of the OMAS Stakeholder Engagement Plan.

## **6.6.1 Tools & Methods for Information Disclosure**

OMAS will develop disclosure materials that are clear, consistent and provided in a timely manner to local communities and other stakeholders. Prior to any disclosure, OMAS will conduct pre-disclosure planning to define a process for information disclosure that ensures that all key groups within Communities of Interest are given the opportunity to receive and comment on Project information.

### **Internet/Website**

OMAS will update its website<sup>1</sup> with relevant Project information in Turkish language as a minimum. The ESIA will be made available on the website as will contact details for OMAS community relations staff.

### **Information Sheets**

Information sheets on key Project issues and OMAS' approaches to minimise, mitigate and manage will be prepared and made available on the OMAS website, in the representative office in Develi and copies will be provided to local village *muhtars* and made available in local village tea houses.

### **Public Media**

As appropriate relevant Project information will also be provided to public media. This will particularly be undertaken during ESIA consultation and construction, and will also occur if any major changes to the Project are envisaged which may impact local communities or land uses.

### **Responding to Local People**

In addition to the Complaints and Grievance Procedure implemented by OMAS for specific issues, OMAS will respond to comments and questions from local residents in a full and timely manner.

## **6.6.2 Primary Consultation and Disclosure Methods, Tools and Activities**

A variety of community stakeholder engagement tools and methodologies have been used to ensure effective consultation. As part of development of the Stakeholder Engagement Plan (SEP), the various methods of stakeholder consultation used by OMAS were analysed to determine their suitability for reaching different stakeholder groups.

OMAS has developed a forward-looking Action Plan for consultation (i.e. for the construction period and through to operations and eventual closure).

OMAS will continue to periodically evaluate the effectiveness of its engagement processes based on feedback from community members and stakeholders.

The primary methods of engagement with communities and stakeholder groups are:

### **Methods applied with Communities of Interest:**

- Household Visits/Consultation
- Participation in Community Development Programmes
- Pastureland User Groups
- Focus Group Discussions and Workshops

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<sup>1</sup> oksutmadencilik.com.tr

- Local Community Meetings
- Surveys and Interviews
- Public Events, Education & Outreach
- Site Tours
- Newsletter

**Methods applied with Stakeholder Groups:**

- Meetings and Sessions with Turkish governmental authorities
- Site tours
- Meetings with NGOs and interest groups
- Media
- Info sheets, newsletters and magazine
- OMAS Website
- Annual Reports
- Corporate Responsibility, GRI, Conflict-Free Gold Standard and EITI Reporting

**Table 6-3: Engagement and Disclosure Methods for Different Stakeholder Groups**

Stakeholder Group	Key engagement and disclosure methods
Economically displaced people	Individual and group meetings with Pasture Users, surveys, focus groups meetings, workshops, and livelihood improvement training programs
Local communities	Tea house meetings, surveys, focus groups and workshops, open houses, OMAS branch offices/open houses, Open Days, other local working groups
Vulnerable Groups	Household visits, individual meetings, specific invitation to focus groups and workshops, local disclosure materials
Local/Regional Authorities	Formal meetings, individual meetings, focus groups and workshops, OMAS site visits, local disclosure materials
Local Businesses	Individual discussions, questionnaires, focus groups and workshops, supplier development programme
Local CBOs/NGOs	Open Days, OMAS information office, individual meetings, focus groups and workshops, community development programmes (as partners)
Project Employees	OMAS site office and internal communications, website, individual discussions
General Public	Newspapers, radio, public meetings, website
Businesses and Industry Associations	Kayseri Chamber of Commerce, industry events, individual meetings, supplier development programme
National/International NGOs	Site tours, individual meetings, website, workshops, community development programmes (as partners)
Financial Institutions	Individual meetings, website, workshops
Media	Interviews, press releases/newspaper articles, website

## **6.7 Future Stakeholder Engagement and Consultation**

A SEP has been developed for the planning, construction, operations and closure phases of the Project. Future stakeholder engagement will be undertaken in line with the SEP which will be reviewed regularly, at least every six months during construction and annually during operations, to ensure that it remains valid and meets the needs of OMAS, local communities and other relevant stakeholders.

## **6.8 Management of Complaints and Grievances**

A Grievance Procedure provides a mechanism for communities and affected parties to raise complaints and grievances and allows the Project to respond to and resolve the issues in an appropriate manner. OMAS has a Grievance Management Procedure which was implemented in October 2014, which is aligned with the *UN Guiding Principles on Business and Human Rights* (focusing on the principles to protect, respect and remedy). The mechanism provides an effective, culturally appropriate, accessible and transparent means to remedy grievances.

The Grievance Procedure is included in the Stakeholder Engagement Plan (OMAS-ESMS-SEP-PLN-001) and it applicable to all OMAS activities whether undertaken by OMAS staff or contractors. Requirements for contractors to comply with, and use, the Grievance Procedure are set out in individual contracts.

The process for addressing community complaints is via the process outlined in Figure 6-1<sup>2</sup>.

There have been 12 recorded grievances to date and all grievances were closed by working with the related departments.

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<sup>2</sup> This has been extracted directly from the OMAS Grievance Procedure.

Figure 6-1: OMAS Grievance Management Process

