

TÜMAD

MADENCİLİK SANAYİ VE TİCARET A.Ş.



LIVELIHOOD RESTORATION FRAMEWOK for İVRİNDİ PROJECT

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LIVELIHOOD RESTORATION FRAMEWORK for İVRİNDİ POJECT

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ABBREVIATIONS AND DEFINITIONS

Project(s)	: The İvrindi Gold and Silver Mine and Processing Projects
TÜMAD	: TÜMAD Madencilik San. ve Tic. A.Ş.
DSI	: Devlet Su İşleri – State Hydraulic Works
EBRD	: European Bank for Reconstruction and Development
EIA	: Environmental Impact Assessment
ESMS	: Environmental and Social Management System
ETL	: Energy Transmission Line
IFI	: International Finance Institutions
IMS	: Integrated Management System
PR(s)	: Performance Requirements
TEİAŞ	: Türkiye Elektrik İletim A.Ş.

1. INTRODUCTION

TÜMAD Madencilik San. ve Tic. A.Ş. (TÜMAD) plans to establish the İvrindi Gold and Silver Mine and Processing Project (the İvrindi Project) within the administrative boundaries of Değirmenbaşı and Küçükıllica Villages of the İvrindi District of Province of Balıkesir. The İvrindi Project has started with mobilization.

The project is seeking finance and this document is produced as a part of studies conducted to assess the Environmental and Social Impacts of the Project as per the EBRD Performance Requirements (PRs).

This Document is the Livelihood Restoration Framework that is prepared for TÜMAD Operations. The Integrated Management System (IMS) document registration number for Livelihood Restoration Framework is TMD_IVR_KTI_PLN.002). This framework sets the requirements for the construction and operation phase of the İvrindi Project. At this stage it is still a framework as further information is being collected on the exact nature and magnitude of land acquisition. It will then be developed into a full Livelihood Restoration Plan. Any views and ideas on the information presented in this Framework is very welcome and will be used in the strictest confidence to refine the Plan.

This Framework is based on the Project(s) Environmental & Social Management System Framework (TMD_EYS_PLN.004) of TÜMAD, which is owned by the TÜMAD General Manager. Any subsequent changes to the TÜMAD ESMS may result in the changes to this document.

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 Procedure (TMD_EYS_PRD.006).

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;
- define the Project Standards;
- define the process and timeframe for the development of a detailed Livelihoods Restoration Plan (LRP);
- set out initial objectives for livelihoods restoration activities.

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.

3. SCOPE

The requirements set out in this Livelihood Restoration Framework apply to all Project activities throughout the lifecycle of the 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 Energy Transmission Line (ETL) operated by TEIAS and along the route of the Access road and water pipeline.

3.1. Overlaps with Other Management Plans

This Management Plan is part of the overall suite of Management Plans developed for the TÜMAD Project and as part of ESMS overlaps with the following management plans;

- the Water Resources Management Plans, particularly in relation to the protection of potable drinking water supplies, and protection of irrigation water;
- the Community Health and Safety Security Management Plan, particularly in relation to protection of local communities from physical hazards;
- the Community Development Framework, particularly in relation to minimising local social and economic dislocation related to the Project;
- The Stakeholder Engagement Plans, particularly in relation to communicating and engaging with stakeholders in a coordinated manner;

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- The Air Emissions Management Plan, particularly in relation to potential damage to crops from dust related to construction.
- The Cumulative Impact Assessment Plan which indicate existing and other planned projects in the area that also have livelihood implications.

4. PROJECT STANDARDS

Project(s) Standards are defined by;

- Applicable Turkish Standards;
- Applicable IFI standards and guidelines;
- Applicable TÜMAD standards, Policy and Procedures

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:

- 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 IFI standards and guidelines:

TÜMAD 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.

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

- 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 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 İvrindi 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 TÜMAD, 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.

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- 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.
- 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.

The gaps resulting from these differences are bridged through preparation of a Social Impact Assessment, Social Management Frameworks/Plans including this Framework subsequently to be developed into a full Plan.

5. ROLES AND RESPONSIBILITIES

The primary roles and responsibilities defined for the Project (s) with respect to implementation of this Management Plan are given in Table 1.

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Table 1: Roles and Responsibilities

Role	Responsibility
General Manager	<ul style="list-style-type: none"> Approval of resources necessary for the implementation of this management plan.
IMS & Sustainability Manager	<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.
Land acquisition manager	<ul style="list-style-type: none"> Ensuring development of livelihood framework into a full Livelihood Restoration plan Ensuring the implementation of the Livelihood Restoration Plan Coordinating the monitoring of the effectiveness of the Livelihood Restoration Plan
Community Relations Department Head	<ul style="list-style-type: none"> Timely implementation of this Framework, including coordination with implementing organisations and other stakeholders.
Permits Coordinator	<ul style="list-style-type: none"> Coordination with construction contractors to ensure TÜMAD 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.

6. LAND ACCESS AND LIVELIHOOD RESTORATION PRINCIPLES

TÜMAD has set the following Objectives for the land access and acquisition process;

- 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.

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

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

6.1. Key Principles Used by TÜMAD

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

- TÜMAD will avoid physical resettlement (no physical resettlement is planned as part of the Project design).
- TÜMAD will seek to minimise the area of land required for permanent features and will minimise the time that Project activities disrupt or interfere with land users access to public land.

- TÜMAD will use Turkish legal processes for the acquisition of land and the temporary access to land for construction and operation purposes.
- In addition to Turkish legal requirements for land acquisition, TÜMAD 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. TÜMAD will compensate the loss of *informal users of public lands* both at mine site and at project associated facilities including power line (ETL) where 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.
- TÜMAD will take into account any individuals or groups that may be disadvantaged or vulnerable. In particular, TÜMAD 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.

The temporary loss is of access to common animal grazing areas, herb, hay and other forestry products collection, and water resources, and as the area used is communal 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.

7. LAND ACCESS AND ACQUISITION REQUIREMENTS

All land acquisition has been and will be undertaken in conformance with Turkish property laws, Expropriation 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 and payment has been made;
- 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), TÜMAD 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	836	The full area permitted for mining activities

Project Feature	Land Used (ha)	Comments
Mine Site fenced area	238	The actual area that will be inside the security fence and not accessible to the public. The facility units will be fenced individually.
Powerline easement	37(approximate)	for easement
Roads	5,4 ha	
Powerline expropriation	0, 57ha (approximate)	For pylons erection

7.1. Status of Land Acquisition for İvrindi Mine (September 2017)

Within the İvrindi Mine EIA designated area Site of 836ha, approximately 96% (806ha) of the total is owned by Ministry of Forestry whereas 3.5% (30ha) is pastureland.

The area that will be acquired for the Project is 238 hectares, out of which 4 ha is pastureland and 234 ha is forestland.

Currently, there is no affected private property within the Project Area.

The acquisition of the land will be performed in stages; rehabilitation of the completed pits will be carried out and delivered to the related administration unit. As of September 2017, of the 238 hectares, 102 hectares of land has already been acquired. 102 hectares corresponds to 12% of the EIA permitted and 43% of the Mine site fenced area. The land acquisition for remaining lands will be performed after the completion of the first three years in operation.

The acquisition of the remaining land will be carried out in accordance with the following time line:

- During the pre-production period – 43.7 ha of Kartaldere, pit
- During the 3rd year - 36.6 ha of Kabak Tepe pit
- During the 5th year – 53.9 ha of Ballık and Güney. pit

Pasture land: The file to change the purpose of allocation for the pasture land (4 ha) have been submitted to and approved by the General Manager of the General Directorate of Mining Affairs. Other transactions to take the land from the Provincial Directorate of Agriculture of Balıkesir are ongoing. Permits for the use of the forest land will be obtained stage wise in line with the mining plan.

7.2. Status of land acquisition for associated facilities (September 2017)

Energy Transmission Line (ETL): The ETL will be 7.5 km long. Expropriation of the route of the power transmission line (ETL) is being performed by TEİAŞ, and the easement area is estimated to be around 37 ha. There will be 19 poles erected for the ETL which will equate to 1,900an approximate of 5.7 ha m2 of land being acquired. As of September 2017, consent have been obtained for four private parcel and the land acquisition works are ongoing.

The project will carry out a gap assessment retrospectively on the land acquisition carried out for ETL. If the gap analysis demonstrates that the land acquisition carried out does not meet EBRD Performance Requirements, it will compensate project affected people (PAP) the difference needed to bridge the gap

Roads

The land acquisition for the forest land required for the access road extension has been completed.

Temporary Land Lease:

Land rented during the construction period will be restored to its original condition and delivered to the owners upon the completion of the construction phase and will continue to be leased in the operation period if needed.

Table 3: Project Land Acquisition Status for Ivrindi Mine

Project Feature	Land Used (ha)	Status as of September 2017
EIA Permitted Area	836	102
Mine Site fenced area	238	102 included in EIA Permit Area
Powerline easement	37(approximate)	37 ha, completed by TEİAŞ. The project will do a gap assessment retrospectively on land acquisition done for ETL and pay for the losses if anyone is left out through LRP. Remaining open issues/ complaints will managed through Project Complaint Mechanism.
Roads	5,4 ha	5.4
Powerline expropriation	0, 57ha (approximate)	0.57
Total		145(including the acquisition by public authorities)

8. KEY APPROACH OF TUMAD TO LIVELIHOODS RESTORATION

The livelihood restoration plan will be developed in 6 steps by the first quarter of 2018 prior to construction. These steps will occur iteratively and at times, in parallel, still are described in order, below. Responsibility for implementation of these steps lies with the TÜMAD Community Relations Department.

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

TÜMAD identifies all private land owners and potential users of state land through title deed and through surveys and consultations in the field. Key informants from the villages such as the Mukhtars, agricultural associations, livestock owners and farmers will be interviewed to ensure that all users including those that may be seasonal are known to the Project. Effort will be made to ensure vulnerable users who may be less visible are also included. This identification process is a key step and the Project will ensure that no impacted person/household is left out of the list. In line with EBRD policy the identification process will treat equally those who have formal agreements to use or own land and those who may be termed as informal.

In this stage it may also be appropriate to establish the cut-off date for eligibility. Setting a cut-off date will provide clarity as to eligibility for compensation and assistance.

In identification stage information will be collected on:

- Overall land suitable for animal grazing of the area (000ha);
- Overall land suitable for forestry product collect of the area (000ha)
- Surface area within the fence line (000 ha);
- The percentage of used land by villagers affected by Project activities (temporarily and permanently);
- Field surveys to determine seasonal use of the effected land within the fence line;
- Water sources (location, size, and characteristics);
- Assets on the land such as pathways, rest areas and structures.
- Any other issues that may be considered important by the project affected people (PAPs).

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

Step 2: Loss/Impact Quantification

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).

Forestry and pasture land users- in order to ensure fair livelihood restoration assistance is provided to affected villagers, TÜMAD will determine the area of land which will be fenced for the duration of the Project, while also working with the Authorities to determine typical and acceptable stocking density levels for the type of land suitable for animal grazing and forestry product collection located within the Project fence line. This information will be used to assess the overall impact on land availability for animal grazing and forestry product collection, 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 but will require further investigation to confirm details:

EIA Permitted Area:

- PAPs from Değirmenbaşı and Karadere Villages use the forest for animal grazing and mushroom, herb, hay gathering, other plants and the collection of forest wood for personal consumption (not for trading purposes) as per the socioeconomic baseline surveys.
- Pasture land is also used by Değirmenbaşı and Karadere Villages as per the socioeconomic baseline surveys.
- No fixed assets are identified in the forest and pasturelands to be acquired

Powerline:

- 19 poles have been constructed that disturb active agricultural activities on the footprint;

Access Road:

- Use of forest for animal grazing and mushroom, herb, hay gathering, other plants and the collection of forest wood for personal consumption
- Further consultation needed to reduce impacts and risks associated with movement of animals across the access road.

During the preparation of the Livelihood Restoration Plan the exact number of PAPs in terms of households and people will be determined as well as the value of the products and livelihood income they gain from the affected land for EIA permitted area, powerline and road.

Step 3: Consultation

TÜMAD will use a consultative process throughout the whole process of the livelihood restoration plan development. There are specific points at which community involvement is key. The first is as stated above, the process of actually identifying users of these lands affected by the Project; a second key process is that of undertaking an asset survey/census of all identified users in relevant neighbourhoods (principally in Değirmenbaşı, Karadere and Küçükılıca). The following activities will be undertaken to ensure all affected users are consulted during this process:

- Post an announcement in the neighbourhood, which will be photographed as signed by the *mukhtar* of the village.
- Hold a meeting with land users to discuss:
 - the process - including what will happen after the EIA approval and obtaining other land usage permits by TÜMAD;
 - alternative plans once the mine site is fenced;
 - The villagers' future plans.
- Affected users will be contacted through the *mukhtars* of the relevant neighbourhood (Şahinli and Kocabaşlar).
- *Muhtars* will be notified of a cut-off date for when the census will be undertaken with all affected users.
- 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 (if any);
 - relocation of animal pens from inside the fence to outside the fence (if any);

- 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, Ship and Goat Breeders Union, Agricultural Development Cooperatives and beekeepers etc.;
- Measures as identified by land users and agreed as reasonable by TÜMAD (i.e. within a reasonable budget limit identified internally).

The census is a quantitative information gathering tool and this will be complemented by qualitative research in focus groups so that the Project can fully understand the livelihood structures of different groups in the community and also people's capacity and views on different strategies for livelihood restoration.

This process will also be used to identify vulnerable people in the communities. The nature and extent of vulnerability is context specific and will be used to identify those people who would likely to be affected from project due to their current vulnerabilities and develop specific measures targeting vulnerable people to ensure the project does not contribute to their existing vulnerabilities.

The consultation conducted for Social Impact Assessment included information on the various groups that was received in the interviews made from the village headmen. This information is not exact values but based on the information given by the village headmen.

Information collected from the consultation carried out so far, show that there are potentially PAPs who might be considered vulnerable:

- Of all of the settlements there are houses without land only in Küçükılıca.
- The number of households that can be classified as being in extreme poverty very poor is 15 in Küçükılıca, 30 in Karadere and 100 in Değirmenbaşı.
- The number of households that receive support from the Social Assistance and Solidarity Foundation (SASF) (fuel, aid in kind and in cash) is 5 in Küçükılıca, 45 in Karadere and 50 in Değirmenbaşı.

Step 4: Agree Entitlements Framework

Through consultation with affected land users and key stakeholders (*muhtars* and Government departments), TÜMAD will agree livelihood restoration assistance which will be applicable to all eligible affected land users. 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 TÜMAD. 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 TÜMAD. The Project may consider the possibility to give PAPs third party assistance to understand the implications of the LRP for them and also to answer any queries or doubts that they might have.

Table 4: Preliminary Entitlements Framework

Project Component	Type of Use	Nature of Impact	Action/Entitlements Approach
EIA Permitted Area	Grazing of state-owned forest lands and pasture lands	<p>Permanent loss of customary use grazing area</p> <p>Increased stocking densities on other adjacent grazing areas</p> <p>Inter village conflicts due to scarcity of grazing lands</p>	<p>Community-level actions:</p> <ul style="list-style-type: none"> Find alternative grazing areas through consultation with the users and public authorities Provide support to government agricultural development programmes for households with animal husbandry from affected villages 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 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
	Private land ownership	<p>Purchase/leasing of private land</p> <p>Permanent loss of land and need to find equivalent or better alternative</p>	<p>Land acquired and compensation provided in line with Turkish regulatory requirements and EBRD policy.</p> <p>Land leased as per an agreement with the rightful owner</p>
Powerline	Private land ownership	Permanent loss of land	Land acquired (via expropriation) and compensation to be provided in line with Turkish regulatory requirements and EBRD policy.
	Informal users of public lands under powerline alignment	Potential loss of land or need to have a different configuration in using land	TÜMAD to monitor during construction. If informal land users are identified, they will be assessed in line with the LRP.
	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. Land will be restored.
Project Area of Influence	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 TÜMAD Grievance Procedure and as outlined in the Livelihoods Restoration Framework/Plan
Access Road	Grazing of state-owned forest lands	<p>Permanent loss of customary use grazing area</p> <p>Increased stocking densities on other</p>	<p>Community-level actions:</p> <ul style="list-style-type: none"> Find alternative grazing areas through consultation with the users and public authorities. Alternative grazing land options will be reviewed in detail to ensure suitability. Criteria will include other users of the land and absorption capacity for accommodating new users.

Project Component	Type of Use	Nature of Impact	Action/Entitlements Approach
		adjacent grazing areas Inter village conflicts due to scarcity of grazing lands.	<ul style="list-style-type: none"> Comprehensive information dissemination will be given to the host community to ensure preparation to receive new users. Provide support to government agricultural development programmes for households with animal husbandry from affected villages 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 improving access to alternative income sources (skills development, vocational training), improvement of beekeeping, greenhouse production and other secondary income sources.

9. IMPLEMENTATION SCHEDULE

An LRP will be prepared based on the requirements outlined in this Livelihood Restoration Framework and in accordance with the requirements of PR 5 by 1Q 2018.

The Implementation Plan will be agreed with the Project Lenders and PAPs and well publicised through TUMAD website. The community will also be kept informed of any changes to the LRP Implementation Plan.

9.1. Stakeholder Engagement to Date

Organised Discussions and Meetings

The list of discussions and meetings organised by authorized persons of TÜMAD are as follows:

- 47 stakeholder engagement meetings,
- 18 meetings with public authorities,
- 41 meetings with local people, and
- 4 informative meetings.

Public Participation Meeting during the EIA

- A Public Participation Meeting was held on November 10th, 2015 in a coffeehouse in Değirmenbaşı Village, to which approximately 250-300 people attended.

Visits and Organisations

- Trips to Efemçukuru Gold Mine were organized for a group of 10 people from Değirmenbaşı Village on November 2nd, 2015 and from Karadere Village on November 4th, 2015 and the entire process was investigated in detail. Additionally, the impacts of the Ovacık Gold Mine, which is on the same route, as well as the rehabilitation activities were observed externally.
- Visits and trips to village schools, including meal organizations were made.
- A discussion with the İvrindi District Governor, the İvrindi Mayor and the İvrindi Gendarmerie Commander was held at the District Governor's office for a general debriefing of the İvrindi Project and then a site visit was organized.
- A map showing the location of the Project and a booklet regarding cyanide application were submitted to the İvrindi District Governor, Mayor and Gendarmerie Commander on October 24th, 2016.
- A discussion was held with the Burhaniye Mayor on May 26th, 2017 with regard to the progress of the Project.
- TÜMAD and Değirmenbaşı Villagers participated in the football tournament in the İvrindi Woodsman region organized by the General Directorate of Youth and Sports in honour of Martyr Ömer Halis Demir. Two players from TÜMAD were in the village football team. Second prize was awarded to the team in the tournament. (April-May, 2017)

- As part of the Çanakkale Battle Victory remembrance celebrations theatre shows were held at the Değirmenbaşı Village Primary School and a tour with 40-50 pupils from the primary school to the Çanakkale Martyrs' Memorial was organized in 2016.

Detailed information on stakeholder engagement activities conducted for the project is described in Stakeholder Engagement Plan (SEP) which is part of the SIP Disclosure Package.

9.2. FUTURE STAKEHODLR ENGAGEMENT ACTIVITIES

TÜMAD has a commitment to engage its stakeholders at all levels, including communities, local authorities, NGOs, central government institutions and media. Detailed information on stakeholder engagement activities conducted for the project is described in Stakeholder Engagement Plan (SEP) which is part of the SIP Disclosure Package.

9.3. 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 TÜMAD data;
 - Collect new data if the verification process requires so;
 - Identify all households that will be affected across all Project features (mine site, and powerline).
- Assessment of Impacts:
 - Confirm the impacts based on the updated baseline and other quantitative and qualitative research.
- Mitigation Planning:
 - Confirm mitigations/entitlements based on the revised impacts.

The Livelihood Restoration Plan will be based on the standard TÜMAD 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.

9.4. Livelihood Restoration Plan (LRP)

The Livelihood Restoration Plan (LRP) that will be prepared as a result of the processes presented above, will be based on the standard TUMAD 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);
- Project impacts on livelihoods
- Eligibility criteria and entitlement matrix;
- Procedures for property valuation (if required);
- Consultation plan;
- Implementation schedule;

- Resources, budget and timeline for LRP implementation
- Monitoring, evaluation and reporting.

10. MONITORING

The monitoring measures that are to be implemented during the 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 TÜMAD land/permit experts.

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

10.1. Progress Monitoring

Progress to date has included stakeholder engagement, data gathering and analysis on key aspects that might have adverse impacts on livelihoods such as:

Water

Any water sources in the EIA Permitted Area that are key drinking water source for animal will be identified for replacement or to be taken out of the EIA area.

Census

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 forest and pasture lands.

The households having cultivated trees and other assets in the affected land will be identified. The type and number of such assets will be identified.

10.2. Implementation Monitoring Activities

Forest and pasture land users displaced from the EIA Permitted Area

Users who have been and will be identified as using pasture and forest land within and surrounding the EIA Permitted Area will be subject to periodic consultation to identify and monitor:

- Alternative areas being used for animal grazing and forest product collection;
- Any issues with over-grazing or conflict with other affected users over alternative lands; affected land users will be consulted on at least an annual basis, during the summer grazing season.

Powerline

Monitoring of the powerline will require special care and attention.

Land owners along the powerline will be subject to monitoring by TÜMAD 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.

With the completion of construction, TÜMAD will start undertaking walk-over inspections of the powerline alignment, consult with land owners and consult with *mukhtars* 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

Livelihood impacts that will occur through processes other than land acquisition will also require specific attention during the monitoring stage.

TÜMAD will install dust measurement instrument 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. TÜMAD

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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.

Road

Users who have been and will be identified as using forest land within and surrounding Road extension corridor will be subject to periodic consultation to identify and monitor:

- Alternative areas being used for animal grazing and forest product collection;
- Any issues with over-grazing or conflict with other affected users over alternative lands;

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

10.3. Effectiveness Monitoring

A monitoring programme will be implemented by TÜMAD 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 related compensation to crops and other immovable assets; and the monitoring of grievances will be carried out by TÜMAD 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 LRP 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 affected users;
- 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.

There will be a combination of internal and external monitoring:

- Internal monitoring. Quarterly during the implementation of the LRP and every six months thereafter.
- External monitoring will occur every six months and will be based on both the reports from the internal monitoring and primary research/ consultation with PAPs.

After two years, or when the external monitors agree that livelihoods have been restored, a Completion Audit will be undertaken to assess and confirm the livelihoods of affected users are at least as good as before Project activities commenced. The methodology for the Completion Audit will be agreed between the TUMAD and EBRD (see below) the section on Completion Audit.

10.4. Key Performance Indicators

The table below summarises the Preliminary 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.

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Table 3: Key Performance Indicators

ID	KPI	Target	Monitoring
LRF-IVR-KPI 01	Agreements with land users in Karadere, Küçükılıca and Değirmenbaşı , and other identified and affected land users, established and implemented	Establishment of Agreements with land users from both neighbourhoods, and other identified and affected land users, prior to commencement of operations Implementation of restoration actions as agreed	Quarterly monitoring and reporting to displaced households and their neighbourhood <i>mukhtars</i>
LRF-IVR-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 completion of the LRP implementation
LRF-IVR-KPI 03	Number of users of the lands in the affected communities.	All displaced households included in the Livelihoods Restoration Plan	Quarterly monitoring and reporting to displaced householders and their neighbourhood <i>mukhtars</i>
LRF-IVR-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.	Quarterly monitoring and reporting to displaced householders and their neighbourhood <i>mukhtars</i>
LRF-IVR-KPI 05	Grievances related to livelihoods restoration resolved within one month	All complaints resolved within one month after it is recorded	Monthly review of grievance log and stakeholder engagement records

10.5. LRP Completion Audit

TÜMAD 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 completion of the LRP implementation 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.

11. AUDIT AND REPORTING

11.1. External Auditing

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

11.2. Record Keeping

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

12. GRIEVANCE MECAHNISM

TUMAD have an established external grievance mechanism which is available for every stakeholder to use. Any comments or concerns can be brought to our attention either verbally or in writing (by post or e-mail) or by filling in a grievance form (an example is included in Annex 1 of SEP and Non –Technical Summary (NTS) the grievance form will be made available in on the Project website (www.tumad.com.tr) alongside this description of the grievance mechanism. Grievance forms can then be submitted to the Company through contact details provided below at the end of this plan.

According to TUMAD Grievance Procedure all grievances will be:

- Acknowledged within 3 days; and
- Responded to no later than 30 days.

Grievance information is recorded in a grievance log by specifically nominated and trained members of staff. We TÜMAD logs the following information:

- Name and contact details,
- Details of the grievance and how and when it was submitted, acknowledged, responded to and closed out.

TUMAD will continue to provide communication information to the project stakeholders about the grievance mechanism during the lifetime of the Project.

More specifically the owners and users of the affected lands and the vulnerable groups will be particularly informed through the special stakeholder engagement activities (as detailed in the SEP) on the following topics:

- Procedure for grievance and feedback
- Training on grievances procedure
- Process for Grievance Solution (including security and responses to problems of construction or mining contractors)
- Accident grievance and expectation form,
- Suggestions and complaints boxes, letters and telephone conversations

12.1. Contact Details of TÜMAD Madencilik A.Ş

In order to ask a question, to make a comment and to complaint, stakeholders may reach General Directorate and Operations' Formal Communication departments by using following contact information.

Tümad Madencilik A.Ş. General Directorate

Buğday Sokak No:9 Kavaklıdere Çankaya ANKARA

Tel : 0 312 455 16 10

Fax: 0 312 455 16 01

Email: info@tumad.com.tr

Tümad Madencilik A.Ş. İvrindi Gold Mine Operation

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