



Environmental & Social Management System

Livelihood Restoration Framework

Livelihood Restoration Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1

TABLE OF CONTENTS

1	INTRODUCTION	3
1.1	DOCUMENT NUMBER	3
1.2	PURPOSE	3
1.3	APPLICATION	3
1.4	COMMENCEMENT	4
1.5	AUTHORITY AND MANAGEMENT	4
2	SCOPE	4
2.1	SCOPE OF THIS FRAMEWORK	4
2.2	OVERLAPS WITH OTHER MANAGEMENT PLANS	4
3	ROLES AND RESPONSIBILITIES	4
3.1	KEY ROLES AND RESPONSIBILITIES FOR FRAMEWORK IMPLEMENTATION	4
4	PROJECT STANDARDS	5
4.1	APPLICABLE TURKISH NATIONAL STANDARDS	5
4.2	APPLICABLE INTERNATIONAL STANDARDS AND GUIDELINES	6
4.3	APPLICABLE CENTERRA AND OMAS STANDARDS, POLICIES AND PROCEDURES	8
4.4	OTHER INDUSTRY GUIDELINES WITH WHICH OMAS HAS COMMITTED TO COMPLY	8
4.5	SUMMARY OF APPLICABLE PROJECT STANDARDS	8
5	OMAS APPROACH TO LAND ACCESS AND LIVELIHOOD RESTORATION	9
5.1	KEY PRINCIPLES USED BY OMAS	9
5.2	LAND ACCESS AND ACQUISITION REQUIREMENTS	10
5.3	KEY STEPS IN THE OMAS APPROACH TO LIVELIHOOD RESTORATION	10
6	IMPLEMENTATION SCHEDULE	16
6.1	STAKEHOLDER ENGAGEMENT TO DATE	16
6.2	KEY TASKS FOR COMPLETION OF THE LIVELIHOODS RESTORATION PLAN	16
7	MONITORING	17
7.1	PROGRESS MONITORING	17
7.2	EFFECTIVENESS MONITORING	18
8	AUDIT AND REPORTING	20
8.1	EXTERNAL AUDITING	20
8.2	RECORD KEEPING	20
9	DOCUMENT CONTROL	20
Tables		
	Table 1: Key Roles and Responsibilities	5
	Table 2: Project Land Requirements	10
	Table 2: Entitlements Framework	14
	Table 3: Key Performance Indicators	19
Figures		
	Figure 1: Livelihood Restoration Process	11



Livelihood Restoration Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1

1 INTRODUCTION

1.1 Document Number

This document is the Livelihood Framework for the Öksüt Gold Project. The document reference number for this Framework is OMAS-ESMS-LR-PLN-001.

1.2 Purpose

The purpose of this Framework is to:

- define the scope of the Framework and set out applicable management interfaces;
- define roles and responsibilities;
- outline the applicable Project Standards relevant to this Framework;
- define the process and timeframe for the development of a detailed Livelihoods Restoration Plan (LRP);
- set out initial objectives for livelihoods restoration.

The Framework has been prepared to set out the key objectives, requirements and commitments which will be developed further in a more detailed Management Plan and applicable Procedures once additional information has been collected and detailed management actions have been defined. The Management Plan will supersede and replace this Framework.

Objectives

Objectives of this Framework (and subsequent Plan) are to:

- avoid or, when unavoidable, minimise, involuntary resettlement by exploring alternative project designs;
- mitigate adverse social and economic impacts from land acquisition or restrictions on affected persons' use of and access to assets and land 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;
- restore or, where possible, improve the livelihoods and standards of living of project affected persons to pre-project levels.

1.3 Application

The requirements set out in this Livelihoods Restoration Framework apply to all OMAS activities throughout the lifecycle of the Öksüt Gold Project, including those carried out by contractors, related to the construction and operation of project features within the EIA Permitted Area, along the route of the powerline and along the route of the Access road and water pipeline.

This Framework is based on the OMAS Environmental & Social Management System Framework (OMAS-ESMS-001), which is owned by the OMAS General Manager. Any subsequent changes to the OMAS Environmental & Social Management System (ESMS) Framework may result in changes to this Framework.

This Framework will be updated and replaced by a detailed Livelihoods Restoration Plan prior to the commencement of construction activities.

Livelihood Restoration Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1

1.4 Commencement

This Framework applies from 1 April 2016.

1.5 Authority and Management

The OMAS General Manager approved this Framework on 31 March 2016.

This Framework is owned by the OMAS Director, External Affairs and Sustainability. Any requests for changes to this Framework must be addressed to the owner of this Framework and will be subject to appropriate review and approval processes as outlined in the Management of Change (MOC) procedure set out in the ESMS Framework.

2 SCOPE

2.1 Scope of this Framework

This Framework covers the process for livelihood restoration for those displaced from public pastureland or other land use by the Öksüt Gold Project. All land acquisition has either comprised State-owned land or has been the subject of willing-seller willing-buyer negotiations.

2.2 Overlaps with other Management Plans

This Framework is part of the overall suite of Management Plans developed for the OMAS Project and as described in the ESMS Framework.

This Framework has overlaps and cross-linkages to a number of other Management Plans which have community health safety and security implications, including:

- the Water Resources Management Plan (OMAS-ESMS-WR-PLN-0011), particularly in relation to the protection of potable drinking water supplies;
- the Community Health Safety and Security Management Plan (OMAS-ESMS-CHSS-PLN-001), particularly in relation to protection of local communities from physical hazards;
- the Community Development Framework (OMAS-ESMS-CD-PLN-001), particularly in relation to minimising local social and economic dislocation related to the Project;
- The Stakeholder Engagement Plan (OMAS-ESMS-SEP-PLN-001), particularly in relation to communicating and engaging with stakeholders in a coordinated manner;
- The Air Emissions Management Plan (OMAS-ESMS-AE-PLN-001), particularly in relation to potential damage to crops from dust related to construction.

3 ROLES AND RESPONSIBILITIES

3.1 Key Roles and Responsibilities for Framework Implementation

Principal roles and responsibilities for the implementation of this Framework are outlined below.

Livelihood Restoration Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1

Table 1: Key Roles and Responsibilities

Role	Responsibilities
OMAS General Manager	<ul style="list-style-type: none"> Approval of this Framework and resources required for implementation.
OMAS Director External Relations & Sustainability	<ul style="list-style-type: none"> Ensuring compliance with the Project Standards and other requirements set out in this Framework. Overall responsibility for Framework scope and implementation. Development, monitoring and revision of this Framework.
OMAS Land Acquisition/Permits Coordinator	<ul style="list-style-type: none"> Coordination with construction contractors to ensure OMAS requirements are met. Ensuring that all regulatory requirements related to land acquisition are met. Coordination with TEIAS and EPC Contractor to ensure permanent and temporary land acquisition for power line and access road is undertaken in line with the principals of this Framework and EBRD PR5.
OMAS Community Relations Manager	<ul style="list-style-type: none"> Timely implementation of this Framework, including coordination with implementing organisations and other stakeholders.

4 PROJECT STANDARDS

Applicable Standards must be complied with for all Project activities (the “Project Standards”). Project Standards comprise:

- applicable Turkish Standards;
- Turkish EIA requirements;
- other commitments to and requirements of Turkish Government authorities;
- applicable international standards and guidelines;
- applicable Centerra and OMAS standards, policies and procedures;
- other industry guidelines with which OMAS has committed to comply.

4.1 Applicable Turkish National Standards

The main land ownership regulation in Turkey is the Land Registry Law No. 2644, amended by Law No. 6302, which entered into force on 18 May 2012. Land registration in Turkey is based on the Cadastral Law No. 3402. The Cadastral Law also defines the process for the identification of land owners without registered title deeds or where there is confusion over land ownership.

The Expropriation Law No. 2942 sets out the requirements for the expropriation of privately-owned property.

This Law sets the procedures to be followed during land acquisition:

Livelihood Restoration Framework

Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1
-------------------------------	--	-----------

- the expropriation of immovable (if and when it is required for public interest) owned by real persons or legal identities subject to private law;
- the calculation of the expropriation fee;
- registration of the immovable asset and its appurtenances in the name of the expropriation administration;
- reclamation of the unused immovable assets;
- mutual rights and obligations as well as the procedures and methods for the settlement of;
- the conflicts pertaining to them.

The use of state-owned lands (pastureland, forestry land, treasury land) by citizens is rule-bound. Citizens can rent pastureland after receiving the required permissions from the relevant Pastureland Commission which is a sub-unit of the Ministry of Food, Agriculture and Livestock. Citizens can also rent treasury lands for agricultural, commercial, sports and social activities.

The use of forestry and pastureland is regulated by the Forest Law No.6831 and the Pasture Law No. 4342. Registration of the ownership or easement rights will be carried out in accordance with the Cadastral Law No. 3402, and Land Registry Code (Official Gazette No. 28738).

Livelihood restoration for physical or economic displacement is not a requirement of Turkish Law.¹

4.2 Applicable International Standards and Guidelines

OMAS is committed to ensuring that its approach not only complies with Turkish law but also meets good international practice, and will ensure livelihood restoration is undertaken in line with the EBRD's Performance Requirement 5: *Land Acquisition, Involuntary Resettlement and Economic Displacement*.

Key Objectives

Key objectives of EBRD PR5 relating to economic displacement are to:

- Mitigate adverse social and economic impacts from land acquisition or restrictions on affected persons' use of and access to assets and land by:
 - Providing compensation for loss of assets at replacement cost;
 - Ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation and the informed participation of those affected.
- Restore or, where possible, improve the livelihoods and standards of living of displaced persons to pre-displacement levels.

Preparation of a Livelihood Restoration Plan

PR5 (para 22) provides the following guidance for the development of a Livelihood Restoration Framework (and subsequent Plan):

A Resettlement and/or Livelihood Restoration Framework will be developed where the exact nature or magnitude of the land acquisition or restrictions on land use related to a project with potential to cause physical and/or economic displacement is unknown due to the project development stage. This framework

¹ Environmental and Social Requirements: EBRD Standards and the Turkish Regulatory Framework, Dr Ebru Yildiz (November 2014)

Livelihood Restoration Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1

will outline the general principles, procedures and entitlement framework consistent with this PR. Once the individual project components are defined and the required information becomes available, the framework will serve as a basis for the development of a detailed Resettlement Action Plan (RAP) or Livelihood Restoration Plan (LRP) in accordance with [PR5].

In the case of the Öksüt Project, work is ongoing to finalise the identification of informal land users who may be affected by removal of, or restrictions on access to, pastureland. Once a final identification of land users has been completed by OMAS, a detailed Livelihood Restoration Plan – based on this Framework – will be prepared.

PR5 requires that a Livelihood 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;
 - 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.

Summary of Key Differences between National Requirements and EBRD Requirements

The main gaps between Turkish Laws and EBRD Policies are summarized below:

- There is no provision regarding the minimization of resettlement/economic displacement in Turkish Laws.
- No legal provisioning to prepare social impact assessment and/or resettlement action or livelihood restoration plan and Stakeholder Engagement Plan under Turkish Law.

Livelihood Restoration Framework

Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1
-------------------------------	--	-----------

- No social studies, surveys and consultations are required prior to land acquisition. Only consultations for negotiated purchase of immovable assets are required by Article 10 of Expropriation Law.
- No clear provision to assess the social/land impacts of the project associated facilities.
- No legal provision to assess the cumulative and transboundary impacts of the Projects
- Only the legal owners can receive monetary compensation (via the expropriation of land and other physical assets).
- Users rights on public and private property are recognized due to recent changes in the Turkish Law.
- Law. Traditional rights are recognized (with the exception of forest lands that do not recognize user rights). Compensation for forest land is paid directly to the relevant government agency
- No legal provisioning is made in the Turkish legislation for compensation of pasture land users
- There is no provisioning in the Turkish Law for livelihood restoration.
- No provision to declare cut-off date
- No legal requirement on identification of vulnerable groups
- No legal provisioning is made to monitor and evaluate the implementation of a RAP or LRP.
- No legal requirement for establishment of a grievance mechanism.

4.3 Applicable Centerra and OMAS Standards, Policies and Procedures

There are no additional applicable Centerra or OMAS standards, policies or procedures related to livelihood restoration.

4.4 Other industry guidelines with which OMAS has committed to comply

None applicable.

4.5 Summary of Applicable Project Standards

OMAS will comply with the more stringent of national standards and applicable lender standards, with the more stringent standards representing the Project Standards.

Applicable Project Standards are summarised below.

Standard	Scope
EBRD PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement	<ul style="list-style-type: none"> • Quantification of impacts, consultation with affected households, development and implementation of livelihood restoration framework and subsequent plan.

Livelihood Restoration Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1

5 OMAS APPROACH TO LAND ACCESS AND LIVELIHOOD RESTORATION

OMAS recognises that it may have land access and livelihoods impact across the Project footprint.

In applying the mitigation hierarchy, OMAS has sought to avoid and minimise displacement as far as practicable during the design phase. This has included fencing the minimum area of land for the minimum duration possible to maintain worker and public safety in the EIA Permitted Area. It is anticipated that displacement will commence in the construction phase, be in place for the duration of operations, and at closure, will be reduced to key Project infrastructure areas (total duration 12 years). The area within the EIA Permitted Area does not include physical settlements; displacement outside this area is temporary and economic.

The following sections outline the key principles used by OMAS and detail the work to date in developing land access and livelihood restoration measures with the impacted group.

5.1 Key Principles Used by OMAS

The key principles guiding land access and livelihood restoration for the Öksüt Project are as follows:

- OMAS will avoid physical resettlement (no physical resettlement is planned as part of the Project design).
- OMAS will seek to minimise the area of land required for permanent features and will minimise the time that construction activities disrupt or interfere with land users access to public land.
- OMAS will use Turkish legal processes for the acquisition of land and the temporary access to land for construction purposes.
- In addition to Turkish legal requirements for land acquisition, OMAS recognizes the need for livelihood restoration for those households that are displaced from access to lands and natural resources as a result of the Project in line with EBRD PR 5. OMAS will compensate the informal users of public lands both at mine site and at project associated facilities including power line although the formal acquisition of land is under the responsibility of state owned TEIAS.
- Wherever possible, acquisition of private lands will be based on a market-based “willing seller-willing buyer” approach, with expropriation used as a last resort when all other options have been attempted.
- Livelihoods will be restored to a same or better level, based on evidence such as household census/inventory/qualitative data, and restoration may include support to continue the same livelihood, an alternative livelihood or a combination.
- Where restrictions on land access lead to impacts at a group or community level, livelihoods support will be provided on a group level, rather than on an individual basis.
- Where restrictions on land access lead to impacts that can be identified and quantified at the level of individual households, impacted households need to have options to choose which approach to livelihood restoration best suits their situation.
- OMAS will take into account any individuals or groups that may be disadvantaged or vulnerable. In particular, OMAS will take necessary actions to ensure that vulnerable groups are not disadvantaged in the land acquisition process, are fully informed and aware of their rights, and are able to benefit equally from the resettlement opportunities and benefits.

Parity between the shepherds in Öksüt, Zile, Yukarı Develi and other affected land users is key. The temporary loss is of access to common pasture and water resources, and as the area used by shepherds is

Livelihood Restoration Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1

short term, communal and seasonal, the livelihood restoration measures are to be common between all displaced users.

- Livelihood restoration is a temporary, transitional activity only to bridge the gap between loss of access to natural resources and being able to meet the same or better livelihood to an agreed level through the same or a different means.
- Long-term livelihoods activities are achieved through other tools, including, for example, the Community Development Framework/Plan.
- Livelihood restoration is not cash compensation, or where a cash payment is made, households may require financial management support in order to invest their compensation to provide for their household's sustainable future.

5.2 Land Access and Acquisition Requirements

All land acquisition will be undertaken in conformance with Turkish property laws and no land will be used until:

- the land has been purchased from the existing owner based on a "willing-buyer willing-seller" transaction;
- the land has been expropriated in accordance with the Expropriation Law and compensation has been paid;
- access to state-owned land has been granted by the Government under applicable legislation;
- Where there are differences between Turkish Expropriation Law and EBRD PR 5 (i.e. users of pasture land, forest land or other state lands who are not entitled for compensation according to Turkish Expropriation Law), OMAS will develop and implement a Livelihood restoration Plan in line with the EBRD PR 5 requirements. In other words, the absence of legal title to land or other assets is not, in itself, a bar to compensation for lost assets or to other resettlement assistance.

Table 2: Project Land Requirements

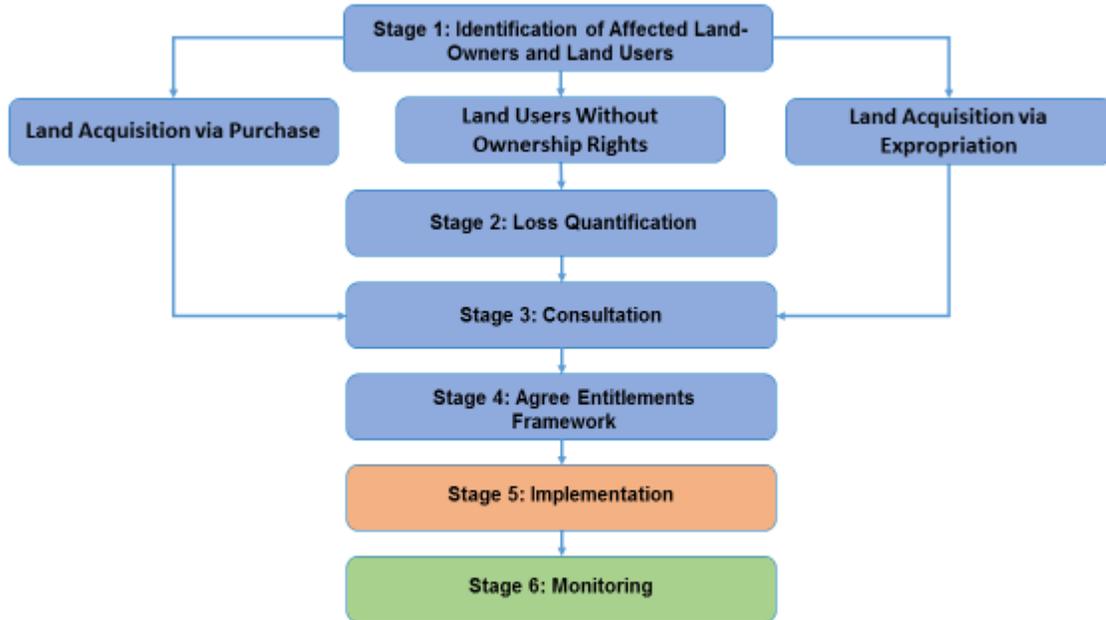
Project Feature	Land Used (ha)	Comments
EIA Permitted Area	1,243.67	The full area permitted for mining activities
Mine Site fenced area	990.20	The actual area that will be inside the security fence and not accessible to the public
Access Road	140	Final road will be 10m wide
Powerline	0.75	75 poles/towers of 10m ² each

5.3 Key Steps in the OMAS Approach to Livelihood Restoration

There are 6 key stages to the OMAS livelihood restoration process. In practice, these steps occur iteratively and at times, in parallel, however the flow chart below provides a summary of each stage, which is described in more detail below. Responsibility for implementation lies with the OMAS Community Relations Department.

Livelihood Restoration Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1

Figure 1: Livelihood Restoration Process



Stage 1: Identification of Affected Land-Owners and Land Users

OMAS identifies all private land owners and potential users of state land through title deed and through surveys in the field. The scale of the displacement impact caused by the Project is dependent on the availability of alternative pasture of equivalent quality, and the inconvenience caused to the shepherds by restricting their access to pastureland. Land of equivalent quality must be of similar agronomic potential, have similar access to infrastructure and services used by the shepherds, including roads and tracks, water sources and structures available for camps. OMAS will assess alternative pastureland by gathering information on:

- Overall pastureland of the area (000ha);
- Surface area within the fence line (000 ha);
- The percentage of pastureland affected by Project activities (temporarily and permanently);
- Field surveys to determine seasonal use of the pastureland within the fence line;
- Water sources (location, size, and characteristics);
- Sheep pens (location, size, and characteristics).

Private land acquisition process for the mine site and water pipeline will consist of the following steps:

- Identification of the addresses of owners;
- Notification of owners of OMAS' intention to purchase the land identified;
- Negotiations with relevant land owners to agree sale price and any access or other conditions;

Livelihood Restoration Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1

- Signing agreement protocols with landowners willing to sell/lease their land;
- Applying court procedures for expropriation where negotiations fail to succeed;
- Completing registration requirements at Title Deed Offices;
- Registering land/asset titles in the name of OMAS;
- Making cash payments in full to consenting owners' bank accounts;
- Obtaining the legal right to use the land

TEIAS will manage the process for Power line in close cooperation with OMAS.

The process for the acquisition of public land for the mine site, access road and water pipeline will consist of the following steps:

- Forest land acquisition involves long term rental (over the life of the mine and into the decommissioning phase as necessary), agreed upon by the Forest Authority and Prime Minister and subsequent transfer of exclusive and unrestricted usage rights to OMAS.
- Treasury Land acquisition involves the payment for such land and subsequent transfer of land rights to OMAS after the Prime Minister's approval.
- Pasture Land acquisition involves approval from Ministry of Agriculture first and then approval by the Prime Minister.
- Village Common Land acquisition involves compensation payments to the village authority with subsequent transfer of land rights to OMAS or in the case of power line to TEIAS.
- Other State Authority Land acquisition involves payment to the relevant state authority with subsequent transfer of land rights to OMAS and to TEIAS for the power line.

Stage 2: Loss/Impact Quantification

Compensation to private owners will be paid based on market price in line with applicable Turkish legislation.

Any private structures, immovable assets or standing crops present on these lands will be compensated to the owners who may be land users (non-documented users) or beneficiaries (unauthorized producers or croppers and grazers).

Payments for trees, vineyards, etc. are made based on a calculation of the expected income from these for the rest of their lives; with the recent changes, the Turkish law allows the payments to be made to both to the owners and users except in forest areas. As per international policies and the recent private sector practice in Turkey, people who have encroached to public and/or private land and planted trees and crops (or built immovable assets) are compensated for these assets (but not for the land).

For pasture land users- in order to ensure fair livelihood restoration assistance is provided to affected shepherds, OMAS will determine the area of land which will be fenced for the duration of the Project (i.e. area of land within EIA Permitted Area, the total area of pastureland within the locality and proportional land take), while also working with the Ministry of Agriculture to determine typical and acceptable stocking density levels for the type of pastureland located within the Project fence line. This information will be used to assess the overall impact on pastureland availability and the carrying capacity of the available pastureland, to inform a reasonable estimate of compensation of loss of access to the area by the land users.

At this point, the following information is known and will require further investigation to confirm these preliminary findings:

- EIA Permitted Area:

Livelihood Restoration Framework

Effective Date:
01.04.2016

Document Number:
OMAS-ESMS-LR-PLN-001

Rev:
1

- Approximately 55 households (including registered and unregistered land users) identified in the area that use the area on a seasonal basis;
- Use of forest lands for mushroom gathering, other plants and the collection of forest wood for personal consumption (not for trading purposes).
- Powerline:
 - Three poles that will disturb active agricultural activities on the footprint;
 - Approximately 10 poles located on either private or public pasture land; however these will not influence long-term agricultural activities.
- Access Road:
 - No identified impact on livelihoods;
 - Further consultation needed to reduce impacts and risks associated with movement of animals across the access road.

Stage 3: Consultation

OMAS will identify shepherds affected by the Project by undertaking an asset survey/census of all identified shepherds in relevant neighbourhoods (principally in Öksüt, Zile and Yukarı Develi). The following activities will be undertaken to ensure all shepherds are consulted during this process:

- Post an announcement in the neighbourhood, which will be photographed as signed by the *muhtar* of the village.
- Hold a meeting with shepherds to discuss:
 - the process - including what will happen after the EIA approval and obtaining other land usage permits;
 - alternative plans once the mine site is fenced;
 - the shepherds' future plans.
- Shepherds will be contacted through the *muhtars* of the relevant neighbourhood (Öksüt, Zile and Yukarı Develi).
- *Muhtars* will be notified of a cut-off date for when the census will be undertaken with all affected shepherds.
- During the survey, options for the livelihood restoration entitlements will be discussed including:
 - relocation of water sources from inside the fence to outside the fence;
 - relocation of animal pens from inside the fence to outside the fence;
 - access to government-run animal husbandry courses or alternatives (as preferred);
 - group-level training;
 - livelihood support (purchase of agricultural materials such as seeds,, tools & equipment);
 - technical and financial support to capacity building activities for Community Based Organisations (CBOs) such as Cattle Breeders Union, Sheep and Goat Breeders Union, Agricultural Development Cooperatives etc.;

Livelihood Restoration Framework

Effective Date:
01.04.2016

Document Number:
OMAS-ESMS-LR-PLN-001

Rev:
1

- measures as identified by shepherds and agreed as reasonable by OMAS (i.e. within a reasonable budget limit identified internally).

Livelihood restoration measures shall be revised after Stage 2. If there is no or limited loss, proposed entitlements will be revised prior to the consultation process.

Stage 4: Agree Entitlements Framework

Through consultation with affected shepherds and key stakeholders (*muhtars* and Government departments), OMAS will agree livelihood restoration assistance which will be applicable to all eligible shepherds. The livelihood restoration assistance will comprise, by agreement, measures that provide:

- compensation for temporary loss of access to land and natural resources;
- compensation for demonstrable loss of structures, assets, wages, rent, or sales earnings;
- other support (such as technical assistance and vocational and skills training), access to available donor/government funds, design and implementation of income generation programmes, capacity building for farmers and their representative organisations).

The entitlements framework will set out the eligibility of different land users to accessing the range of livelihood restoration assistance to be provided and facilitated by OMAS. Eligible land users are identified in the entitlements framework and for community-level impacts, entitlements and activities will also be at a corresponding community level.

Based on consultation undertaken to date, the following entitlements framework will be used. This is based on all property acquisition being undertaken in conformance with Turkish regulatory requirements and entitlements being focused on community-level support for community-level loss of/disruption to access to seasonal upland pastureland. A preliminary Entitlements Framework has been prepared (see below) based on preliminary findings. A detailed Entitlements Matrix will be prepared once all relevant information in land use and livelihoods has been collected. The final Entitlements Matrix will be included in the final Livelihoods Restoration Plan which will be disclosed by OMAS

Table 3: Entitlements Framework

Project Component	Type of Use	Nature of Impact	Action/Entitlements Approach
EIA Permitted Area	Grazing of state-owned pastureland	<p>Permanent loss of customary use pastureland</p> <p>Increased stocking densities on other adjacent pastureland</p> <p>Inter village conflicts due to scarcity of pasture lands</p>	<p>Community-level actions:</p> <ul style="list-style-type: none"> • Provide support to government agricultural development programmes for shepherd households from affected villages <ul style="list-style-type: none"> ○ improving income from animal husbandry and other agricultural products via training, fodder crop production, marketing assistance etc. • Provide access to vocational training from National Employment Agency for households from affected villages <ul style="list-style-type: none"> ○ improving access to alternative income sources (skills development, vocational training), improvement of beekeeping, greenhouse production and other secondary income sources. • Water sources temporarily or permanently unavailable for use within the EIA Permitted Area will be replaced with a suitable replacement outside the EIA Permitted Area

Livelihood Restoration Framework

Effective Date:
01.04.2016

Document Number:
OMAS-ESMS-LR-PLN-001

Rev:
1

Project Component	Type of Use	Nature of Impact	Action/Entitlements Approach
	Private land ownership	Purchase of private land	Land acquired and compensation provided in line with Turkish regulatory requirements
Water Pipeline	Grazing of state-owned pastureland	Temporary loss of grazing land and access across pipeline spread during construction	Covered under "Access Road"
	Private land ownership	Purchase of private land	Private land required has been purchased on a market basis.
Access Road	Grazing of state-owned pastureland	Loss of customary use pastureland under road alignment Disrupted access to pastureland Reduced crop yield or other economic loss due to dust generated by the road	Community-level actions: <ul style="list-style-type: none"> • Provide support to government agricultural development programmes for shepherd households from affected villages <ul style="list-style-type: none"> ○ improving income from animal husbandry and other agricultural products via training • Provide access to training from National Employment Agency for households from affected villages <ul style="list-style-type: none"> ○ improving access to alternative income sources (skills development, vocational training) ○ Users with cropped land will be able to seek compensation for demonstrable and quantified damage to crop yields in line with the OMAS Grievance Procedure and as outlined in the Livelihoods Restoration Framework/Plan
	Pastureland users crossing the access road	Ability to cross road may be disrupted due to need to use designated crossing points or to wait for traffic to pass on the road	<ul style="list-style-type: none"> • Locate crossing points in consultation with shepherds • Provide road safety awareness training to local communities • Monitor impact on water depots and springs • Ongoing engagement with shepherds and <i>muhtars</i> to identify any issues
Powerline	Private land ownership	Purchase of private land for transmission towers	Land acquired (via expropriation) and compensation provided in line with Turkish regulatory requirements
	Informal users of public lands under powerline alignment	No users identified	OMAS to monitor during construction. If informal land users identified, to be assessed in line with the LRF
	Users of cropped land (private and public)	Temporary disturbance due to access tracks and crop damage during construction	Users with cropped land will be eligible for compensation for area in line with Turkish regulatory requirements

Livelihood Restoration Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1

Project Component	Type of Use	Nature of Impact	Action/Entitlements Approach
Project Area	Users of cropped land (private and public)	Reduced crop yield or other economic loss due to dust generated by the mine	Users with cropped land will be able to seek compensation for demonstrable and quantified damage to crop yields in line with the OMAS Grievance Procedure and as outlined in the Livelihoods Restoration Framework/Plan

6 IMPLEMENTATION SCHEDULE

Implementation comprises Stage 5 of the process outlined in Figure 1 above. Upon completion of the stages in the livelihood restoration process, OMAS will develop a detailed implementation schedule, based on the requirements outlined in this Livelihood Restoration Framework and in accordance with the requirements of PR 5.

The objective is to have completed the process outlined in Figure 1 and to have developed a detailed implementation schedule, in consultation with affected shepherds, prior to the commencement of construction activities. This Framework will guide activities until the detailed implementation schedule is in place.

6.1 Stakeholder Engagement to Date

Stakeholder engagement has included discussions with individual potentially impacted households, government organisations (including the Kayseri Provincial Directorate of Food, Agriculture and Livestock, Public Education Centre and District Agriculture Department) and relevant *muhtars*, commencing from 2013 with respect to livelihoods restoration. A summary of engagement to date includes 32 formal and recorded engagement meetings (in the period May 2014 – September 2015), of which:

- 15 were with shepherds, including identifying and locating these stakeholders relative to the EIA Permitted Area;
- 11 meetings with other stakeholders and potential partners including Government agencies and training partners;
- 4 meetings regarding water projects with Zile.

In addition, in January 2016 OMAS commissioned University of Ankara, Department of Real Estate Development and Management to undertake a detailed land use survey, which included identification and consultation with all available land users along the powerline and access road corridors and within and surrounding the EIA Permitted Area.

6.2 Key Tasks for Completion of the Livelihoods Restoration Plan

Key tasks required for completion of the Livelihoods Restoration Plan include the following:

- **Baseline Data:**
 - Confirm the existing baseline by integration and verification of OMAS data and data collected by the University of Ankara;
 - Identify all households that will be affected across all Project features (mine site, access road, water pipeline and powerline).
- **Assessment of Impacts:**
 - Confirm the impacts based on the updated baseline and other qualitative research.

Livelihood Restoration Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1

- Mitigation Planning:
 - Confirm mitigations/entitlements based on the revised impacts.

The Livelihood Restoration Plan will be based on the standard OMAS document structure for management plans (such as this Livelihoods Restoration Framework) and will include the following key elements:

- Regulatory review;
- Land use census and household survey information (household-specific information to be confidential and not disclosed);
- Eligibility criteria and entitlement matrix;
- Procedures for property valuation (if required);
- Consultation plan;
- Implementation plan;
- Monitoring, evaluation and reporting.

7 MONITORING

The monitoring measures that are to be implemented during the construction and operations phase to assess compliance with Project Standards (see ESMS Framework) are described in the section. Monitoring is the responsibility of the Community Relations Manager with the support of OMAS land/permit experts.

In the event that monitoring identifies a non-conformance with Project Standards, it will be investigated and appropriate corrective actions identified.

7.1 Progress Monitoring

Progress to date has included stakeholder engagement, data gathering and analysis, cut-off date establishment and census data gathering.

Water

Consultation with potentially impacted shepherd households in Zile identified the key concern of water availability following fencing of the EIA Permitted Area. The key water sources in the EIA Permitted Area were identified, and OMAS worked with Zile shepherds to identify and implement appropriate and agreed options for replacement water sources for shepherds. Two new water sources were established².

Census

Engagement meetings and census data collection has been undertaken with potentially affected households who use pastureland that will be used by OMAS within the EIA Permitted Area and along the Access Road alignment and the powerline corridor. These were undertaken by OMAS in August 2015 for Zile and supplemented by additional detailed surveys in February 2016 undertaken by the University of Ankara.

Additional data will be gathered to support the completion of the Livelihoods Restoration Plan to ensure that appropriate socio-economic census data is available for all households identified as affected through loss of access to pastureland.

² August 2015

Livelihood Restoration Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1

Pastureland Users Displaced from the EIA Permitted Area

Pastureland users who have been identified as using pastureland within and surrounding the EIA Permitted Area will be subject to periodic consultation to identify and monitor:

- Alternative pastureland areas being used;
- Any issues with over-grazing or conflict with other shepherds over alternative pastureland;
- Whether pastureland use has changed due to replacement of water sources affected by the Project.

Pastureland users will be consulted on at least an annual basis, during the summer grazing season.

Access Road

Pastureland users who access pastureland by crossing the Access Road have been identified and will be subject to periodic consultation to confirm:

- Whether pastureland use has changed as a result of the Access Road;
- Whether pastureland use has changed to the displacement of other pastureland users from the EIA Permitted Area;
- Whether pastureland use has changed due to replacement of water sources affected by the Project.

Pastureland users will be consulted on at least an annual basis, during the summer grazing season.

Powerline

Land owners along the powerline will be subject to monitoring by OMAS during powerline construction to ensure that all requirements of the Turkish expropriation process have been met and that appropriate compensation has been paid to land owners prior to land being used for construction purposes.

After construction has been completed, OMAS will undertake walk-over inspections of the powerline alignment, consult with land owners and consult with *muthars* to identify any potential land use and livelihoods issues associated with the operation of the powerline. Monitoring will be undertaken during the first year after construction and during the summer growing season. If no issues are identified, monitoring for land use and livelihoods issues will then cease.

Dust Impacts on Adjacent Crops

OMAS will install dust gauges at suitable locations surrounding the Project and will take regular photographs during the summer growing season at locations where there is considered to be a risk of real/perceived crop damage due to dust from the Project.

If local land users claim for crop damage, this will be processed via the Grievance Procedure and compensation will be agreed based on the area of crops affected, the estimated impact on yield and the market price for crops. OMAS will also investigate the possible causes for dust emissions that may have caused identified crop impacts and will consider potential mitigation measures to prevent impacts from occurring in the future.

7.2 Effectiveness Monitoring

A monitoring programme will be implemented by OMAS to enable the effectiveness of livelihood restoration measures to be assessed on an on-going basis.

Internal monitoring of planned and budgeted inputs and outputs; monitoring of input and outputs of land acquisition requirements that emerge in the process of construction; and the monitoring of construction

Livelihood Restoration Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1

related compensation to crops and other immovable assets; and the monitoring of grievances will be carried out by OMAS with support of the TEIAS team (for power line) and EPC contractor.

Internal monitoring will focus on measuring progress against the schedule of actions defined in the RAP and include:

- Review and report progress against the LRP to ensure that land acquisition activities progressed as planned and Schedule of activities was implemented;
- Verify that land acquisition and compensation entitlements are delivered and formulate alternative approaches if delivery systems fail;
- Review measures to enhance living standards are being implemented with a specific focus on shepherds;
- Ensure that affected communities are treated equitably; and affected vulnerable groups are prioritised for LRP benefits;
- Verify that measures to compensate all owners as well as users are implemented;
- Seek feedback from affected people;
- Ensure the recruitment of an experienced land/permit expert with extensive familiarity with land acquisition issues in Turkey and who are able to work directly with PAPs and affected communities.

Six-monthly monitoring will be implemented and, after two years, a Completion Audit will be undertaken to assess and confirm the livelihoods of affected shepherds are at least as good as before Project activities commenced.

Key Performance Indicators

The table below summarises the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of proposed mitigation strategies. Key Performance Indicators will be reviewed and updated based on the final Entitlements Matrix and the requirements of the final Livelihoods Restoration Plan.

Table 4: Key Performance Indicators

ID	KPI	Target	Monitoring
L-KPI 01	Agreements with Zile and Yukarı Develi shepherds, and other identified and affected pastureland users, established and implemented	Establishment of Agreements with shepherds from both neighbourhoods, and other identified and affected pastureland users, prior to commencement of operations Implementation of restoration actions as agreed	Six-monthly monitoring and reporting to displaced households and their neighbourhood <i>muhtars</i>
L-KPI 02	Household incomes restored to equal to or higher than pre-project standards.	Household incomes to have increased by at least consumer price inflation (CPI) in the previous year	Annual surveying of economically displaced households; Completion audit two years after commencement of operations
L-KPI 03	Number of shepherds in the affected communities.	All displaced households included in the Livelihoods Restoration Plan	Six-monthly monitoring and reporting to displaced householders and their

Livelihood Restoration Framework		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LR-PLN-001	Rev: 1

ID	KPI	Target	Monitoring
			neighbourhood <i>muhtars</i>
L-KPI 04	Total number of households participating in livelihoods restoration activities	All eligible households participating in livelihoods restoration activities as defined in the Entitlements Matrix.	Six-monthly monitoring and reporting to displaced householders and their neighbourhood <i>muhtars</i>
L-KPI 05	Grievances related to livelihoods restoration resolved within one month	90% resolved within one month	Monthly review of grievance log and stakeholder engagement records

Completion Audit

OMAS will organise for a completion audit to be carried out by an external auditor on the effectiveness of the Livelihoods Restoration Plan. The completion audit will be undertaken 2 years after operations commence to ensure compliance with livelihood restoration objectives and requirements. In the event that monitoring identifies non-conformance with Project Standards, these will be investigated and appropriate corrective actions identified. The key objectives of the completion audit are as follows:

- To verify that all entitlements and commitments described in the Livelihoods Restoration Plan have been delivered;
- To determine whether the Livelihoods Restoration Plan measures have been effective in restoring or enhancing affected peoples' livelihoods;
- To check on any systematic grievances that may have been left outstanding;
- To identify any corrective actions necessary to achieve completion of the Livelihood Restoration Plan commitments.

8 AUDIT AND REPORTING

8.1 External Auditing

Conformance with this Framework (and subsequent Plan) will be subject to periodic assessment as part of the Centerra audit programme and separately by Project Lenders.

8.2 Record Keeping

Records of audits, inspections and incidents will be managed in accordance with OMAS procedures.

9 DOCUMENT CONTROL

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