



SAKARYA GAS FIELD DEVELOPMENT PROJECT

STAKEHOLDER ENGAGEMENT PLAN (SEP) FOR 2025

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Information Classification

Code	Description of Information Classification
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ABBREVIATIONS AND DEFINITIONS

Aol	Area of Influence
BOTAŞ	Petroleum Pipeline Company
CLO	Community Liaison Officer
ECAs	Export Credit Agencies
EIA	Environmental Impact Assessment
EPCI	Engineering, Procurement, Construction and Installation
EPs	Equator Principles
ESMS	Environmental and Social Management System
ESIA	Environmental and Social Impact Assessment
FMS	Fiscal Metering Station
FPU	Floating Production Unit
GBV-SEAH	Gender Based Violence, sexual exploitation, abuse, and harassment
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
HHS	Household Survey
HSSE	Health, Safety, Security and Environment
H&S	Health and Safety
IFC	International Finance Cooperation
IFIs	International Finance Institutions
LRP	Livelihood Restoration Plan
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NTS	Non-Technical Summary
OG	Official Gazette
OPF	Onshore Processing Facility
PAPs	Project Affected Persons



PPM	Public Participation Meetings
PR	Performance Requirement
PS	Performance Standards
SEP	Stakeholder Engagement Plan
SGFD	Sakarya Gas Field Development
SURF	Subsea Umbilicals, Risers, and Flowlines
SPS	Subsea Production System
TEMA	The Turkish Foundation for Combating Erosion Reforestation and the Protection of Natural Habitats
TPAO	Turkish Petroleum Company
TP-OTC	Turkish Petroleum Offshore Technology Centre
WBS	Western Black Sea



Area of Influence: Aol refers to the geographic region and communities that are directly or indirectly affected by a project’s activities. This includes areas impacted by construction, operation, and any associated facility, as well as the social, economic, and environmental aspects influenced by the project. The Aol is crucial for identifying and engaging with stakeholders, assessing potential impacts, and implementing mitigation measures to ensure sustainable and responsible project development.

Environmental and Social Impact Assessment: The Social and Environmental Impact Assessment (S&EA) process is a way to identify, predict and assess the type and scale of potential E&S impacts, and opportunities to benefit conservation associated with any business activities or projects.

Grievance Mechanism: This Good Practice Note defines a grievance as a concern or complaint raised by an individual or a group within communities affected by project operations. Both concerns and complaints can result from either real or perceived impacts of project operations and may be filed in the same manner and handled with the same procedure. The difference between responses to a concern or a complaint may be in the specific approaches and the amount of time needed to resolve it.

Project Affected People: Project affected people refer to the individuals and communities likely to be subject to the environmental and social impacts caused by the Project.

Public consultation: As referred to in this Good Practice Manual, public consultation is a tool for managing two-way communication between the Project sponsor and the public. Its goal is to improve decision-making and build understanding by actively involving individuals, groups and organisations with a stake in the Project. This involvement will increase a Project’s long-term viability and benefit locally affected people and other stakeholders.

Stakeholder: Stakeholders are persons or groups who are directly or indirectly affected by a Project, as well as those who may have interests in a Project and the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organisations and groups with special interests, the academic community, or other businesses.

Stakeholder Engagement Plan: Stakeholder engagement is an umbrella term encompassing a range of activities and interactions over the life of a Project, including the Stakeholder Identification and Analysis, Information Disclosure, Stakeholder Consultation, Negotiation and Partnerships, Grievance Management, Stakeholder Involvement in Project Monitoring, Reporting to Stakeholder and Management Functions.

Stakeholder Mapping: Stakeholder mapping is the process of identifying and categorizing all the individuals, groups, or organizations that have an interest or stake in a project. This strategic tool helps projects visually plot these stakeholders to understand their needs, influence, and impact on the project. By doing so, it ensures better communication, improves decision-making, and helps manage stakeholder expectations effectively.

Vulnerable People: Vulnerability status may stem from an individual’s or group’s race, colour, sex, language, religion, political or other opinions, national or social origin, property, birth, or status. The client should also consider gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

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1.0 INTRODUCTION

1.1 Project Overview

Sakarya Gas Field Development Project (Project) is planned by Turkish Petroleum Corporation (TPAO or Project Owner) to extract, transport to shore and process the natural gas, discovered in the Sakarya Gas Field, in the exclusive economic zone of Turkey, off the Western Black Sea (WBS) Region, and the natural gas reserves to be discovered through the ongoing exploration. Turkish Petroleum Offshore Technology Center (TP-OTC or Project Executor), 100% owned by TPAO will be conducting Project Management and Engineering, Procurement, Construction and Installation (EPCI) for the Project. The SGFD investment involves three phases: Phase 1, Phase 2, and Phase 3.

The Project investment will be realized in two phases, Phase 1 and Phase 2:

- **Phase 1** involves natural gas production with the subsea production system (SPS) from 12 wells in the Sakarya Gas Field. The gas is transported onshore through an approximately 170 km long, 16-inch (40.64 cm) diameter steel pipeline, processed at the Onshore Processing facility (OPF), and delivered to the Petroleum Pipeline Corporation (BOTAŞ)¹. The infrastructure for Phase 1, including the SPS, SURF (Subsea Umbilicals, Risers, and Flowlines), and OPF, has been installed. The first gas arrival onshore was achieved in 2023.

Once processed at the OPF, the gas produced at the Sakarya Gas Field will be measured at a Fiscal Metering Station (FMS) and offloaded to the national grid via a ~36 km onshore pipeline. Both the FMS and the natural gas pipeline (the Project) is designed, constructed, and operated by BOTAŞ and, in line with the OECD and IFC Performance Standards definition, are considered as Associated Facilities to the main Project.

TP-OTC had a national Environmental Impact Assessment (EIA) prepared for the Phase 1 of the Project per the requirements of Turkish EIA Regulation. After the disclosure process, EIA Positive Decision was secured from the Ministry of Environment, Urbanization and Climate Change (MoEUCC) on Nov 26th, 2021. TP-OTC is considering receiving a loan from Export Credit Agencies (ECAs) or International Finance Institutions (IFIs) for purchase of Phase 1 Subsea Umbilical, Risers and Flow Lines (SURF).

- **Phase 2** involves natural gas production with the SPS from approximately 11 wells in the Sakarya Gas Field. SPS will be connected to the floating production unit (FPU), with SURF (subsea umbilicals, risers and flowlines), where the gas will be processed. The processed, dried gas in the FPU then will be transported to onshore through an approximately 170 km long, 16-inch (40.64 cm) outer diameter steel dry gas offshore export pipeline and delivered to BOTAŞ through a tie-in in the OPF.

Due to the addition of the FPU's, TP-OTC initiated the national Environmental Impact Assessment (EIA) process, for a wider scope including i) the FPU and the offshore pipeline planned for Phase 2, ii) additionally a second FPU and a potential third offshore pipeline within the EIA boundary, that may be planned for the Phase 3.

The process was initiated by submitting the EIA Application File to the Ministry of Environment, Urbanization, and Climate Change (MoEUCC) in July 2024. The EIA Application File refers to the Project as "Sakarya Gas Field

¹ BOTAŞ, which is the associated facility of this Project, takes this camp site management plan as a reference and implements the same Project specific requirements, mitigation measures in parallel with their own integrated management system policies, manuals, plans and procedures.

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Subsea Production Systems, Subsea Transmission Line and Onshore Gas Processing Facilities Integrated Project Revision, and Addition of Floating Production Units.” The Public Participation Meeting, required to be held within the scope of the national EIA process was held on 8th of August 2024. This meeting allowed TP-OTC to describe the activities that will be held within the scope of Phase 2 and Phase 3 to its stakeholders. Also, government agencies have been informed about the Project.

The Environmental and Social Impact Assessments (ESIAs) compliant with the relevant International Standards (Equator Principles IV, World Bank Environmental and Social Framework and Environmental and Social Standards, IFC Performance Standards and Guidelines, and Good International Industrial Practice - GIIP) for Phase 1 and Phase 2 of the Project was carried out by WSP.

As for Phase 1, Phase 2 of the ESIA will be disclosed to stakeholders as the disclosure package, which demonstrates Project’s compliance with international requirements.

1.2 Project Location and Surrounding Settlements

The onshore facilities of the Project will be located in Çaycuma District of Zonguldak Province, 25 km from Zonguldak centre and 15 km from Çaycuma district centre beeline. The nearest settlement to the SGFD is Sazköy village, and the nearest residential building/structure in the village is located approximately 300 meters east. This is followed by Aşağıhsaniye with 1300 meters, Derecikören, Sefercik and Gökçeler with 1400 meters and Yeşilyayla with 2800 meters.

OPF is bounded by:

- North: Black Sea
- Northeast: Coastal Logistics Centre
- East: Sazköy Village (the nearest residential building/structure is 300 m)
- West: Filyos River and Filyos Industrial Zone (under construction) and Sefercik Village
- South: Derecikören Village (1400 m), Gökçeler Village (1400m)
- Southeast: Aşağıhsaniye Village (1300m)

The existing roads used for Phase 1 will be used in the Phase 2 construction phase and no link road is planned.

The settlements within the Project Area of shown in Figure 1-1 and the Project layout is presented in Figure 1-2.

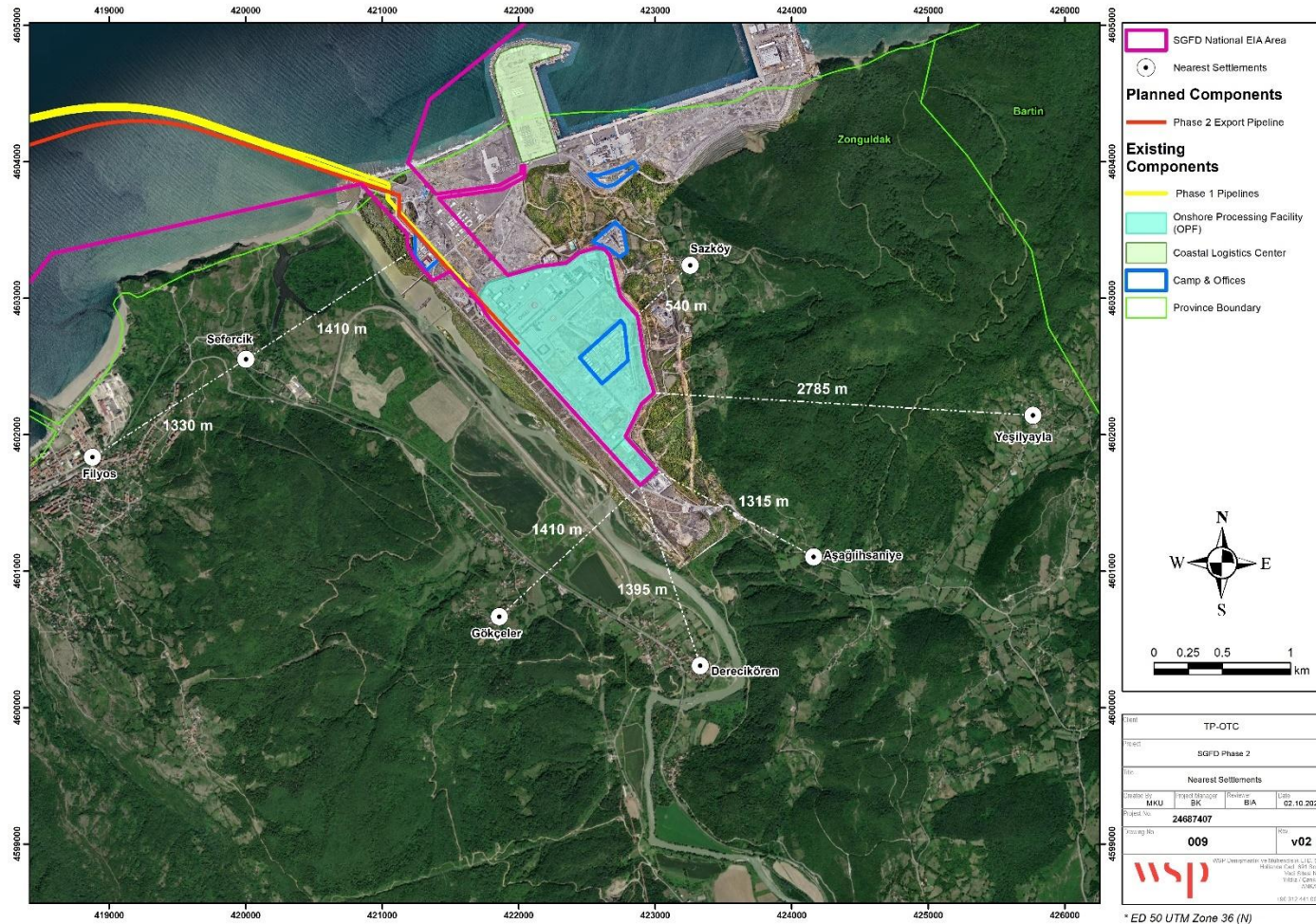


Figure 1-1 Nearest Settlements to the Project

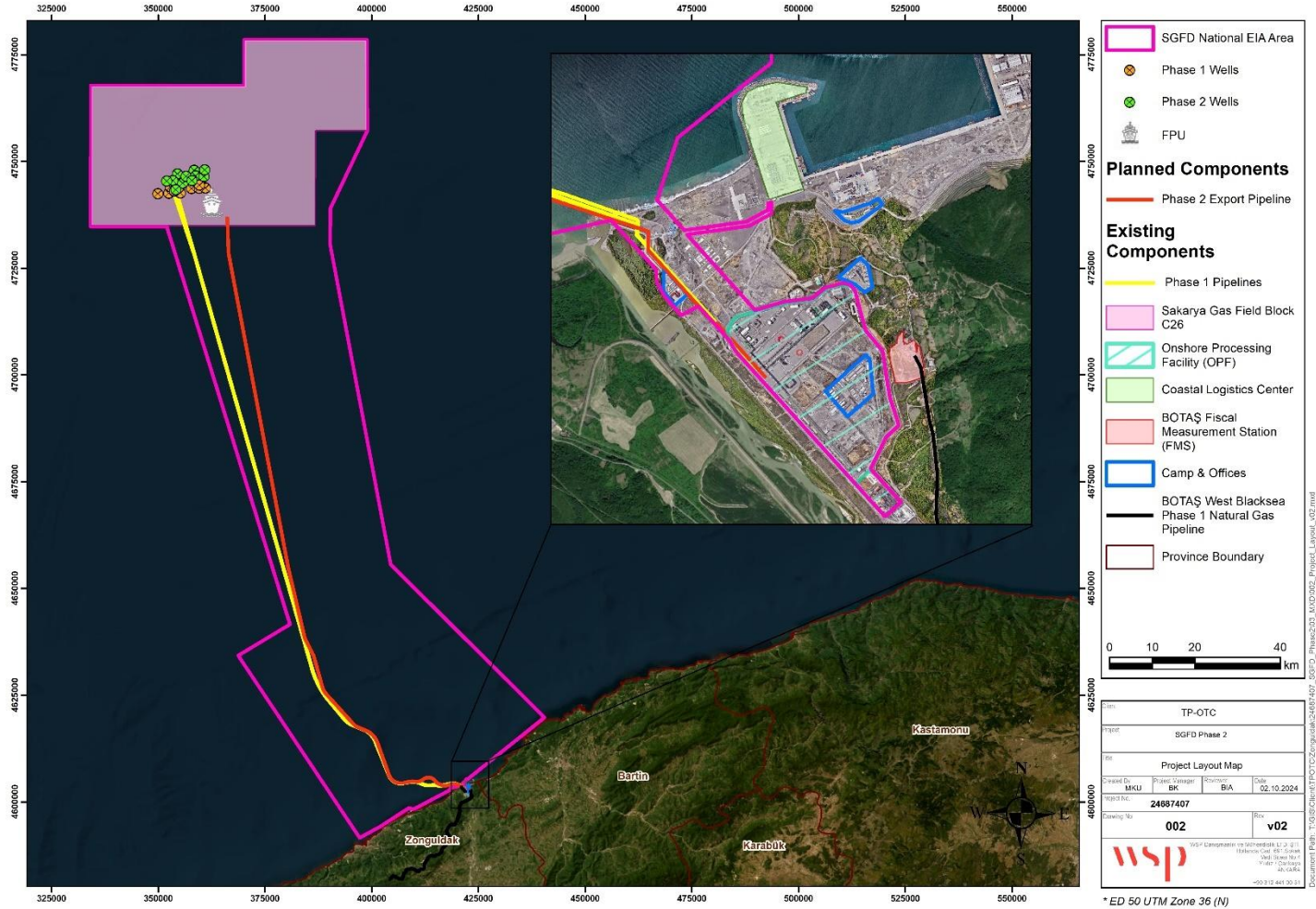


Figure 1-2 Project Layout

The ownership status of the onshore areas of the SGFD is summarized below:

- The industrial zone area, where the OPF (including transformer station) was constructed, is owned by the treasury and assigned to Turkish Ministry of Industry and Technology. Upon assent of Turkish Ministry of Industry and Technology, the pre-easement of this land was granted to TPAO. After EIA Positive Decision was obtained, right of easement was granted by General Directorate of National Real Estate to TPAO for 49 years for the Project, with the consent of Ministry of Industry and Technology. With the Presidential Decree No. 5071 published in the Official Gazette dated 6 January 2022, this area was removed from the Filyos Industrial Zone area and allocated to TPAO as a special economic zone.
- The area between the shoreline and OPF, where the Phase 1 SURF and the Phase 2 export pipeline passes through, is partly in the industrial zone and partly in the area where the right of easement was given in favour of the Ministry of Transport and Infrastructure and the use of land in the zoning plans was determined as coastal logistics centre. With the Presidential Decree No. 5071 published in the Official Gazette dated 6 January 2022, the part of the area (industrial zone) was allocated to TPAO as an individual investment site and consent/easement was made with the Ministry of Transport and Infrastructure for the other part.
- Energy transmission line passed through forest land which belongs to treasury except 1 private agricultural land. Agricultural land was expropriated, and non-agricultural land use permit was obtained from the Provincial Directorate of Agriculture and Forestry if required. Forest land was allocated after the permission to be obtained from the Provincial Directorate of Agriculture and Forestry.
- In addition, lodgings were on an area of 2 hectares, approximately 1.8 km west of the Project area, to be used in the construction and subsequent phases of the Project. TPAO purchased the title deed from the Ministry of National Defence.
- In the Project's offshore Section, subsea production system, subsea umbilicals and the pipelines are located in Türkiye's territorial waters with a width of 12 nautical miles, while the other part is located in Türkiye's exclusive economic zone. The entire subsea production system is located over approximately 170 km offshore, at a depth of approximately 2,200 m, within the Türkiye exclusive economic zone. Türkiye's right of usage for the territorial waters located on the seaside of the Project is set out in the Territorial Waters Law. TPAO is not required to acquire any lands in this area.
- The onshore part of the Project site was used as a stockpile area during the construction of Filyos Port before it was declared an industrial zone. After the area was declared as special investment zone and EIA Positive Decision for Phase 1 was obtained, pre-easement of this land was granted to TPAO.

1.2.1 Camp Sites

For the construction phase of Phase 2, the pre-existing camp and office areas within TP-OTC facilities from Phase 1 will be utilized. Additionally, an area with social facilities and VIP containers for guests will be available. The campsites include:

- **TP-OTC O&M Campsite:** Capacity of 178
- **TP-OTC Contractor Campsite:** Capacity of 600
- **Landfall Campsite:** Capacity of 150

These campsites are fully equipped with essential amenities such as accommodation with water and electricity, office buildings, security features, toilets, kitchens, dining rooms, laundry, medical treatment rooms, recreation

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facilities, communication services, diesel generators, external lighting, waste management areas, wastewater treatment plants, water treatment units, and emergency muster points. Most housing units are prefabricated containers connected to pre-installed utilities. All campsites are within a secure, fenced, lighted, and guarded zone.

To ensure effective communication and address concerns related to the camp sites during Phase 2 construction, regular information sessions, community meetings, and village visits by the Project CLOs will be conducted. Additionally, implementation of a grievance mechanism and continuous updates on the grievance mechanism by the CLOs will keep the communities informed.

1.3 Stakeholder Engagement Objectives

Stakeholder engagement is a key element in building strong, constructive, and responsive relationships which are essential for the successful management of a project's environmental and social risks and impacts. It aims to inform stakeholders about the potential environmental and social impacts related to the project through appropriate disclosure of information, to ensure their perceptions of the proposed development are as accurate as possible, to consult with them to obtain feedback, and to provide a mechanism for resolving any concerns or complaints they might have.

Stakeholder engagement process helps to:

- identify and involve all potentially affected stakeholders,
- generate a good understanding of the Project among those that will likely to be affected,
- identify issues early in the Project cycle that may pose risks to the Project or its stakeholders,
- ensure that mitigation measures are appropriate (implementable, effective, and efficient); and
- establish a system for long-term and mutual communication between the Project and stakeholders that is of benefit to all parties.

The Stakeholder Engagement Plan (SEP) is a guiding document that maps the main categories of stakeholders who will be meaningfully engaged within the development and implementation of a project. This SEP highlights the way TP-OTC plans to communicate with relevant stakeholder groups who may be affected by or interested in Project activities.

The main purposes of this document are to:

- define a consultation approach as well as activity and implementation framework for engagement of stakeholders in relation to construction and operation,
- identify resources and responsibilities for implementation and monitoring of the engagement program; and
- set up a grievance mechanism for the stakeholders, including a process to address views and concerns.

The approach presented in this SEP builds on public engagement provisions of Turkish legislation and international good practice/guidance. It outlines the TP-OTC's commitments and strategy in terms of engaging stakeholders during Project pre-construction, construction, and operation phases.

The SEP is a 'living document' which will be progressively developed through updated versions in line with the phases of the Project. The SEP will be made publicly available at the communities in the Project area of influence

in Turkish and will be disclosed on TPAO website both in English and Turkish and will also be made accessible to local communities.

2.0 LEGISLATIVE REQUIREMENTS AND APPLICABLE STANDARDS

This section outlines the legislative requirements and applicable standards that govern the Project. It includes national and international regulations, guidelines, and best practices that must be adhered to throughout the Project lifecycle.

2.1 Turkish Requirements for Stakeholder Engagement and Public Consultation

2.1.1 The Constitution of the Republic of Türkiye

“The Constitution of the Republic of Türkiye” is the main document related to the stakeholder engagement component of the Project. The articles of the Constitution related to engagement issues are listed below:

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal their thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of their thoughts and opinions.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Freedom of Expression and Dissemination of Thought

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or pictures or through other media, individually or collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Health, the Environment and Housing

A. Health Services and Conservation of the Environment

ARTICLE 56. Everyone has the right to live in a healthy, balanced environment.

It is the duty of the state and citizens to improve the natural environment and to prevent environmental pollution.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - XI. Conservation of Historical, Cultural and Natural Wealth

ARTICLE 63. The state shall ensure the conservation of the historical, cultural, and natural assets and wealth and take supportive and promotive measures towards that end.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Right of Petition

ARTICLE 74. Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and the Turkish Grand National Assembly about the requests and complaints concerning themselves or the public.

2.1.2 Other main national laws/regulations

I. Civil Law

Real property rights and restrictions are defined under the relevant section of Civil Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and met in all phases of the Project.

II. Law on the Right to Information

Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. Everyone has the right to information on the activities of public institutions and professional organisations, which qualify as public institutions.

III. Law on the Use of Right to Petition

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities about the requests and complaints concerning themselves or the public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreign residents have this right considering the principle of reciprocity and by drawing up petitions in Turkish.

IV. Expropriation Law

Another law related to the involvement of stakeholders in the Project is the Expropriation Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215).

The administration action of the expropriation process is performed in line with the Expropriation Law No. 2942 (Issued on 08.11.1983, Official Gazette No. 18215) according to its purpose, authorisation, procedure, reason, and the subject of the action.

VI. Environmental Law

In addition to the legislation explained above, the fundamental law in Turkish Environmental Legislation is the Environmental Law No. 2872 (Issued on 11.08.1983, Official Gazette No.18132, amended by Law No. 5491). According to the Environmental Law, citizens and the state bear responsibility for the protection of the environment based on the “polluter pays” and “user pays” principles. The law is supported by numerous regulations and decrees prepared or updated in the process of alignment with European Union legislation.

The main stages of the Environmental Impact Assessment (EIA) are defined by the Turkish EIA Regulation (29.07.2022, OG No. 31907).

The projects requiring an EIA Report and the EIA process and other relevant principles and procedures are detailed in the EIA Regulation. The first Turkish EIA Regulation was put into force in 1993, and it was amended in 1997, 2002, 2003, 2008, 2013 and 2014. Finally, the last EIA Regulation came into force on July 29th, 2022.

According to the Turkish Republic Ministry of Environment, Urbanisation and Climate Change (MoEUCC) EIA Regulation (Official Gazette July. 29, 2022; No: 31907), relevant requirements related to the EIA process have been disclosed to the public.

Project’s status according to Environmental Impact Assessment Regulation:

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TP-OTC had a national Environmental Impact Assessment (EIA) prepared for the Phase 1 of the Project per the requirements of Turkish EIA Regulation. After the disclosure process, EIA Positive Decision was secured from the Ministry of Environment, Urbanization and Climate Change (MoEUCC) on Nov 26th, 2021.

Due to the addition of the FPU's, TP-OTC initiated the national Environmental Impact Assessment (EIA) process, for a wider scope including i) the FPU and the offshore pipeline planned for Phase 2, ii) additionally a second FPU and a potential third offshore pipeline within the EIA boundary, that may be planned for the Phase 3.

The process was initiated by submitting the EIA Application File to the Ministry of Environment, Urbanization, and Climate Change (MoEUCC) in July 2024. The EIA Application File refers to the Project as "Sakarya Gas Field Subsea Production Systems, Subsea Transmission Line and Onshore Gas Processing Facilities Integrated Project Revision, and Addition of Floating Production Units." The Public Participation Meeting, required to be held within the scope of the national EIA process was held on 08th of August 2024.

2.2 International Standards

TPAO has committed to developing the Project in line with Good International Industry Practice (GIIP), and specifically the Equator Principles IV, and the International Finance Corporation's (IFC) Performance Standards (PS) The requirements of these standards in terms of stakeholder engagement are briefly provided in the sections below.

2.2.1 The Equator Principles

The EP IV, published in 2020, is a risk management framework, adopted by financial institutions, for determining, assessing and managing environmental and social risk in projects and is primarily intended to provide a minimum standard for due diligence and monitoring to support responsible risk decision-making. The EPs have greatly increased the attention and focus on social/community standards and responsibility, including robust standards for indigenous peoples, labour standards, and consultation with locally affected communities within the Project Finance market. They have also promoted convergence around common environmental and social standards.

In relation to stakeholder engagement clients are required to demonstrate effective Stakeholder Engagement, as an ongoing process in a structured and culturally appropriate manner, with Affected Communities, Workers and, where relevant, Other Stakeholders. According to EPs the client will conduct an Informed Consultation and Participation process. The client will tailor its consultation process to i) the risks and impacts of the Project; ii) the Project's phase of development; iii) the language preferences of the Affected Communities; iv) their decision-making processes; and v) the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion, and intimidation. Principle also requires that clients take account of, and document, the results of the Stakeholder Engagement process, including any actions agreed resulting from such process. Disclosure of environmental or social risks and adverse impacts should occur early in the Assessment process, in any event before the Project construction commences, and on an ongoing basis.

Principle 5 – Stakeholder Engagement: For all Category A and B Projects, the client must demonstrate ongoing, culturally appropriate stakeholder engagement with affected communities and other stakeholders. This includes informed consultation and participation, tailored to the project's risks, impacts, and the needs of disadvantaged groups. The process should be free from manipulation and intimidation, with results documented and disclosed early and continuously.

Principle 6 – Grievance Mechanism: For Category A and relevant Category B Projects, the client must establish a grievance mechanism as part of the Environmental and Social Management System (ESMS). This mechanism should be accessible, transparent, and culturally appropriate, aiming to resolve concerns promptly without

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impeding access to judicial or administrative remedies. The affected communities should be informed about this mechanism during stakeholder engagement.

2.2.2 International Finance Corporation:

IFC's Environmental and Social Performance Standards (published in 2012) define IFC clients' responsibilities for managing their environmental and social risks. PS applies to all investment and advisory clients whose projects go through IFC's initial credit review process. There are 8 performance areas covering risk management, labour issues, resource efficiency, communities, land acquisition, biodiversity, indigenous people, and cultural heritage. In relation to stakeholder engagement, PS 1, Assessment and Management of Environmental and Social Risks and Impacts require that:

- Stakeholders that may be interested in the Project are identified,
- Affected communities are appropriately engaged on issues that could potentially affect them
- A Stakeholder Engagement Plan is implemented that is scaled to the project risks and impacts and development stage and be tailored to the characteristics and interests of the Affected Communities.
- Disclosure of relevant project information to help Affected Communities and other stakeholders to understand the risks, impacts and opportunities of the project.
- A process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and which allows the client to consider and respond to them.
- An appropriate grievance mechanism to address and resolve grievances effectively.

3.0 STAKEHOLDER IDENTIFICATION AND MAPPING

3.1 Stakeholder Identification

This section describes the various categories of identified stakeholders. Identifying stakeholders is a key step in the management of the overall stakeholder engagement process. The list and register of stakeholders will be reviewed and/or updated as the Project progresses. Stakeholders may be external or internal to TPAO & TP-OTC and may be defined as individuals or groups who are:

- Directly or indirectly affected by the Project,
- Interested in the Project and its activities,
- Able to influence the Project and the expected results

The stakeholder's identification process started at early Project preparation stages and was performed by TPAO & TP-OTC employees and Project consultants during direct meetings with authorities, key stakeholders, and representatives of local community. The stakeholders were identified:

- During the review of the socio-economic status of the Project area and meetings on the field,
- Via direct meetings with the TPAO & TP-OTC teams,
- Based on the available documentation and research of desktop information,
- Based on the observation notes made during the site visits; and

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- Based on previous experience with similar gas projects and on local knowledge.

Primary stakeholders are the individuals and the communities who are affected by the Project impacts directly; and secondary stakeholders are those who have an interest or influence on the Project.

The key stakeholders include:

- International (e.g. investors, IFIs).
- Government (e.g. the Republic of Türkiye, relevant ministries, municipalities, and other relevant local authorities).
- Non-governmental organizations.
- Goods and services suppliers, contractors.
- Clients.
- Education and training institutions (e.g. Universities, colleges).
- Industrial sector (e.g. construction and infrastructure trade bodies).
- Internal stakeholders (e.g. Employees, employee representatives, trade unions).
- Local Communities (e.g. affected settlements, local community groups).
- Media.

Based on this, the following list in Table 3-1 presents the key primary and secondary stakeholders identified for the Project.

Table 3-1: Identified Stakeholders

Primary Stakeholders
• National Authorities
• Regional /Local Public Authorities (LPAs)
•Affected Communities: <ul style="list-style-type: none"> • Residents living in close proximity to Project area (outlined in Table 3-3). • Local government and community representatives, local leaders, i.e. mukhtars and other community leaders/representatives. • Women, children, elderly people, and any other vulnerable people who live in the Project affected settlements • General Public (including residents of, and visitors to, the Local Communities) • Community services and Infrastructure organizations • Businesses in nearest settlements • Agricultural and Animal Husbandry Enterprises in Filyos and in the settlements within the Project AoI • Fisheries and Fishery organizations representing those who perform fishing activities in the Project area • Land users for agricultural and animal husbandry purposes, and beneficiaries from the nearby forests within the Project AoI • Tourists using Filyos beach

Primary Stakeholders

- Employees of the Project
- Subcontractors of the Project

Secondary Stakeholder

- Other businesses in the region
- Non-governmental organizations (NGOs)
- Media
- Academic and research organizations

Note: The list will be updated, and new stakeholders will be added in the list as the Project progresses.

3.2 Stakeholder Mapping and Analysis

Mapping (classifying) stakeholders is an on-going process throughout the life of the Project, with some parties being identified in the initial phase of the implementation, while others are added as they become interested in the Project. Table 3-2 provides the outcomes of the mapping and analysis activity performed; for the most relevant stakeholder categories previously identified, the table provides an indication of the impact that the Project can generate on the stakeholder and the potential expectations, opinions and key concerns of the stakeholder.

Table 3-2 Stakeholder Mapping

Stakeholder Group	Interest/Concern	Influence/Power	Impact/Role
Fisheries	Sustainable fish stocks, economic benefits	High	Depend on fisheries for livelihood and sustenance. Directly impacted by and can impact fisheries management policies. Their cooperation is crucial for sustainable practices.
Government Agencies	Regulation, conservation	High	Create and enforce policies. Their support is essential for regulatory compliance.
Local Communities	Livelihood, cultural practices	Medium	Their involvement is key to community support and implementation of practices.
Environmental NGOs	Conservation, biodiversity	Medium	Advocate for sustainable practices and influence public opinion and policy. Their advocacy can lead to policy changes.
Researchers/Academia	Data collection, analysis	Low	Provide scientific data and research to inform policy and practice. Their findings can influence decision-making.
Tourism Industry	Marine ecosystem health, economic benefits	Medium	Benefit from healthy fish populations and marine environments. Their support can help promote sustainable practices.
International Organizations	Sustainable development goals	High	Set international standards and provide funding/support for sustainable development. Their guidelines can influence national policies.
Consumers	Access to sustainable seafood	Low	Demand for sustainable products can drive market changes. Their purchasing choices can impact livelihood practices.
Seafood Industry	Supply chain stability, profit	High	Major player in fisheries management. Their practices can significantly impact sustainability efforts.

This table captures the diverse interests and influences of various stakeholders, including fisheries, within the context of sustainable development.

Table 3-3 Stakeholder Analysis

Type	Stakeholders	Affected		Interested/ influenced								
		Direct	Indirect									
Internal Stakeholders												
Project Investor	TPAO	X										
Project Owner	TP-OTC	X										
Contactors	<table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 30%;">Main Contractor</th> <th>Scope of Work</th> </tr> </thead> <tbody> <tr> <td>Baker Hughes</td> <td>Design, supply, and installation of lower and upper completions. Consulting and supervision during well completions. Ensure compatibility for monitoring and control of the subsurface system.</td> </tr> <tr> <td>Schlumberger (SLB)</td> <td>Design, supply, and installation of flowback equipment for upper completion. Perforation, Gravel Pack equipment installation for lower completion. Design and execution of Perforation, Gravel Pack and Flowback operations Consulting and supervision during upper completions.</td> </tr> <tr> <td>OneSubsea</td> <td>Design, supply, and installation of subsea production systems (SPS). Provide internal tree caps, Christmas trees (XTs), tubing hangers, and subsea control systems. Responsible for subsea control system input to data transfer requirements.</td> </tr> </tbody> </table>	Main Contractor	Scope of Work	Baker Hughes	Design, supply, and installation of lower and upper completions. Consulting and supervision during well completions. Ensure compatibility for monitoring and control of the subsurface system.	Schlumberger (SLB)	Design, supply, and installation of flowback equipment for upper completion. Perforation, Gravel Pack equipment installation for lower completion. Design and execution of Perforation, Gravel Pack and Flowback operations Consulting and supervision during upper completions.	OneSubsea	Design, supply, and installation of subsea production systems (SPS). Provide internal tree caps, Christmas trees (XTs), tubing hangers, and subsea control systems. Responsible for subsea control system input to data transfer requirements.	X		
	Main Contractor	Scope of Work										
	Baker Hughes	Design, supply, and installation of lower and upper completions. Consulting and supervision during well completions. Ensure compatibility for monitoring and control of the subsurface system.										
	Schlumberger (SLB)	Design, supply, and installation of flowback equipment for upper completion. Perforation, Gravel Pack equipment installation for lower completion. Design and execution of Perforation, Gravel Pack and Flowback operations Consulting and supervision during upper completions.										
OneSubsea	Design, supply, and installation of subsea production systems (SPS). Provide internal tree caps, Christmas trees (XTs), tubing hangers, and subsea control systems. Responsible for subsea control system input to data transfer requirements.											

	<p>Subsea7 (SS7)</p>	<p>Design, supply, and installation of infield SURF systems from wells to gathering manifold and from subsea gathering manifold to central manifold.</p> <p>Responsible for subsea tie-ins with spools and support for the trunkline and riser systems.</p> <p>Responsible for the design and installation of riser systems of FPU.</p> <p>Lead development of control systems and umbilicals design.</p> <p>Installation of the FPU mooring system.</p> <p>Develop field lay-out and incorporate data from FPU Contractor and TP-OTC into design.</p> <p>Responsible for pigging facilities and flow assurance assessments.</p>				
	<p>Saipem</p>	<p>Design, supply, and installation of export pipeline.</p> <p>Perform stress analysis and ensure monitoring of the CP system during the EPC phase.</p> <p>Responsible for temporary and permanent cathodic protection for onshore pipeline Sections.</p>				
	<p>FPU Contractor</p>	<p>Responsible for the design of riser hang-off and balcony configuration. Integration of supplied hardware into FPU topsides. Pre-commissioning, tie-in, and commissioning of the subsea control system. Responsible for telecommunications design. Responsible for the design of pigging arrangement in line with operational philosophy, including</p>				

		pigging equipment for use during the operational phase. Responsible for the design of the FPU mooring system.			
Employees	All Project Employees		X		
External Stakeholders					
International bodies and organizations	Lenders, potential lenders				X
National Governmental Authorities	Ministry of Energy and Natural Resources Ministry of Environment, Urbanization and Climate Change Ministry of Agriculture and Forestry Ministry of Labour and Social Security Ministry of Family and Social Services Ministry of Treasury and Finance Minister of Industry and Technology Ministry of Culture and Tourism Ministry of Forestry and Water Affairs Ministry of Interior Ministry of National Defence General Directorate for Highways Turkish Armed Forces				X
Regional/Local Authorities	Zonguldak Governorship Sakarya Governorship Düzce Governorship Çaycuma District Governorate Kozlu District Governorate Alaplı District Governorate Ereğli District Governorate		X		

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	<p>Adapazarı District Governorate Söğütlü District Governorate Hendek District Governorate Cumayeri District Governorate Çilimli District Governorate Akçakoca District Governorate Zonguldak provincial directorates of central government institutions Sakarya provincial directorates of central government institutions Düzce provincial directorates of central government institutions Çaycuma district directorates of central government institutions Kozlu district directorates of central government institutions Alaplı district directorates of central government institutions Ereğli district directorates of central government institutions Adapazarı district directorates of central government institutions Söğütlü district directorates of central government institutions Hendek district directorates of central government institutions Cumayeri district directorates of central government institutions Çilimli district directorates of central government institutions BAKKA (West Black Sea Development Agency) Zonguldak Municipality Sakarya Municipality Düzce Municipality Çaycuma District Municipality Kozlu District Municipality Alaplı District Municipality Ereğli District Municipality Adapazarı District Municipality Söğütlü District Municipality Hendek District Municipality</p>			
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	Cumayeri District Municipality Çilimli District Municipality Filyos and Saltukova sub-district municipality Mukhtars of the affected settlements			
National and Local NGOs and organizations	Chambers of Commerce and Industry City Councils Nature Association Social Aid and Solidarity Promotion Fund TEMA Turkish Association of Mukhtars Union of Chambers and Commodity Exchanges of Türkiye (TOBB) Union of Chambers of Merchants and Artisans Union Chambers of Turkish Engineers and Architects (TMMOB) WWF Türkiye Women-specific associations İŞKUR			X
Education and training institutions	Zonguldak Bülent Ecevit University Sakarya University Sakarya University of Applied Sciences Düzce University			X
Social services	Zonguldak State Hospital Düzce Atatürk State Hospital Sakarya Sadıka Sabancı State Hospital Hendek State Hospital Çaycuma State Hospital		X	

PAPs	Affected settlements, Local community members Mukhtars Vulnerable groups Landowners Formal Land Users Informal Land Users Local Businesses and Organizations	Provinces: Zonguldak, Sakarya and Düzce. Districts: Çaycuma, Centre, Kozlu, Alaplı, Ereğli in Zonguldak; Adapazarı, Söğütü and Hendek in Sakarya; and Cumayeri, Çilimli and Akçakoca in Düzce.				X		
		By Project	By BOTAŞ Phase 1	By BOTAŞ Phase 2	By BOTAŞ Phase 3			
		Sazköy Gökçeler Aşağıhsaniye Derecikören Yeşilyayla Sefercik Filyos Fishery Cooperation Filyos Fishing Community	Aşağı İhsaniye Çayır Derecikören Esentepe Esenyurt Gökçeler Güdüllü Sazköy Temenler Yukarıgöynük Elvanpazarcik/Elvan Elvanpazarcik/Merkez Gerdek (Himmetoğlu) Kabalakli Osmanli Sapça Sofular	Alancık Çırgan KüçükKaymaz Yenidoğanlar Demirciler Kasımlı Çatak Hacıhasan Sarıkadı Ömerli Musabeyli Merkez Asarlı Çevlik Kaymaklar Güllük Külâh Topallı	Göktepe Maksudiye Yeniköy Mağara Kurudil Hacıkişla Eskibiçki Taşlık Üvezbeli Yukarıavlıyan Avlıyan Sırtpınar Karaçörtlen Altunçay			
Media		Pusula Gazetesi - Online Newspaper İnanış Gazetesi - Newspaper Halkın Sesi Gazetesi - Newspaper Demokrat Çaycuma Gazetesi - Newspaper Devrek Postası - Newspaper Bartın Pusula Gazetesi - Newspaper						X

		Bartın Olay – Newspaper and Television Channel Aba Medya - Newspaper and Television Channel Elmas TV – Television Channel Kanal Z – Radio Channel Düzce Postası – Newspaper Çilimli Postası – Newspaper Akçakoca Gündem – Newspaper Sakarya Yenihaber – Newspaper Sakarya Yenigün – Newspaper Adapostası Gazetesi – Newspaper Hendek Gündem – Newspaper			
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4.0 STAKEHOLDER ENGAGEMENT ACTIVITIES TO DATE

4.1 Engagement Activities Conducted by TPAO

Meetings with stakeholders and potential stakeholders were carried out as the part of the Project preparation both for Phase 1 and Phase 2. The purpose of the meetings was to provide information on the Project to key stakeholders and affected communities and gathering their feedback on the Project. Prior to public participation meeting held during the EIA for Phase 1 and Phase 2, briefing meetings with local authorities were held by general manager of TPAO.

Stakeholder engagement activities within the scope of the Project’s Phase 1 started in 2021 and are still ongoing with a total 2045 stakeholder engagement activities recorded.

From February 2022 (starting date of the stakeholder grievance log) to the commencement of preconstruction activities (Q1 2024), 1462 engagement activities were held with various stakeholders. From February 2022 to June 2024, a total of 1774 engagement activities were held.

The engagement activities of consultation, information disclosure and received grievances from Phase 1 to Phase 2 according to the stakeholder log is provided in Table 4-1.

Table 4-1 Stakeholder Engagement Activities for Phase 1 and Phase 2

Type of meeting	ToM Total
Consultation/ESIA	64
Consultation/LRAP	5
Survey	18
Information Disclosure	653
Grievances	986
Consultation/Community Health and Safety	21
Fishery Information Disclosure	38
Public Participation Meeting (PPM) for EIA of Phase 2	1

All engagements were recorded to log indicating Date, Minutes, TP-OTC Representatives, Location, Name of individual(s), Position in community (if relevant), Stakeholder Classification, Number of participants, Gender, Main subject of discussion, Type of meeting, subject of discussion, issues, Actions required and Comments. The engagement topics predominantly focused on provision of general project information to keep stakeholders well-informed about the Project's progress and implications. Other significant areas of engagement include education, fisheries, and business opportunities

4.2 Engagement Activities During the national EIA of Phase 1

Engagement activities for the Project’s Phase 1 were initiated with a Public Participation Meeting (PPM) held on March 16th, 2021. The PPM provided opportunity to the affected local residents to be informed about the Project and to express their opinions and concerns. The purpose of this meeting and how it was organized have been determined in the "Environmental Impact Assessment Regulation" which is published in the Official Gazette dated 25.11.2014 and numbered 29186 by the Ministry of Environment and Urbanization. An announcement by ARMADA was published in the local newspapers (Çaycuma Ekspres, Demokrat Çaycuma and Compass Newspaper published in Zonguldak) in the region where the Project will be carried out, and in Dünya Newspaper nationally as of 05.03.2021. Due to the Covid-19 precautions, “100” people were allowed to attend the meeting

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as per the pandemic regulations, which allowed one participant per six square meters. The Public Participation Meeting was held at the Filyos Municipality Wedding Hall (which was the biggest hall available as closest to Filyos), approved by the Ministry of Environment and Urbanization, at 13:30, with the participation of ARMADA, the company that prepared the EIA report, and a team from Türkiye Petroleum A.O as the Project owner. The meeting was held under the chairmanship of the Zonguldak Provincial Director of Environment and Urbanization. Approximately 60 people were attended to PPM including national EIA consultant of the Project, TPAO representatives, Ministry representatives, local communities and the Turkish Foundation for Combating Erosion Reforestation and the Protection of Natural Habitats (TEMA).



Figure 4-1 Photograph from PPM



Figure 4-2: Photograph from Briefing Meeting

Questions of the participants and the main concerns and expectations are given in the below bullets.



- Has alternative analysis conducted for the Project?
- Cancellation decisions were taken regarding the Environmental Plan of the Province, did you consider the determinations in the official expert reports prepared by the courts been observed in these cases?
- While there are endemic plants with botanical features at the mouth of Filyos Stream, this area is also a bird watching point. Will sensitivity towards these areas be observed and how will this be monitored?
- Are the sensitivities regarding the nature monument of Filyos bird sanctuary area and the ruins of the ancient city of Tios, located to the west of Filyos Stream, taken into consideration? How are the effects calculated on these areas in the constructions to be made in the sea area? What kind of measures will be taken?
- Çaycuma and Filyos are settlements with a high percentage of people who make a living from fishing, has a method been developed to prevent impact on fishing activities? What will be the effect of the facility?
- Has the effect of the facility to be established on Ramsar areas been measured? Has any method been developed to prevent it from being adversely affected during the construction period?
- It is known that Zonguldak province maintains its feature of being a hot spot as a result of the studies carried out within the scope of the Black Sea Convention against pollution. Has a method been developed to prevent pollution, especially on the seaside?
- Have detailed geological and geotechnical studies been carried out? Has disaster risk management been improved?
- How will employment expectations of the communities meet?
- Will the Project contribute the education of the communities for the employment opportunities?
- Will there be further expropriation? How the Project effect the agricultural activities?

4.3 Engagement Activities during ESIA of Phase 1

Community Level Surveys (CLS)

The aim of this survey was to gather socio-economic information about each of the settlements in the Area of Influence. Topics included population, migration, ethnic composition, age distribution, social facilities and infrastructure, education, social conflict and ills, social cohesion, livelihoods, income generating activities, and land use. The community level survey was filled out by the mukhtar of each of the settlements included in the area of influence. A total of 6 community level surveys were conducted with the Mukhtars of Derecikören, Yeşilyayla, Sefercik, Gökçeler, Aşağıih saniye and Sazköy.

Household Surveys (HHS)

Topics included in the household survey were:

- The level of knowledge of the Project,
- Access to information mechanisms,
- Complaints and feedback about the Project,
- Socio-economic information, including education and skills,

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- Livelihoods and income generating activities; and
- Land ownership and land acquisition information, presented in table below.

A total of 91 households were surveyed in the social area of influence.

Table 4-2: Household Surveys

Name of the Village	Number of Household Surveys
Derecikören	11
Yeşilyayla	5
Sefercik	23
Gökçeler	13
Aşağıhsaniye	13
Sazköy	26
Total	91

Fisheries Survey

In addition to the household surveys detailed survey was conducted with the fisheries in the area of influence to understand the impact on their livelihoods and gather their recommendations to prevent the impact on the livelihoods.

Table 4-3: Fisheries Surveys

Name of the Village	Number of Household Surveys
Tarlaağazı	6
Boğazköy Bartın Çayı	8
Filyos	24
Total	38

Focus Group Discussions (FGD)

FGDs were carried to engage with specific segments of the community that might require special engagement and attention, i.e., women, youth, elderly and vulnerable groups. FGDs were used as an effective approach to bring people together with similar characteristics and socio-economic status to discuss specific concerns or potential impacts related to the Project. A total of six FGDs were conducted with the woman in each village.

Key Informant Interviews (KII)

Key informants are individuals who have specific knowledge and expertise in certain areas relevant to communities. In total 20 KIIs were conducted with representatives from:

- Çaycuma District Governorship
- Zonguldak Governorship

- Filyos Municipality
- Saltukova Municipality
- Filyos Chamber of Craftsmanship
- Filyos Fishing Cooperative
- Environmental Protection Association
- West Black Sea Development Agency
- Provincial Port Manager
- District Agriculture Directorate

4.4 Engagement Activities Held by BOTAŞ for Phase 1

BOTAŞ does not have a project-level stakeholder engagement procedure in place. The Project is required to publish a summary of environmental and social information and hold a series of public hearing to inform about its scope and the main activities to be carried out. BOTAŞ has held public information meetings for the expropriation that comply with national requirements.²

Table 4-4: Summary Table of Public Participation Meetings Held by BOTAŞ for Phase 1

No	District	Settlements	Time
1	Çaycuma	Sazköy	08/01/2022
2	Çaycuma	Aşağı İhsaniye	07/02/2022
3	Çaycuma	Derecikören	08/02/2022
4	Çaycuma	Gökçeler	08/02/2022
5	Çaycuma	Temenler	10/02/2022
6	Çaycuma	Esenyurt	09/02/2022
7	Çaycuma	Yukarı Göynük	10/02/2022
8	Çaycuma	Esentepe	10/02/2022
9	Çaycuma	Çayır	09/02/2022
10	Çaycuma	Güdüllü	15/02/2022
11	Merkez	Sofular	16/02/2022
12	Merkez	Sapça	16/02/2022
13	Merkez	Osmanlı	18/02/2022
14	Merkez	Gerdek (Himmetoğlu)	20/02/2022
15	Merkez	Kabalaklı	18/02/2022

² Reference: Batı Karadeniz Gaz Ölçüm İstasyonu ve Doğalgaz Boru Hattı Bilgi Notu (Rev 2), Page number: 5



No	District	Settlements	Time
16	Merkez	Elvanpazarlık / Elvan	21/02/2022
17	Merkez	Elvanpazarlık	21/02/2022

4.5 Engagement Activities Held for E&S Assessment of BOTAŞ for Phase 1

Issues discussed with BOTAŞ included a project-specific human resource management plan/procedure, code of conduct, labour contracts, E&S inductions, as well as community safety and security concerns perceived by the communities. The community safety and security concerns were particularly discussed in the focus groups for women.

Table 4-5: Summary of Fieldwork for Phase 1

Consultation Date and Method	City/ District	Settlements/ Stakeholders/ PAPs Categories	Consultation Summary
Project Affected Settlements			
16.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Aşağıhsaniye Village	<ul style="list-style-type: none"> ■ Background information of the Project and PAPs/Stakeholders. ■ Socio-Economic information on settlements (e.g., background demographic information, vulnerable individuals and social issues, previous projects and construction, education, land and economy, housing and infrastructure, use of natural resources in the settlement, places of worship and cultural significance, gender and equality). ■ Land acquisition process carried out. ■ Stakeholder engagement and project perception.
16.04.2022 Face to face	Zonguldak/ Merkez	Mukhtar of Osmanlı Village	
16.04.2022 Face to face	Zonguldak/ Merkez	Mukhtar of Himmetoğlu Village	
17.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Esenyurt Village	
17.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Yukarıgöynük Village	
17.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Esentepe Village	
17.04.2022 Face to face	Zonguldak/ Merkez	Mukhtar of Kabalıklı Village	
17.04.2022 Face to face	Zonguldak/ Merkez	Mukhtar of Sapça Village	
17.04.2022 Face to face	Zonguldak/ Merkez	Mukhtar of Sofular Village	
17.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Temenler Village	
18.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Gökçeler Village	
18.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Derecikören Village	
18.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Sazköy Village	



Consultation Date and Method	City/ District	Settlements/ Stakeholders/ PAPA Categories	Consultation Summary
18.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Çayır Village	
18.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Güdüllü Village	
19.04.2022 Face to face	Zonguldak/ Merkez	Mukhtar of Elvanpazarcık/Elvan Quarter	
19.04.2022 Face to face	Zonguldak/ Merkez	Mukhtar of Elvanpazarcık/Merkez Quarter	
Stakeholders			
16.04.2022	Zonguldak/ Filyos	BOTAŞ Representatives	<ul style="list-style-type: none"> ■ Background information of the Project. ■ Land acquisition process carried out. ■ Stakeholder engagement process and grievance mechanism. ■ Labour-related aspects. ■ Community health and safety – related aspects.
19.04.2022 Face to face	Zonguldak/ Çaycuma	Çaycuma District Governorship	<ul style="list-style-type: none"> ■ Background information of the Project. ■ Stakeholder engagement process and grievance mechanism. ■ Land and Economy-related aspects. ■ Use of natural resources. ■ Project perception.
19.04.2022 Face to face	Zonguldak/ Çaycuma	Çaycuma Municipality	
19.04.2022 Face to face	Zonguldak/ Merkez	Regional Directorate of Forestry	
Potential Vulnerability and Focus Group Discussion			
18.04.2022 Face to face	Zonguldak/ Çaycuma	Women Focus Group (Sazköy Village)	<ul style="list-style-type: none"> ■ Women's livelihood activities. ■ Education status of women. ■ Public spaces used by women. ■ Security problems. ■ Project perception, expectations and information about project, women engagement of Project. ■ Grievance mechanism.
17.04.2022 Face to face	Zonguldak/ Çaycuma	Women Focus Group (Esenyurt Village)	

4.6 ESIA Disclosure Engagement for Phase 1

The Project is categorized as “A” and requires full ESIA disclosure for a minimum of 30 days in English. According to the disclosure requirements full ESIA is disclosed on TP-OTC and SACE websites. Following links represents the website addresses of the full ESIA documents

- TP-OTC : <https://tp-otc.com/cevresel-ve-sosyal-etki-degerlendirmesi-raporu/>

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- SACE : <https://www.sace.it/en/about-us/our-commitment/our-environmental-and-social-commitment/details/environmental-and-social-impact-assessment-availability-for-the-sakarya-gas-field-development-phase-i-project>
- EKSFİN : <https://www.eksfin.no/en/cases/https://www.eksfin.no/en/cases/oecd-projects/sakarya-gas-field-development-project-Türkiyeoecd-projects/sakarya-gas-field-development-project-Türkiye>

4.6.1 Non-Technical Summary for Phase 1

The Non-Technical Summary (NTS) explains the outcomes of the Project Environmental and Social Impact Assessment (ESIA) for Phase 1 and reflects TP-OTC's ongoing commitment to provide stakeholders with clear, relevant and sufficient information to enable a proper understanding of the Project was disclosed on the Project website both English and Turkish to all stakeholders and the disclosure process of NTS started on 25 October 2022. Following links represents the website addresses of NTS.

- English: <https://www.tpao.gov.tr/file/2210/sakarya-gas-field-development-project-non-technical-1062635810a6d7ca9.pdf>
- Turkish: <https://www.tpao.gov.tr/file/2210/sakarya-gaz-sahasi-gelistirme-projesi-teknik-olmay-106163580c59819de.pdf>

In addition to the website, disclosure the hardcopies of the NTS was distributed to the following governmental and non-governmental institutions by TP-OTC's Corporate Communications Coordinator.

Table 4-6: NTS Distribution List

NTS Distributed Stakeholders	Distributed Number of NTSs
Mukhtar of Sazköy	1
Mukhtar of Derecikören	1
Mukhtar of Sefercik	1
Mukhtar of Aşağıhsaniye	1
Mukhtar of Gökçeler	1
Mukhtar of Yeşilyayla	1
Chairman of the Fishing Cooperative	1
Governor of Zonguldak	1
Rector of Zonguldak Bülent Ecevit University	1
Zonguldak Provincial Director of Industry and Technology	1
Provincial Directorate of Turkish Employment Agency	1
Çaycuma Organized Industrial Region Presidency	1
Kdz.Ereğli Organized Industrial Region Presidency	1
Alaplı Organized Industrial Region Presidency	1
Provincial Chamber of Commerce and Industry	1
Çaycuma District National Education Directorate	1



NTS Distributed Stakeholders	Distributed Number of NTSs
Agricultural Credit Cooperative – West Black Sea Development Agency	1
Ereğli Chamber of Commerce and Industry	1
Ereğli Chamber of Shipping	1
Alaplı Chamber of Commerce and Industry	1
Devrek Chamber of Commerce and Industry	1
Manager of Çaycuma Chamber of Commerce and Industry	1
TOTAL	22

It should be noted that TP-OTC Corporate Communications team will continue distributing the NTS to the governmental and nongovernmental organizations. NTS will be available at all times, at the mukhtar's offices, indefinitely. Any changes or edits to NTS will be communicated to these organizations immediately.

4.6.2 Public Information Meeting for Phase 1

4.6.2.1 Locations

ESIA Disclosure Meetings for Phase 1 were organized in the Project affected settlements. Instead of holding a single meeting with broad participation, 6 meetings were organized in order to minimize COVID risks, allocate sufficient time to each settlement to express their feedback and ask questions and to focus on settlement specific impacts, and for female participants to express themselves better. The meetings venues are as follows:

- Sazköy Village
- Aşağıhsaniye Village
- Gökçeler Village
- Derecikören Village
- Sefercik Neighbourhood and
- Filyos Fisheries Cooperative

The meeting at Yeşilyayla will be held at a later date, as it had to be postponed due to a funeral at the village.

4.6.2.2 Parties

ESIA Disclosure Meetings for Phase 1 were organized by WSP Golder (now WSP since 2023), TP-OTC and BOTAŞ, where BOTAŞ attended the meetings only at the settlements affected from the construction of the pipeline, i.e. Sazköy, Aşağıhsaniye, Derecikören and Gökçeler.

TP-OTC

TP-OTC as the owner of the Project, accompanied each meeting and responded to questions from attendees, noted grievances and discussed how these will be addressed.

BOTAŞ

BOTAŞ responded to the following questions from attendees, regarding the pipeline and FMS:

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- Questions related with expropriation,
- Compensation for the impacts,
- Submission of grievances and evaluation process.

WSP Golder (now WSP as of 2023)

WSP Golder, as the Project's ESIA consultant, presented the following topics:

- Project parties,
- Project description,
- Environmental, social and biodiversity baselines,
- Impact assessment and specialist studies and their outcomes
- Summary of mitigations,
- Stakeholder engagement process and grievance mechanism:
 - Project contacts and their contact information
 - Grievance forms
 - ESIA Feedback forms

4.6.2.3 Announcements for the Meeting

The Mukhtars of the settlements and the Fishing Cooperative representative were informed on the ESIA Disclosure Meeting via phone and face to face visits by TP-OTC Social Impact Specialist and Community Liaison Officer of the Project and the venues of the meetings were selected according to the recommendations of the Mukhtars. An announcement prepared for the meetings that indicates the aim of the meeting, venue and date and the announcement banners were hung to visible locations at the settlements 10 days prior of the meetings. The photos of the announcements are provided in Figure 4-1 and Figure 4-2.



Figure 4-3 ESIA Disclosure Meeting Announcement



Figure 4-4 Announcement in Sakzöy



Figure 4-5 Announcement in Aşağıhisniye



Figure 4-6 Announcement in Gökçeler



Figure 4-7 Announcement Derecikören



Figure 4-8 Announcement in Sefercik



Figure 4-9 Announcement in Fisheries Cooperative



Figure 4-10 Announcement in Yeşilyayla

4.6.2.4 Project Booklets

The Project booklets were distributed to each participant, and include the below information:

- Project Location Map
- Project Units
- Offshore activities
- Onshore activities
- ESIA studies
- Air Quality
- Greenhouse Gas Emissions
- Noise and Vibrating



- Water and Groundwater
- Waste Management
- Wastewater
- Biodiversity
- Cultural Heritage
- Socioeconomic Impact
- Stakeholder Engagement and Grievance Mechanism



Figure 4-11 Project Brochure for Phase 1

İçindekiler	
Giriş	2
Açık Deniz Bölümü	3
Boru Hattı ve Kıyı Geçişi	6
Kara İşleme Tesisi	7
Çevresel Etkiler	13
SEED Çalışmaları	13
Yıllık Kalitesi	14
İnşaat Aşaması İçin Belirlenen Önlemler	15
İşletme Aşaması İçin Belirlenen Önlemler	16
Sera Gazı Emisyonları	17
Gürültü ve Titreşim	18
Belirlenen Önlemler	18
Yüzey ve Yer Altı Suyu Kaynakları	21
Atık Yönetimi	24
Atıksu Yönetimi	25
Biyoçeşitlilik	26
Açık Deniz Çalışmaları ve Boru Hattındaki Etki Azaltma Önlemleri	31
Kara Çalışmalarındaki Etki Azaltma Önlemleri	31
Kültürel Miras	32
Sosyo-Ekonomik Etkiler	33
Paydaş Katılımı ve Şikayet Mekanizması	37

Figure 4-12 Content of Brochure

4.6.2.5 Presentation

All presentations were made in Turkish by WSP Golder (now WSP since 2023) team explaining the,

- Aim of the Project
- Project parties
- Project location and project units and components
- Project timeline
- Local EIA approval process
- Aim of the ESIA process
- Environmental, social and biodiversity baseline studies,
- Impact assessment and specialist studies and their outcomes
- The outputs of the ESIA process and the main mitigation measures,

- Stakeholder engagement process and grievance mechanism:
 - Project contacts and their contact information
 - Grievance forms
 - ESIA Feedback forms

The presentations were followed by a robust Question and Answer (Q&A) session (approximately 40 minutes), where stakeholders asked questions and WSP Golder (now WSP since 2023), BOTAŞ and TP-OTC teams were able to provide answers and clarifications to their questions or concerns. These comments and responses are captured in the following chapters.

4.6.2.6 **Project Grievance Form**

During the meetings, it was observed that there was a complaint box and forms in each village. During the presentation, grievance forms were distributed to the participants and information about the grievance mechanism was provided.

4.6.2.7 **ESIA Feedback Form**

ESIA Feedback forms were distributed to the participants and some of the participants filled these forms and submitted them to Social Impact Specialist and Project CLO. Filled forms will be further evaluated in terms of grievance, concerns and recommendations and feedback will be provided to the participants.

4.6.3 **Participant Profile**

A total of 214 people attended ESIA Disclosure meetings. A separate meeting was not organized for females as same number of male and female participants attended the meetings. It was observed that the highest attendance was in Gökçeler. Participants by village are presented in Table 4-7.

Table 4-7: Number of Participants

Number of Participants							
Location	Villagers			Project Team			Grand Total
	Male	Female	Total	Male	Female	Total	
Sefercik	13	7	20	5	8	13	33
Fishery Cooperative	19		19	4	8	12	31
Sazköy	14	11	25	6	8	14	39
Gökçeler	16	17	33	6	8	14	47
Derecikören	6	11	17	6	7	13	30
Aşağıhsaniye	14	5	19	6	9	15	34
Yeşilyayla	-	-	-	-	-	-	-
Total	82	51	133	33	48	81	214

4.6.4 **Meeting Outputs**

4.6.4.1 **Sazköy**

Meeting Date: 21 November 2022

Time: 09:00

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Number of Local Participants: 25

Meeting Venue: Sazköy Village Meeting Room

Gender Distribution of Participants:

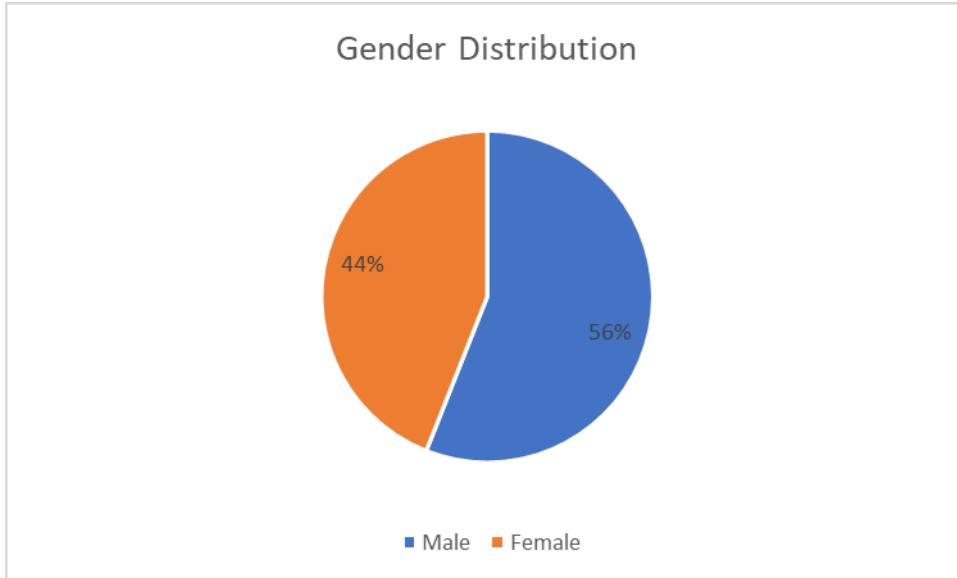


Figure 4-13 Meeting in Sazköy Village

Questions:

1. I live close to the onshore processing facility, will it create an impact (explosion, gas leaks)?

WSP Golder: Modelling studies for various environmental components were conducted and according to the results of the studies, a negative impact that can't be mitigated through design or identified mitigation

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measures, is not predicted. Project design, stack and filters, flare system, leak detection systems have been selected considering the modelling studies, and an alternatives assessment was carried out to select the most environmentally favourable option. Risk assessment was conducted and an emergency management plan has been prepared.

TP-OTC: The nearest project component containing gas is located 380 meters away from the settlement. There are safety systems and leak detection systems installed.

2. Who will compensate the impacts if there is an explosion?

TP-OTC: The necessary precautions and systems to prevent any accidents are planned at the design stage and implemented during the construction phase, however in case of a possible accident, the resultant impacts will be further evaluated and compensated by the government.

3. Will we be able to benefit from natural gas?

TP-OTC: There's a line that goes to the Filyos from BOTAŞ pipeline. However, the distribution of the natural gas to the residential areas is under the responsibility of Akmercan Batıkargaz Natural Gas Company.

4. Will you conduct any road improvement work? Roads to other settlements were constructed.

TP-OTC: There has been significant improvements to the road network. Road improvement works will continue.

5. Project vehicles are not obeying the limit rules.

TP-OTC: Licence plate numbers should be delivered to social impact specialist and CLO for the resolution. A reminder to the contractors will be issued.

6. There are no pedestrian crossings on the new road.

TP-OTC: Since the landowners have not agreed to the additional land requirement for the pedestrian crossing, it was not possible to build it, however alternatives will be -evaluated for the safe crossing of the pedestrians.

7. We want handcraft courses in our village and trainings that will make women earn money. The trainings to be given in Filyos are far away. How do we go from here?

TP-OTC: You can submit your requests through participation forms and TP-OTC will evaluate training courses for female members of the local communities. (A form was distributed to collect the requests during the meeting.)

4.6.4.2 Aşağıhsaniye

Meeting Date: 21 November 2022

Time: 11:00

Number of Local Participants: 19

Meeting Venue: Aşağıhsaniye Village Meeting Room

Gender Distribution of Participants:

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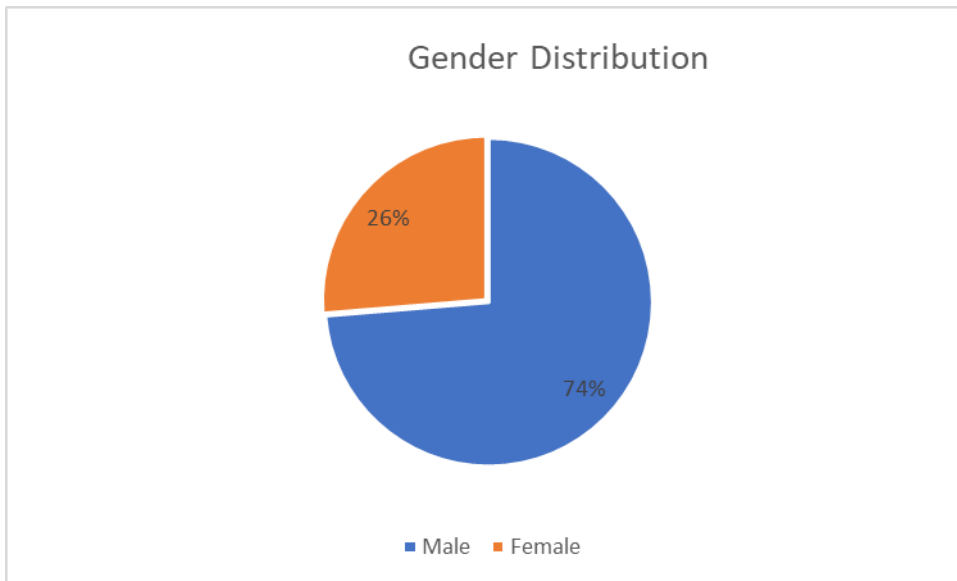


Figure 4-14 Meeting in Aşağıhsaniye Village

1. It was stated by the attendees that they wanted pedestrian walkways. There were grievances related with the construction of the energy transmission line and the lack of pedestrian walkways. The current road condition is not safe for children and animals. Heavy vehicles are using the road and that creates safety problems.

TP-OTC: Since the landowners have not agreed on the additional land requirement for the pedestrian crossing it was not possible to build it however alternatives will be -evaluated for the safe crossing of the pedestrian.

2. We tried to reach to deliver our grievances during the road construction but we could not reach you.

TP-OTC: You can always reach social impact specialist and CLO maybe you tried to contact the contractor of the road construction.

3. New roads are requested.

TP-OTC: Road construction at the section requested is under the responsibility of another governmental bodies. You can raise your request and we can convey them to the relevant authorities.

4. Are you planning further expropriations?

TP-OTC: There will not be any further expropriation for this Project. You will be able to use your agricultural lands after the completion of the construction of BOTAŞ pipeline.

5. We have concerns on the water channels of the State Hydraulic Works.

TP-OTC: This issue will be discussed with State Hydraulic Works.

6. During the construction of the pipeline, hazelnut gardens and septic tanks were affected and this -impact was not compensated by BOTAŞ.

BOTAŞ: The relevant documentation for compensation is prepared by BOTAŞ and delivered to headquarter of BOTAŞ. Compensation payment will be done accordingly.

4.6.4.3 Gökçeler

Meeting Date: 21 November 2022

Time: 13:00

Number of Local Participants: 33

Meeting Venue: Gökçeler Village Meeting Room

Gender Distribution of Participants:

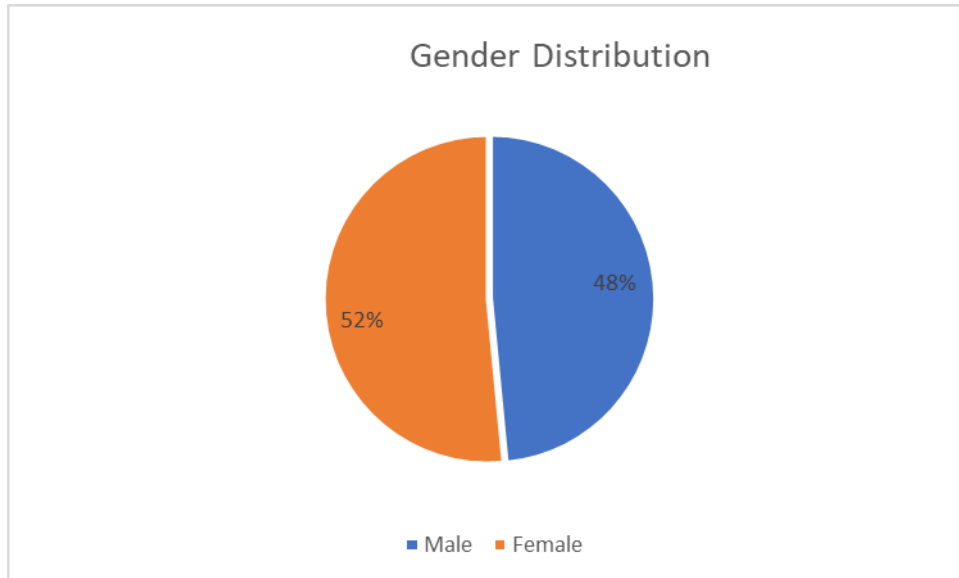




Figure 4-15 Meeting in Gökçeler Village

1. What is the security zone of BOTAŞ pipeline for the construction of the housing?
BOTAŞ: At least 25-38 m. It depends on the gas pressure and the thickness of the pipeline. When you apply for a permit, the necessary calculations would be made and you would be informed.

2. We did not get benefit from the road construction.

TP-OTC: General Directorate of Highways is responsible for planning and construction of the roads.

3. We request environmental and social projects and activate the school and responsibility projects such as playground for children and language trainings for children.

TP-OTC: Currently Project employs approximately 7,500 people and 1,550 of them are hired locally. TP-OTC would like to continue social responsibility projects however, the Project has a limited work schedule and government priorities and complying with the project schedule may cause delays realization of the corporate social responsibility projects. There is mobile education with the decision of held Ministry of Education. The notes on the language training and playground were taken and they will be evaluated.

4. We filled grievance forms related with the individual requests related with the activities for our kids however no feedback is received on our grievance

TP-OTC: Personal request and cash requests will not be responded.

5. What type of social responsibility projects have you realized?

TP-OTC: A health center with five ambulances was built, free of charge. 1500 local people employed from the region. A vocational school was established in Çaycuma. Unskilled labour opportunities were provided to uneducated people such as uneducated housewives. The -shelters were installed at Mosques. -

6. Locals want to get benefit from the Project.

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TP-OTC: We received 60 grievances/request from 6 villages. 50 of them were closed and 10 of them are under the evaluation process.

7. Can you provide help on the maintenance of the Mosque?

TP-OTC: Noted and will be evaluated.

4.6.4.4 Derecikören

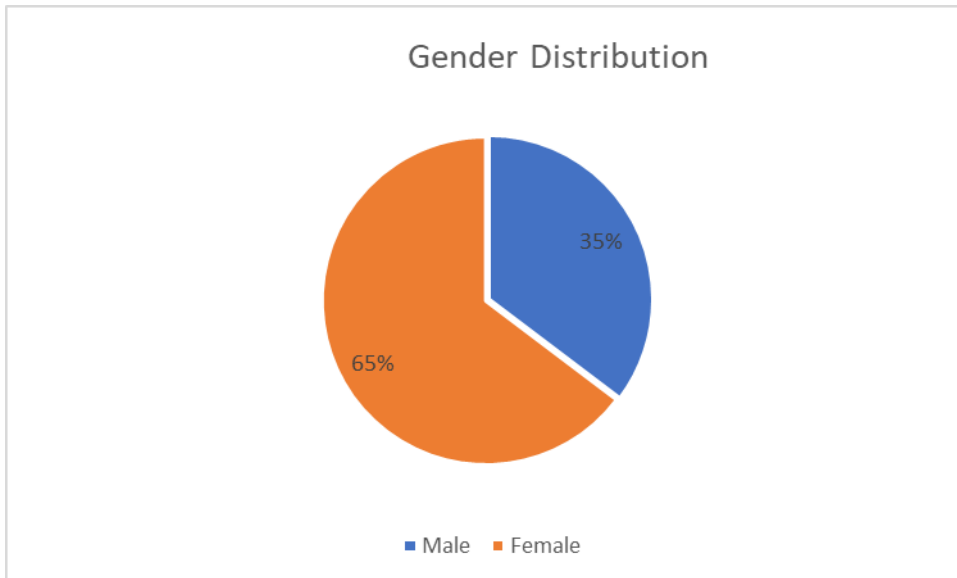
Meeting Date: 21 November 2022

Time: 15:00

Number of Local Participants: 17

Meeting Venue: Derecikören Village Meeting Room

Gender Distribution of Participants:



1. The pipeline route is located in the close proximity of the houses.

BOTAŞ: Relevant technical calculations were done to determine the distance of the pipeline and the houses. Necessary information will be provided during the operation period. The distances are compliant with the BOTAŞ technical specifications where it is calculated based on the natural gas pressure and pipeline thickness.

2. Will we be able to benefit from the natural gas?

TP-OTC: BOTAŞ is not the local distributor. Akmercan Batıkargaz Natural Gas Company is the authorized on this issue. A connection point to Filyos has been built by BOTAŞ. The decision will be taken by the distribution company.

3. There are elderly people in the village. Give us the gas before we die. Let's live comfortably.

TP-OTC: You can submit your requests to the relevant distribution company.

4. What type of infrastructure supports are realized by TP-OTC?

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TP-OTC: The flood problem is prevented; the road is being built.

5. Will there be any other expropriations?

TP-OTC: TP-OTC does not have any plan for further expropriation for this Project.

4.6.4.5 Sefercik

Meeting Date: 22 November 2022

Time: 09:00

Number of Local Participants: 20

Meeting Venue: Sefercik Village Meeting Room

Gender Distribution of Participants:

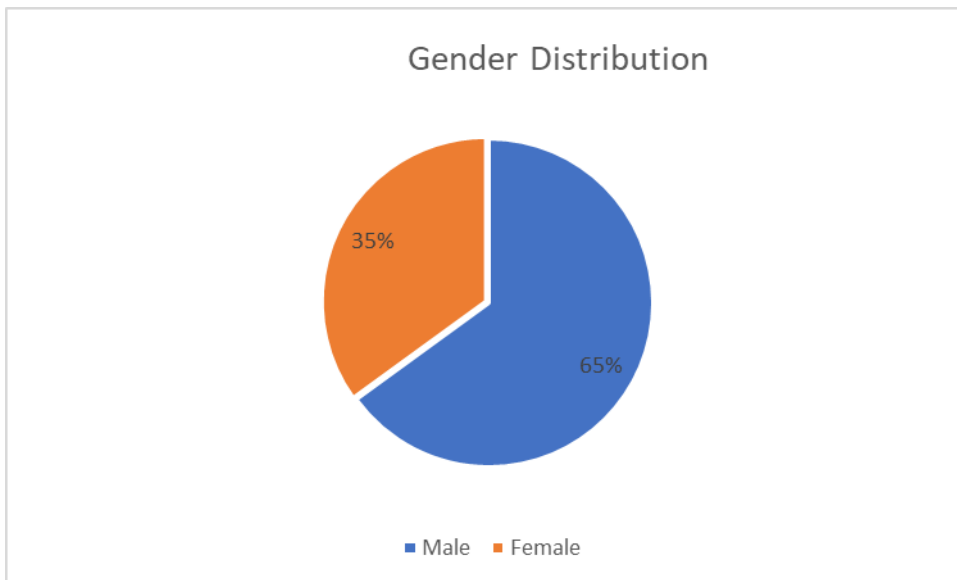




Figure 4-16 Meeting in Sefercik Neighbourhood

1. Will there be additional expropriation here?

TP-OTC: There will be no further land acquisition within the scope of the Project.

2. Our village is the most affected within the scope of the project. The roadside is full of excavations and waste. We expect maintenance of the road. The animals are damaged due to the conditions of the roads. The septic tank of the mosques and the walls of the playground were damaged during the road construction. In order to make the entrance of the neighbourhood look better we request fence. We expect compensation for the damages. We demand a bus-stop to be constructed.

TP-OTC: All requests are noted and will be addressed as soon as possible.

3. There is a water engine in the stream, which harms the fish. Who does this engine belong to?

TP-OTC: This will be checked with the State Hydraulic Works. Project is not abstracting water from the stream.

4. For the next meeting president of Filyos Municipality should be invited.

TP-OTC: As required by the law, in order to hold a meeting, Zonguldak Governorship was officially informed. The institutions will be informed separately.

5. Health employees are not complying with the speed limits.

TP-OTC: The manager of the health employees is warned. (A call was made onsite, immediately)

6. What will happen to contractor workers after the completion of the construction?

TP-OTC: For the next phases of the Project priority will be given to them.

7. Improvement of the bridge over the Sefercik exit is requested.

TP-OTC: Noted

9. The mosque was promised to be illuminated and painted. It was not done either.

TP-OTC: Noted

4.6.4.6 Fishery Cooperative

Meeting Date: 22 November 2022

Time: 13:00

Number of Local Participants: 19

Meeting Venue: Filyos Fishing Cooperative



Figure 4-17 Meeting with Fishery Cooperative

1. Due to the light emissions of the Filyos Port at night, the fish amount decreased considerably. The income from the fishing is lost. There are fish in Bartın however the fish has changed direction due to the light, excavation and filling works. Especially in terms of bottom fishing, this region was damaged. It is not possible to access areas where we usually fish and where fish is abundant. We need to travel farther. Our equipment has been damaged from rocks and one buoy.



TP-OTC: This impact is temporary and will be completed soon. Your grievances are noted and we are working on addressing them. The damaged net will be compensated.

2. Trucks coming from the hub tunnels are coming too fast.

TP-OTC: The corridor with the barriers will be narrowed.

3. Since they cannot enter the fishing area due to NAVTEX fishers are not able to continue beam trawl or bottom fishing.

4. We do not understand the NAV line limits. Please provide maps.

5. The ship passes very close to the fishermen and their attitude is not proper.

6. Do I have to make a transit pass? Do we have to go over the barges?

7. I want improvements in our shelters.

TP-OTC: All concerns of the fishers are recorded and will be evaluated. We are working on developing solutions, reviewing documentations.

4.6.5 Conclusions

The ESIA was disclosed to 5 villages and the Fishery Cooperative and the governmental and nongovernmental stakeholders. It is observed that the Project has established a successful grievance mechanism where the stakeholders can reach out to the Project representatives, Social Impact Specialist and CLO. There are various ways of submitting feedback and grievances, which have been disclosed to public.

It has been observed that the local stakeholders are satisfied from the community supports provided by the Project. However, considering the nature of the construction works there are some concerns related with the Project. The main concerns of the local stakeholders are:

- All villagers have inquired about the future expropriation plans,
- Health & security impacts (such as explosion, gas leaks),
- Safety distances to the pipeline,
- Speed limits,
- Community health and safety impacts related with the lack of pedestrian walkways,

Common requests from the villagers:

- Access to natural gas,
- Requests for vocational training for women,
- Requests for playground, soccer field, mosque repairs, school,
- Improvement of roads, pedestrian walkways,
- Long term Local employment opportunities.

According to the consultations with the Fishers most of the grievances were expressed as follows:

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- Fishers have been made aware of the Livelihood Restoration Plan (LRP) regarding the compensation process fishers requested that the compensation payments will be completed as soon as possible. TP-OTC explained the process will be finalized soon considering their feedback.
- It is claimed that light emissions negatively impact the fish.
- They can't access their fishing areas. They are not able to fish in areas where the fish are abundant.
- Their equipment has been damaged, from large rocks that were probably dumped during the port construction. TP-OTC explained that port construction is not within the scope of the Project.
- They need to sail further for fishing.
- Not all of them expressed the same concerns, while some indicated they can't fish at all, some indicated they need to sail further but the harvest is still not sufficient.
- NAVTEX coordinates have been previously provided via face-to-face meetings, calls, and the information of coastal security units; however, the fishers would like to see a hard copy map to better understand the locations of buoys. TP-OTC handed the required maps during the meeting.
- They have complained about the attitude of the local guards, warning them not to approach the NAVTEX corridor. – TP-OTC will take action and talk to the responsible parties. A training is scheduled for December 8th, 2022.
- Due to the reasons regarding the Phase-1 pipeline maintenance, inspection of life of field service and strategic security, a security corridor for the offshore pipeline will be permanent, less narrow than the existing corridor.

4.7 Media Briefing for Phase 1

4.7.1 Briefing for Foreign Media

Meeting was held with TPAO General Manager, Site Manager, and the foreign press. General information about the project was given, questions of the press was answered. Information about the project area via project mock-up were provided.



Figure 4-18 Foreign Media Briefing for Phase 1

4.7.2 Briefing for National Media

Meeting was held with TPAO General Manager, Site Manager and the national press. General information about the project was given including information on the project area via project mock-up, and questions of the press were answered.



Figure 4-19 National Media Briefing for Phase 1

4.8 Stakeholder Engagement Activities for Phase 2

Engagement activities for Phase 1 of the Project have been successfully conducted and are documented in this SEP. These activities included initial consultations, surveys, and public meetings to gather input and address concerns from various stakeholders.

4.9 Engagement Activities During the national EIA of Phase 2

Engagement activities for the national EIA of Phase 2 were initiated with a Public Participation Meeting (PPM) held on August 8th, 2024. The PPM provided opportunity to the local residents to be informed about the Project and to express their opinions and concerns. The scope and the organization of the meeting was determined as per the "Environmental Impact Assessment Regulation" which is published in the Official Gazette dated 25.11.2014 and numbered 29186 by the Ministry of Environment and Urbanization. The following institutions were notified about the meeting and provided with information regarding the Project:

- General Directorate of Mining and Petroleum Affairs
- General Directorate of Turkish Electricity Transmission Corporation
- General Directorate of Mineral Research and Exploration
- General Directorate of State Hydraulic Works
- General Directorate of Nature Conservation and National Parks
- General Directorate of Forestry



- General Directorate of Water Management
- General Directorate of Maritime Affairs
- General Directorate of Shipyards and Coastal Structures
- Ministry of National Defence
- Ministry of Energy and Natural Resources
- Ministry of Culture and Tourism
- Karabük Cultural Heritage Protection Regional Board Directorate
- General Directorate of Spatial Planning
- General Directorate of Meteorology
- General Directorate of Natural Heritage Protection
- Marine and Coastal Management Department
- Circular Economy and Waste Management Department
- Air Management Department
- Water and Soil Management Department
- Energy Investments Department
- Transportation and Coastal Investments Department
- Zonguldak Provincial Directorate of Environment, Urbanization and Climate Change
- Zonguldak Municipality
- Zonguldak Provincial Directorate of Disaster and Emergency
- Zonguldak Provincial Directorate of Agriculture and Forestry
- Zonguldak Provincial Directorate of Culture and Tourism
- Zonguldak Provincial Directorate of Health
- Zonguldak Special Provincial Administration
- Zonguldak Provincial and Press Public Relations Directorate
- Çaycuma District Governorship
- Kilimli District Governorship
- Çaycuma Municipality
- Filyos Municipality
- Saltukova Municipality
- Sazköy, Gökçeler, Aşağıhsaniye, and Derecikören Villages Mukhtars' Offices
- Sefercik Neighbourhood Mukhtars' Office
- ETC Environmental Technologies Purification Systems Construction Computer Consulting Services Industry and Trade Co. Ltd.

The announcement for the PPM was published in the local newspaper of Demokrat Çaycuma in Zonguldak, and in Dünya Newspaper nationally in 26.07.2024, which are presented in Figure 4-20 and Figure 4-21.



Figure 4-20 PPM Announcement in Local Newspaper

Figure 4-21 PPM Announcement in National Newspaper

The minutes regarding the distribution of the announcement letters to the relevant units and their posting on the boards and announcements are recorded and kept. The Public Participation Meeting was held at the Filyos Municipality Wedding Hall, approved by the Ministry of Environment and Urbanization, at 10:00 on August 8th, 2024, with the participation of ETC, the company that prepared the EIA report, and a team from Türkiye Petroleum A.O as the Project owner. Approximately 95 people were attended to PPM including national EIA consultant of the Project, TPAO representatives, Ministry representatives, local communities and the mukhtars of the settlements.

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Figure 4-22 Public Participation Meeting for the EIA of Phase 2

TP **TÜRKİYE PETROLLERİ A.O.**

**SAKARYA GAZ SAHASI DENİZ TABANI
ÜRETİM TESİSLERİ, DENİZ TABANI NAKİL
HATLARI VE KARA DOĞALGAZ İŞLEME
TESİSİ ENTEGRE PROJESİ REVİZYONU VE
YÜZER ÜRETİM TESİSLERİ**

**HALKIN BİLGİLENDİRİLMESİ VE SÜRECE
KATILIMI TOPLANTISI**

TOPLANTI TARİHİ: 08.08.2024
TOPLANTI YERİ: FİLYOS ÇOK AMAÇLI DÜĞÜN SALONU
TOPLANTI SAATI: 10:00

ÇED RAPORUNU HAZIRLAYAN FİRMA:
ETC ÇEVRE TEKNOLOJİLERİ ARITMA SİSTEMLERİ İNŞAAT BİLGİSAYAR DANIŞMANLIK SAN. VE TİC. LTD. ŞTİ.

Figure 4-23 Presentation for the PPM for the EIA of Phase 2

The meeting covered a range of topics, including the scope of the Project, its location, the environmental characteristics of the Project Aol, the objectives and necessity of the Project, its specific features, capacity and lifespan, land use within the Project, potential environmental impacts and the measures to be taken, photographs of the land section of the Project, and the institutions informed about the Project.

4.10 Engagement Activities during the ESIA of Phase 2

As part of the ESIA studies for Phase 2, several key activities have been conducted to gather comprehensive data and engage with the affected communities. The surveys and interviews conducted in the settlements about the Project are presented in Table 4-8 below. These activities include field surveys in affected settlements of Sazköy, Aşağıhsaniye, Sefercik, Gökçeler, Derecikören, and Yeşilyayla to collect primary data, detailed household surveys to assess various socio-economic aspects and community concerns and focus group discussions specifically with women to ensure their voices are heard. A total of 113 Household Surveys (HHSs) were conducted across six settlements.

Community Level Surveys (CLS)

A total of 6 community level surveys were conducted with the Mukhtars of Derecikören, Yeşilyayla, Sefercik, Gökçeler, Aşağıhsaniye and Sazköy.

Household Surveys (HHS)

Topics included in the household survey were:

- The level of knowledge of the Project,
- Access to information mechanisms,
- Complaints and feedback about the Project,
- Socio-economic information, including education and skills,
- Livelihoods and income generating activities,
- Employment and procurement expectations of households; and
- Opinions related with Phase 2

Table 4-8: Household Surveys

Name of the Village	Number of Household Surveys
Derecikören	17
Yeşilyayla	8
Sefercik	17
Gökçeler	22
Aşağıhsaniye	23
Sazköy	26
Total	113

Fisheries Survey

There are a few ports for fishers along the coast of Black Sea. Based on the socio-economic surveys undertaken for Phase 2 and interviews with the Mukhtars and the representatives of the aquaculture cooperative, only the fishers from the Filyos Port continue to fish in the Aol. fishers During the socio-economic surveys undertaken for

Phase 2, it was confirmed by those interviewed that all harbours and fishers’ cooperatives in the region have their own borders and there is no continuous interaction with each other outside the borders.

Additionally, a fisheries survey was conducted to evaluate the impact on local fisheries and the livelihoods of those dependent on fishing activities. Total 20 surveys to fisheries were conducted and meeting with the Filyos Aquiculture Cooperative management was held.

Focus Group Discussions (FGD)

FGDs were carried to engage with specific segments of the community that might require special engagement and attention, i.e., women, youth, elderly and vulnerable groups. FGDs were used as an effective approach to bring people together with similar characteristics and socio-economic status to discuss specific concerns or potential impacts related to the Project. A total of six FGDs were conducted with the woman in each village.

Sazköy Village

Women generally do daily housework and look after children. There are also university students/graduates in the village. Most of the young women contribute to the household economy by collecting laurel leaves and hazelnuts. The women stated that they had attended the project information meeting once and 2 years ago, the women expressed that they wanted to voice their concerns and suggestions regarding the project.

Aşağıhsaniye Village

Most of the women are doing agriculture as income generating activity. There were complaints regarding employment, pipeline, Energy Transmission Line, expropriation payments, and traffic load which are very close to their houses.



Figure 4-24 Women-only meetings in Sazköy and Aşağıhsaniye Villages



Sefercik Neighbourhood

Generally, women are busy with their gardens, animals and house works. The Mukhtar is their contact point for the Project. 4-5 women are employed by TP-OTC. Their questions were regarding the payments to the private lands which were taken during road construction, special meetings for women about the Project, and an opportunity to sell their agricultural products.

Gökçeler Village

Women are aware that there is no direct relationship between the Project and the settlements. They have concerns about other investments closer to the village. Their demand from the Project is to be in more dialogue with the management as in previous years. They have employment expectations for the young population living outside the village.



Figure 4-25 Women-only meetings in Sefercik and Gökçeler Settlements

Derecikören Village

Derecikören is the only village within the Aol with a woman head. There are strong relationships between women. The villagers are very concerned about the construction of a fertiliser factory near the village.

Yeşilyayla Village

Women are often concerned about road safety for their children and animals. They stated that they cannot attend the Project meetings and there is a need for a separate women's meeting. As in other villages, they do housework, take care of their gardens and go hazelnut picking.



Figure 4-26 Women-only meetings in Derecikören and Yeşilyayla Villages



Figure 4-27 Mukhtar interviews in Aşağıhsaniye and Derecikören Villages



Figure 4-28 Mukhtar interviews in Gökçeler and Yeşilyayla Villages



Figure 4-29 Meeting with Filyos Aquaculture Cooperative Representatives



Figure 4-30 Interviews with the Fisheries

4.11 Engagement Activities for Livelihood Restoration for the Project

A Livelihood Restoration Plan (LRP) for Phase 1 (Doc. No: SC26-OTC-PRJ-PM-PLN-000005_R05, January 2023) was prepared and disclosed for the Project. Following its disclosure, several measures were implemented to support the affected communities:

- Cash Compensation: In June 2023, TP-OTC provided cash compensation to fishers for diesel consumption.
- Fishing Net Support: Upon request, TP-OTC purchased new fishing nets for four fishers whose nets had been damaged.
- Cooperative Support: TP-OTC provided two containers to the Filyos Aquaculture Cooperative, which are now used as a cooperative head office and a meeting room at the Filyos Shelter.

Following Phase 1 activities, a Phase 2 LRP was prepared to define procedures and principles for restoring livelihoods affected by the Project. It assessed both land and marine-based livelihoods and proposed measures to minimize impacts. As part of the Phase 2 ESIA and LRP preparation, stakeholder engagement activities were carried out between August 19-23, 2024 by WSP and TP-OTC representatives. Engagement activities included:

- Interviews with mukhtars, households in the Project AoI, and members of the Filyos Aquaculture Cooperative to evaluate impacts on fishers.
- Social Surveys to further assess socioeconomic conditions.
- Public Participation Meeting (8 August 2024) for the Phase 2 national EIA, where the Cooperative Management participated. During the meeting, the Cooperative President requested updated coordinates and a map after the EIA approval to verify buoy positions.

The PAPs identified in the Phase 2 LRP were the focus of stakeholder engagement activities, including:

- Landowners are those who own eight parcels of land in Aşağıhsaniye Village, affected by the ETL construction.

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- Crews consist of approximately 80 individuals, including boat owners, whose employment income is linked to fishing and maritime activities.
- Commercial Fishers are 22 boat owners who rely on fishing as their primary or supplementary source of income. The Project’s impact on their fishing routes and access to marine resources could directly affect their livelihoods.
- Amateur Fishers include around 200 individuals who engage in fishing either for sport, recreation, or household consumption. Their activities, while not commercial, contribute to local food security and community traditions. This estimate is based on information provided by the Cooperative Representative.

Additionally, past engagement efforts related to the ETL constructed during Phase 1 included surveys conducted in 2022. In 2024, insights from women’s focus group meetings and updates on the expropriation process from the Project owner were incorporated into the assessment.

4.12 Engagement Activities for Livelihood Restoration for BOTAŞ Pipeline

A supplementary LRP for the BOTAŞ Pipeline or the WBS Phase-2 Natural Gas Pipeline was prepared as a part of the Project ESIA to address the potential livelihood impacts associated with the construction and operation of the pipeline.

Two social field studies were conducted by WSP: one from December 10-12, 2024, for Phase 2, and another from January 14-17, 2025, for Phase 3. The engagement activities were supported by representatives from the BOTAŞ Construction and Expropriation Department, Regional Expropriation Liaison Office, and TP-OTC Social Impact Team. The engagement activities were included:

- Surveys focused on affected households, collecting information about their livelihood sources and land-based activities.
- Interviews with mukhtars to understand the impacts of on local lands, the social and economic structure of the villages, and overall livelihoods.

For Phase 2 of the BOTAŞ Pipeline, 15 mukhtars were interviewed, along with 39 landowners representing 64 parcels affected by the Project. The details are outlined in Table 4-9 and the photographs from the activities are presented in Figure 4-31.

Table 4-9 Survey List for Construction Phase-2 Settlements of BOTAS Pipeline

Date	Province	District	Settlement	Interviewed Mukhtar	Interviewed Landowner	Affected Parcel Number
10.12.2024	Zonguldak	Center	Alancık	1	0	0
10.12.2024	Zonguldak	Kozlu	Çırgan	1	2	3
10.12.2024	Zonguldak	Alaplı	Küçükkaymaz	1	2	2
10.12.2024	Zonguldak	Alaplı	Yenidoğanlar	1	3	6
10.12.2024	Zonguldak	Alaplı	Demirciler	1	2	4
10.12.2024	Zonguldak	Alaplı	Kasımlı	1	1	2

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STAKEHOLDER ENGAGEMENT PLAN**

10.12.2024	Zonguldak	Alaplı	Çatak	1	0	0
10.12.2024	Zonguldak	Alaplı	Hacıhasan	1	1	1
10.12.2024	Zonguldak	Alaplı	Sarıkadı	1	0	0
10.12.2024	Zonguldak	Alaplı	Ömerli	1	4	6
10.12.2024	Zonguldak	Alaplı	Musabeyli	0	1	1
10.12.2024	Zonguldak	Ereğli-Ormanlı	Merkez	0	1	1
11.12.2024	Zonguldak	Ereğli	Asarlı	1	7	14
11.12.2024	Zonguldak	Ereğli	Çevlik	1	4	9
11.12.2024	Zonguldak	Ereğli	Kaymaklar	1	4	5
11.12.2024	Zonguldak	Ereğli	Güllük	1	2	3
11.12.2024	Zonguldak	Ereğli	Kulah	1	4	6
11.12.2024	Zonguldak	Ereğli	Topallı	0	1	1
			Total	15	39	64



Figure 4-31: Interviews with the landowners/users at the settlements of Phase-2 of BOTAŞ Pipeline

For Phase 3 of the BOTAŞ Pipeline, 13 mukhtars and 75 landowners were interviewed, providing information on a total of 102 parcels impacted by the Project. The details are outlined in Table 4-10 and the photographs from the activities are presented in Figure 4-32.

Table 4-10: Survey List for Construction Phase-3 Settlements of BOTAS Pipeline

Date	Province	District	Settlement	Interviewed Mukhtar	Interviewed Landowner	Affected Parcel Number
14.01.2025	Sakarya	Adapazarı	Göktepe	1	5	6
14.01.2025	Sakarya	Söğütlü	Maksudiye	1	6	13

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14.01.2025	Sakarya	Söğütlü	Yeniköy	1	8	14
14.01.2025	Sakarya	Söğütlü	Mağara	1	4	4
14.01.2025	Sakarya	Söğütlü	Kurudil	1	9	13
15.01.2025	Sakarya	Hendek	Hacıkişla	1	5	7
15.01.2025	Sakarya	Hendek	Eskibiçki	Meeting with mukhtar and 10 landowners was held, survey could not be conducted		
15.01.2025	Düzce	Cumayeri	Taşlık	1	5	5
15.01.2025	Düzce	Cumayeri	Üvezbeli	1	5	5
16.01.2025	Düzce	Cumayeri	Yukarıavlıyan	1	6	6
16.01.2025	Düzce	Cumayeri	Avlıyan	1	The pipeline passes only through the land of the village legal entity	
16.01.2025	Düzce	Cumayeri	Sırtınar	1	3	4
16.01.2025	Düzce	Çilimli	Karaçörtlen	1	4	7
17.01.2025	Düzce	Akçakoca	Altunçay	1	15	18
			Total	13	75	102



Figure 4-32: Interviews with the landowners/users at the settlements of Phase-3 of BOTAS Pipeline

These interviews were a key part of the engagement activities, aimed that the concerns of affected stakeholders were captured and considered in the planning and implementation of livelihood restoration measures.

4.13 ESIA Disclosure Engagement for Phase 2

The Project is categorized as “A” and requires full ESIA disclosure for a minimum of 30 days in English. According to the disclosure requirements full ESIA is disclosed on TP-OTC and SACE websites. Following links represents the website addresses of the full ESIA Phase 2 documents:

- TP-OTC: <https://tp-otc.com/cevresel-ve-sosyal-etki-degerlendirmesi-raporu-faz2-2025/>
- SACE : [https://www.sace.it/en/about-us/sustainability/our-environmental-and-social-commitment/details/environmental-and-social-impact-assessment-availability-for-the-sakarya-gas-field-development-\(phase-ii\)-project](https://www.sace.it/en/about-us/sustainability/our-environmental-and-social-commitment/details/environmental-and-social-impact-assessment-availability-for-the-sakarya-gas-field-development-(phase-ii)-project)

4.13.1 Non-Technical Summary for Phase 2

The NTS explains the outcomes of the Project ESIA for Phase 2 and reflects TP-OTC’s ongoing commitment to provide stakeholders with clear, relevant and sufficient information to enable a proper understanding of the Project. The NTS was disclosed on the Project website both English and Turkish to all stakeholders and the disclosure process of the NTS started on 24 March 2025. Following links represents the website addresses of NTS:

- English: <https://tp-otc.com/wp-content/uploads/2025/01/Phase-2-Non-Technical-Summary.pdf>
- Turkish: <https://tp-otc.com/wp-content/uploads/2025/01/Faz-2-Teknik-Olmayan-Ozet.pdf>

In addition to the website, disclosure the hardcopies of the NTS was distributed to the following stakeholders outlined in Table 4-11 by TP-OTC’s Corporate Communications Coordinator.

Table 4-11: NTS Distribution List

NTS Distributed Stakeholders	Distributed Number of NTS
Mukhtar of Sazköy	1
Mukhtar of Derecikören	1
Mukhtar of Sefercik	1
Mukhtar of Aşağıhsaniye	1
Mukhtar of Yeşilyayla	1
Filyos Fishery Cooperative	1
TOTAL	6

4.13.2 Consultation Meetings for Phase 2

Consultation Meetings for the ESIA Disclosure for Phase 2 and the distribution of NTS to the mukhtars’ offices were organized in the Project affected settlements. The ESIA for Phase 2 was disclosed to 5 settlements and the Fishery Cooperative. The consulted stakeholders are:

- Sazköy Village
- Aşağıhsaniye Village
- Derecikören Village

- Yeşilyayla Village
- Sefercik Neighbourhood and
- Filyos Fishery Cooperative

TP-OTC Corporate Communications team conducted each meeting with the mukhtars of the settlements and the head of the cooperative and shared information on the Project and distributed the NTS. Delivery records were prepared for each meeting and signed by the participants to confirm receipt of the NTS. Photographs from two meetings are given in Figure 4-33 and Figure 4-34.



Figure 4-33: Consultation with the Filyos Fishery Cooperative for the ESIA Phase 2 Disclosure



Figure 4-34: Consultation with the Mukhtar of Aşağıhsaniye for the ESIA Phase 2 Disclosure

It should be noted that TP-OTC Corporate Communications team will continue distributing the NTS to the Project stakeholders, including governmental and nongovernmental organizations. NTS will be available at all times, at the mukhtar's offices, indefinitely. Any changes or edits to NTS will be communicated to these organizations immediately.



5.0 STAKEHOLDER ENGAGEMENT PROGRAMME

The SEP is designed to ensure that TP-OTC identifies all stakeholders with an interest in the Project and engages with these stakeholders before construction, during construction and operation of the Project. This SEP therefore outlines TP-OTC’s consultation activities to engage with stakeholders during the construction and operational phases of the Project. Therefore, the SEP is tailored to consider the main characteristics and interests of the affected parties, and the different levels of engagement and consultation that might be appropriate for affected parties and other interested parties. The program indicates how consultations will be conducted with different groups in the community, also identifying actions that will be taken to remove barriers to participation. These may include such issues as differing ages and gender, giving rise to different concerns and priorities about the Project’s impacts, preventative and mitigation measures, and potential benefits. Therefore, different and/or separate levels of engagement will be conducted by TP-OTC. Overall, the engagement strategy to be applied is basically based on continuous open communication and negotiations with all stakeholders, avoiding impacts and minimizing the impacts when it cannot be avoided, and establishing high-level contacts with stakeholders in different layers at regular intervals.

5.1 Project Information Disclosure

TP-OTC will disclose Project information to enable stakeholders to understand the Project description and the aim of the Project, risks and impacts of the Project and the mitigation measures tools for the submission of the grievances, Project timeline as well as potential opportunities associated with the Project. The disclosure of information will be in truthful, timely, coherent, inclusive and the appropriate attention and response will be given to petitions, complaints, grievances, requests, and allegations.

The Project has following documents to be disclosed to the stakeholders:

- Non-technical summary of the Project,
- Environmental and social documents, ESIA, Environmental and Social Action Plan (ESAP), SEP, LRP and the other environmental and social management plans of the Project,
- Project brochure,
- Grievance Mechanism tools (forms),
- Project progress updates,
- Information leaflets, letters and other documents on progress update, restrictions, investment programs and other relevant issues for stakeholders.

The following stakeholder engagement tools will be used:

- TP-OTC Office at the Project Site.
- Publishing brochures on the notice boards in the Mukhtars’ offices and communal places in affected settlements,
- Offices of the governmental institutions including Mukhtar’s offices,
- Project and TP-OTC website
- Regular meetings with community representatives, village visits and focus groups discussions with relevant community members,

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- Dissemination of information through media, press and social media
- Email, telephone, post and in person
- Public events

As needed, high level information will be conveyed by the managers to relevant authorities through visits and meetings. The Community Liaison Officer will frequently share information on progress updates, restrictions, opportunities etc., with affected communities, local NGOs and other important stakeholder and local governments. Information for the public will be made available on the website, media and social media.

TPAO has an information disclosure policy and in line with the principles of transparency and accountability, has adopted the principle of communicating effectively and timely with its stakeholders. TPAO believes in the importance of stakeholder participation and timely informing of the public during the project planning and implementation phases. In this context, TP-OTC hereby undertake:

- To communicate with all stakeholders in a way that is based on participative and mutual trust.
- To disclose the principles, practices and procedures of information and public disclosure,
- To ensure that information that is not classified as "Confidential Information," activities and projects is made available to the public, as information determined to be confidential constitutes an exception to the principles of informing the public and stakeholders,
- To classify the information and documents prepared for the purpose of informing the public,
- To make accessible the information be available via the website, in particular the annual reports, policies, fields of activity, annual sectorial reports, sustainability reports, tender announcements and public meetings,
- To publish the website in Turkish and in English and to have the basic documents available at the site in both languages,
- To examine the information requests received in cooperation with the relevant units,
- To meet the information requests as soon as possible in accordance with the legislation,
- To process the requests received from the Ministry of Energy and Natural Resources, TPAO Information Unit (bilgi@tpao.gov.tr) and CIMER in accordance with the same procedure,
- To take the necessary measures to protect the interests of TPAO or of the private (including personal privacy) interests,
- To ensure that these principles apply to any and all non-confidential information TP-OTC collect regarding the stakeholder activities in any medium (printed or electronic, including in some cases audio, visual or audio-visual recording).

TP-OTC also has a Disclosure Policy and according to this Policy TP-OTC believes the importance of stakeholder engagement and public information on time within the scope of the projects conducted with transparency and accountability principles. Accordingly, TP-OTC pledges to:

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- Adopt the respective information and public disclosure methods such as official correspondences, press, social media, websites, public meetings, e-mails, etc. on the condition that this is in compliance with the respective corporate policy and the current applicable legal requirements,
- Ensure disclosure information that is not classified confidential concerning the TP-OTC's operations and projects,
- Classify such information and documents that are prepared for public disclosure purposes,
- Make available the corporate website in Turkish and English, and present fundamental documents thereon in both languages,
- Analyse information requests acting in cooperation with the respective departments and, proceed with them within the shortest time possible according to the applicable legislation,
- Take necessary actions in order to the interest of the Project and/or of the respective stakeholders (including privacy),
- Ensure that these principles apply to any type of non-confidential information produced in relation with the TP-OTC's operations (including printed, electronic, audio, and visible records).

5.2 Stakeholder Consultation and Engagement Activities

The stakeholder engagement processes for the Project will be based on the following key principles. These principles will enable TP-OTC to build open, constructive, inclusive, and respectful dialogue as well as a working relationship with all relevant stakeholders.

- Continuous engagement with all stakeholders
- Proactive stakeholders' visits for key stakeholders identified
- Grievance mechanism to address complaints and grievances effectively
- Engagement of vulnerable groups actively through specific measures
- Supporting consultations and dialogue with community investment programs
- Avoiding adverse effects, minimizing when they cannot be avoided as well as in advance and proper information disclosure on these for affected stakeholders and communities
- Conducting awareness workshops for fishermen and training for TP-OTC staff on cetacean conservation, involving NGOs or marine experts and distributing educational posters in schools to promote cetacean conservation among children.

SEP Execution team consisting of Corporate Communications Manager, Health, Safety, Security and Environment (HSSE) Managers, Senior Social Impact Specialist and Community Liaison Officer will conduct consultation with community members and other concerned stakeholders as well as ensuring that the grievance mechanism is functioning properly throughout the implementation of Project activities using communication channels outlined above or deemed appropriate in relation to the specific stakeholder needs and circumstances. The CLO, as mentioned above, will be actively in contact and consultation with local communities and other affected primary stakeholders.

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SEP Execution team engaged with affected fishermen and fishery organizations regarding the restrictions during construction and operation of Phase 1, which will continue during Phase 2 construction and operation. Timely disclosure of information on restrictions were be made on site as described in Fishing Information Disclosure and Engagement Plan (Please see Appendix-C for the Plan). This includes informing the stakeholders regarding impact mitigation and management plans for the impacts that the project may have on fishing activities.

The approaches taken will thereby ensure that information provided is meaningful, timely, as complete as possible, and accessible to all affected stakeholders, as well as challenges deriving from illiteracy or disabilities, tailored to the differences in geography, livelihoods, and way of life. The Project will also ensure the establishment of a Grievance Mechanism, details of which are provided in grievance management section. The Project will also establish a worker grievance mechanism to enable all direct workers and contractor and subcontractor workers to raise workplace and labour rights related concerns.

TP-OTC will ensure that women, persons with disabilities and other members of vulnerable groups are participating effectively and meaningfully in consultative processes and that their voices are not ignored. This will be ensured through specific measures and assistance to afford opportunities for meetings with vulnerable groups in addition to general community consultations. For example, women are usually more outspoken in women-only consultation meetings than in general community meetings. Similarly, separate meetings need to be held with young people, persons with disabilities.

The Project employed a CLO at the early stages to ensure that stakeholders especially affected local communities and vulnerable groups are informed and consulted properly. Additionally, the Project also employed consultants to advise and support Project staff for realizing an effective stakeholder engagement program.

Furthermore, it is important to rely on other consultation methods as well, which do not require physical participation in meetings, such as social media, or radio broadcasting, where feasible, to ensure that groups that cannot physically be present at meetings can participate. Where this is not possible, CLO and other staff/consultants will visit households of vulnerable people, in particular the elderly and persons with disabilities that are not able to attend communal meetings.

The program of engagement activities that will be performed throughout the lifecycle of the Project is provided in Table 5-1.

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Table 5-1: Stakeholder Engagement Programme

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
Before Construction	Project Affected People Residents of the settlements in the social area of influence Fisheries Vulnerable people PAPs of Associated Facilities	Introduce CLOs of TP-OTC and sub-contractors Project update Livelihood restoration Grievance mechanism process Employment Vulnerability and gender issues Community health and safety issues	Focus group discussion, Trainings/workshops, Public notices, Electronic publications via online/social media and press releases, Distribution of the hard copies of the Project documents to Mukhtar offices, Media announcements, Information leaflets and brochures, Women only focus group discussions.	Project information meetings. ESIA and LRP surveys Before construction in each settlement	TPOTC
	Governmental Parties Municipalities Governors District authorities Academic institutions	Environmental and Social Impacts of the Project and the mitigation measures Stakeholder engagement process and the Grievance mechanism process	Individual meetings Official correspondence Mail, phone calls	When required	TPOTC
	Non-governmental Parties Press and media, NGOs; Businesses and business organizations; Workers' organizations;	Environmental and Social Impacts of the Project and the mitigation measures Stakeholder engagement process and the Grievance mechanism process	Press releases Information leaflets and brochures; audio-visual materials	In each project phase and when required	TPOTC

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
Construction	Project Affected Parties Project Affected People Residents of the people in the Project Area Vulnerable groups Local businesses PAPs of Associated Facilities	Environmental and social awareness Construction phase E&S impacts Community health and safety issues Local employment Impact on livelihoods Construction updates and construction schedule Corporate Social Responsibility Projects	Public meetings, Continuous communication with the Project CLOs Trainings Women only focus group discussions Phone notifications Social media Press release Grievance mechanism Project website	Monthly meetings in all affected settlements to update information on the updated construction status Receive construction related grievances	TPOTC
	Other Interested Parties Governmental intuitions National and local media Non-governmental institutions Business organizations	Environmental and social awareness Construction phase E&S impacts Community health and safety issues Local employment Impact on livelihoods due to construction Construction updates and construction schedule Corporate Social Responsibility Projects	General information meetings Press release Institution visits Grievance mechanism	When required	TPOTC

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	Fisheries Schools within the Project AoI TP-OTC employees	Awareness workshops for fishermen on cetacean conservation, involving NGOs or marine experts Educational posters and materials in schools to promote cetacean conservation among children Training on aligning operations with conservation goals, including noise reduction, cetacean sighting reporting, and emergency response among TP-OTC staff	Awareness trainings/workshops Electronic publications via online/social media and press releases, Educational posters and materials distributed to the schools Informational posters at the Project site	Once during the construction phase	TPOTC
Operation	Project Affected Parties Project Affected People Residents of the people in the Project Area Fisheries Vulnerable groups Local businesses PAPs of Associated Facilities	Transition process from construction and operation phase Introduce operation phase CLOs Introduce role for the operation phase grievances Operation phase E&S issues especially community health and safety Disclosure of LRP	Focus group discussions Workshops Individual meetings Press releases Social media accounts of TPOTC Grievance mechanism	Information disclosure on national and local media Brochures Information banners at the settlements	TPOTC

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	Other Interested Parties (External) and Governmental and Nongovernmental bodies Local businesses	Transition process from construction and operation phase Business opportunities Introduce TPOTC role for the operation phase grievances Operation phase E&S issues especially community health and safety Disclosure of LRP	Press releases Social media accounts of TPOTC Grievance mechanism	Information disclosure on national and local media Brochures	TPOTC
	Fisheries Schools within the Project AoI TP-OTC employees	Awareness workshops for fishermen on cetacean conservation, involving NGOs or marine experts Educational posters and materials in schools to promote cetacean conservation among children Training on aligning operations with conservation goals, including noise reduction, cetacean sighting reporting, and emergency response among TP-OTC staff	Awareness trainings/workshops Electronic publications via online/social media and press releases, Educational posters and materials distributed to the schools Informational posters at the Project site	Annual workshops and training at the Project site Distribution of educational materials annually, preferably at the start of the academic year Electronic publications to be made bi-annually, unless significant changes occur that necessitate more frequent updates	TPOTC

5.3 Timelines and Schedule

Table 5-2 outlines the timelines and engagement tools for effectively communicating with various stakeholder groups throughout the project on regular engagement activities, ensuring that all parties are informed and engaged at appropriate intervals.

Table 5-2: Timelines and Tools for Stakeholder Engagement

Stakeholder	Engagement Tools	Timeframe
Residents living in the Project Aol, PAPs of Associated Facilities	Information boards with post box, leaflets, Regular meetings, visits, focus groups discussions Women only focus groups Grievance mechanism and, Media dissemination Website	Regularly during construction and operation
Land users for agricultural and animal husbandry purposes in the Project Aol, PAPs of Associated Facilities	Information boards with post box, leaflets, Regular meetings, visits, focus groups discussions Women only focus groups Grievance mechanism and, Media dissemination Website	Regularly during construction and operation
Fishermen and Fishery organizations	Information boards with post box, leaflets, Regular meetings, visits, focus groups discussions Grievance mechanism and, Media dissemination Website	Regularly during construction and operation
Vulnerable Groups	Tailored engagement (separate/specific meetings, visits at home, delivery of information documents to home, set up of separate communication groups)	Regularly during construction and operation
General Public (including residents of, and visitors to, the Local Communities)	Information boards, leaflets, website, media reports, public events	Regularly during construction and operation
Businesses in Filyos, Çaycuma and Saltukova	Website, meetings and visits, emails	As needed during construction and operation
Community Services and Infrastructure Organizations	Email, telephone, post and in person Meetings and correspondence	As needed
National and Regional (Local) Government Authorities	Email, telephone, letters Meetings and correspondences	As needed

Stakeholder	Engagement Tools	Timeframe
Local Government and Community Representatives	Email, telephone, letters Meetings and correspondences	As needed
Non-Governmental Organizations (NGOs)	Telephone, emailing, website, press, visits and meetings	As needed
Media and Press	Telephone, e-mails, meetings, website	As needed
Academic and Research Organizations	Telephone, e-mails, visits and meetings, website	As needed or requested
Employees of the Project	Face-to-face meetings, training sessions, newsletters, employee grievance mechanism, surveys	Prior to construction, regular updates during construction

5.4 Stakeholder Engagement Program for 2025

The stakeholder engagement program to be implemented for 2025 is provided in Table 5-3. This program is designed to address the specific interests and concerns of various target groups and outlines a comprehensive plan to ensure continuous and effective communication with all relevant stakeholders.

Table 5-3 Stakeholder Engagement Program for 2025

Target Group	Topics of Interest in the Project	Purpose of Engagement	Engagement Vehicle/Methods	Schedule or Frequency during commissioning and operation	Responsible Person
Residents living in close proximity to Project area PAPs	Project Information on design, schedule, environmental and social impacts of the Project activities Recruitment and Procurement Activities of Project Grievance Mechanism of the Project (Procedures on how to submit grievances and grievance resolution procedures)	Information disclosure on: <ul style="list-style-type: none"> Objective and structure of investment and ongoing construction activities Production and environment technology selected; operational precautions taken Scheduling for commissioning activities, potential impacts on health and safety measures/mechanisms, closure options, socio-economic and cultural impacts of rehabilitation Precautions preventing damages over infrastructure and public and private properties (road, water, electric network, wall, fence, pole, etc.) Precautions against dust, noise, vibration Recruitment of employees Training of staff Procurement of supplies and services Grievance Mechanism Grievance Resolution Process Periodic monitoring of contract implementation with 	Posters Brochures Annual Reports Community Meetings Community Monitoring Media Open door activities	Quarterly meetings and additional meetings as needed	TPOTC

		communities.			
Fishermen and Fishery organizations PAPs	Livelihood impact	<p>Information Disclosure on:</p> <ul style="list-style-type: none"> • Livelihood Restoration Framework • Livelihood Restoration Plan • Livelihood Restoration Completion Audit • Grievance Mechanism <p>Additionally:</p> <ul style="list-style-type: none"> • Regular and timely communication to local fishers and other users of local ports and harbours about construction activities and the routes and frequency of Project vessels will be ensured. • Timely communication of the security zone to local fishermen and other users of local harbours and coordinating the practical consequences of such security zone will be ensured. • A consistent communication channel with the fishery co-operative and local fishers will be conducted to provide updates on project activities and address concerns promptly. 	Community meetings Face to face meetings Community monitoring Committee meetings Grievance mechanism	Weekly, (Until completion) Monthly basis (after completion) and as needed	TPOTC
General Public	Project Information on design, schedule, environmental and social impacts of the Project activities	<p>Information Disclosure on:</p> <ul style="list-style-type: none"> • Project information (non -technical introduction, figures, impacts and management, progress update, restrictions and community safety, grievance mechanism, vacancies and corporate social responsibility projects, operation activities 	Community Meetings Committee Meetings Media Grievance mechanism	Annual meetings and as needed	TPOTC
Non-governmental organizations (NGOs)	Project progress Environmental and social impacts and mitigations Economic and social	<p>Information Disclosure on:</p> <ul style="list-style-type: none"> • Mitigation measures against potential environmental and social risks • Sustainability criteria • Social responsibility projects implementation principles • Description of social needs and determination of priorities 	Meetings with interest groups/ NGOs Sponsorships Workshops Surveys Regular E&S progress update reports through	Annual meetings	TPOTC

	development Corporate social responsibility projects	<ul style="list-style-type: none"> Assessment of existing and required resources Establishment of new partnerships with government, social groups, and key stakeholders in order for development and implantation of sustainable development projects. 	website Posters Media Sectoral fairs and conferences		
Local Government and Community Representatives	Management of environmental and social risks of the Project	Information Disclosure on: <ul style="list-style-type: none"> Environmental monitoring program Environmental monitoring results Overall information about Project impacts Population dynamics Employment Statistics Procurement Statistics 	Meetings Brochures	Quarterly / As needed	TPOTC
Local and National State agencies and relevant authorities	Project activities and schedule Management of environmental and social risks of the Project	Information Disclosure on: <ul style="list-style-type: none"> Project activities and schedule Management and monitoring plans for environment, health and social issues, Closure activities and their effects on local communities Establishment of new partnerships with government, social groups and key stakeholders for development of sustainable development projects 	Meetings with governmental institutions	Biannually and as needed	TPOTC
Businesses in Filyos, Çaycuma and Saltukova	Project activities and schedule Management of environmental and social risks by the Project	Information Disclosure on: <ul style="list-style-type: none"> Project activities and schedule Management and monitoring plans for environment, health and social issues, Closure alternatives and their effects on local communities Establishment of new partnerships with government, social groups and key stakeholders for development and implantation of sustainable development projects 	Meeting with governmental institutions	Biannually and as needed	TPOTC

Academic and Research Organizations	Project activities Management of environmental and social risks of the Project	Information Disclosure on: <ul style="list-style-type: none"> • Project activities and schedule • Management and monitoring plans for environment, health and social issues 	Press conferences Press releases Printed and visual media	Biannually and as needed	TPOTC
Vulnerable Groups	Project activities Management of environmental and social risks of the Project Grievance mechanism Employment opportunities Special assistance to be provided by the Project Corporate social responsibility projects Any other interest of vulnerable groups	Information Disclosure on: <ul style="list-style-type: none"> • Capacity development program for local people through targeted training programs internally and with key external training partners • Use of roads, water and other infrastructure, increase in traffic density • Air, vibration, noise and dust emissions, visual impact • Local employment • Youth inclusion 	Planned meetings with vulnerable groups in the settlements Women-only meetings Workshops Individual and community meetings Focus group discussions Leaflets and brochures	Quarterly / As needed	TPOTC

Project employees	Employee wellbeing	Information Disclosure on: <ul style="list-style-type: none"> • Employee Grievance Mechanism • Labour rights • OHS procedures • Contractor management for contractor employees 	Bulletin Face to face interviews OHS Committee Trainings Company social events for employees Committee labour audits/reviews Employee Grievance Mechanism	Monthly / As needed with the grievance	TPOTC
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6.0 GRIEVANCE MANAGEMENT

A grievance mechanism is implemented to ensure that TP-OTC is responsive to any concerns and complaints particularly from affected stakeholders and communities. Special care placed on the training of the designated staff involved in the management of the grievance mechanism. The grievance mechanism is open and accessible to all individuals and groups. TPAO is consulted for grievances that are related to expropriation.

The Project has a transparent and unbiased grievance mechanism to:

- identify issues and concerns as early as possible to address them timely and proactively
- continuously improve Project performance
- demonstrate Project’s commitment to meaningful stakeholder engagement, and respect for stakeholders’ opinions and concerns.

6.1 PRINCIPLES

The Project has a grievance procedure based on following key principles:

- Any person or organization can express concerns, complaints, and grievances at any time, without fear of retribution and retaliation.
- All grievances are treated in a fair and respectful manner.
- When a grievance is received, TP-OTC will respond to the stakeholder to confirm its receipt within five (5) business days. At this time, the stakeholder will also be provided information about response times, next steps, and a contact within the team. The target is to resolve grievances within 30 calendar days.
- The process (receive, investigate and resolve) is consistent and transparent.
- Information about a grievance (and related investigations and decisions) is documented.
- Personal information about the affected stakeholders is treated as confidential. TP-OTC respect other confidentiality requests as needed. Submission of anonymous grievances shall be allowed. The grievance mechanism also receives complaints related to gender-based violence, sexual harassment and sexual exploitation and abuse (GBV-SHSEA).
- The related to project activities, project management, TP-OTC activities or contractor including sub-contractor activities can be submitted through grievance mechanism.

The steps that are followed for the resolution of grievances is shown in the diagram in Figure 6-1.

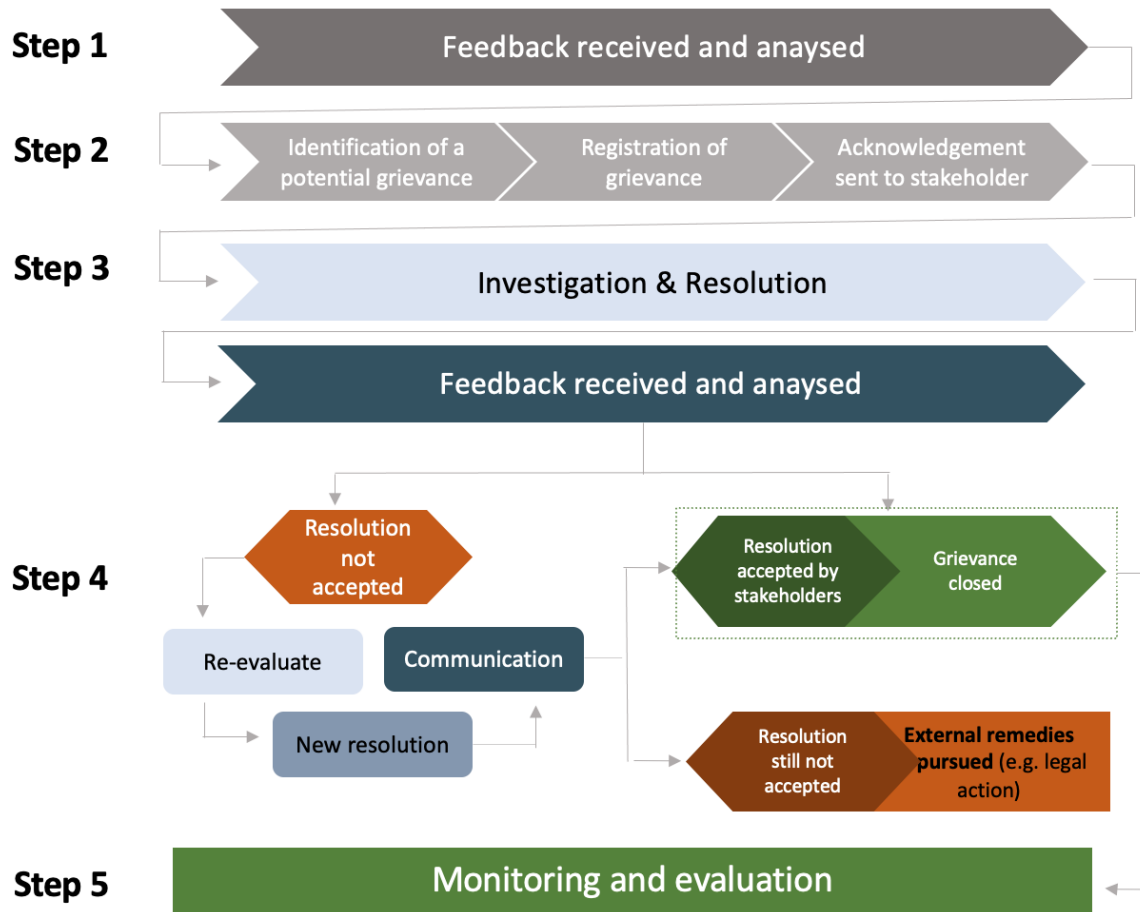


Figure 6-1: Diagram of GRM

A separate, but similar internal grievance procedure is implemented for workers, including Staff, employees of TP-OTC, its contractors and sub-contractors, suppliers, and customers.

6.2 PROCESS

Social Impact Management Team is the main responsible for execution of Grievance Mechanism. Appeals Committee will oversee grievance management overall and will ensure that the grievances are resolved and monitored effectively. Grievances are managed through a software (SAP) by Social Impact Specialist and CLO to close communication with Investigation Team including TP-OTC Engagement and Communication Senior Expert, CLO, TP-OTC information office public relations staff who also acts as complaint registrar, TP-OTC environmental expert, site management representatives (onshore and offshore), contractor and supplier management representatives. These core team conducts initial assessments and involve other technical staff for resolution and response. Social Impact Specialist is responsible for following up resolution and responses. TPAO is involved in issues related to expropriation.

Employee grievances are separately managed and forwarded to human resources after registered in the software (SAP).

Step 1 – Feedback received: Stakeholders can convey their feedback related to the Project in many ways; verbally during a meeting, via website, email, call, or official correspondence etc. In either way, Social Management Team will ensure that it is documented, incorporated, and responded to as needed. In some cases, this process may identify a grievance. If so, Step 2 is initiated. Social Management Team will response the enquiries in five (5) business days.

Step 2 - Grievance logged: When a grievance is identified, it is officially registered in the software and given a unique identification number. Grievance Form is filled out for each grievance (Annex A). This form consists of complainants contact information and details of the complaint. It is categorized based on the type of complaint and its severity. The main complaint issue categories are as follows³:

- Social Impact
- Environmental Impact
- Compliance Impact
- Community Security
- Human Rights

List of grievances subcategories are presented in the Annex-C.

Following the registration of the grievance, an initial response is sent to the person(s) who raised the grievance including the registration number for follow-up, acknowledging their feedback, and describing the next steps in the grievance process, time estimates for these steps and a contact person. Apart from the official mechanism, the complaints arising from the contacts are added to the log with a different code than the complaints received through the official mechanism. These complaints are also being made a part of the process with the same method.

Step 3 - Investigation and resolution: Investigation Team investigates grievances and their surrounding circumstances if necessary. These investigations are undertaken in a timely manner involving further staff and experts if necessary. The results of these investigations are reviewed, and a resolution is proposed. The development of the resolution may involve consultation with the person(s) involved and in some cases with an independent third party. Grievances regarding human rights violations, Gender Based Harassment, and wrong doings will be evaluated by Appeals Committee. The proposed resolution is then formally communicated to all parties. Social Management Team completes the process and respond to the complainant in 30 calendar days.

Step 4 - Resolution: If the resolution is accepted by all parties, it is implemented, and the grievance is closed using Grievance Closure Form (Annex B). If the resolution is not accepted, it will be reconsidered, and a revised resolution may be proposed. The affected person(s) may choose to pursue external remedies at any time, including if an agreed resolution cannot be found.

Step 5 - Monitoring & Evaluation: After the resolution has been implemented, it is monitored, and its effectiveness will be evaluated. All parties are notified that the resolution has been implemented and have the opportunity to provide feedback on the grievance process and its implementation.

³ Categories are subject to update along the process.

6.3 INSTITUTIONAL SET UP AND RESOURCES

Social Management Team composed by Social Impact Specialist and CLO. The team has the main responsibility of execution of this plan including delivery of activities and overall management of relations with stakeholders, grievance management and monitoring and evaluation. This core team will be supported by Investigation Team.

Appeals Committee consisting of **TP-OTC Corporate Communications Department**, TP-OTC HSSE and HR management is responsible for ensuring Grievance Mechanism is effectively managed. Furthermore, the committee will directly investigate and respond grievances related to human rights violations, mobbing, Gender Based Harassment, and wrong doings (bribery, actions against business integrity principles) as well as grievances that are not closed when complainant refuses the corrective actions, or the actions are not closed on time.

Action Team

- HSSE Team
- Site Management Representatives
- Onshore and Offshore Construction Team
- Contractor
- Supplier Management Representative

Appeals Committee

- **Vice President**
- HR Coordinator
- Corporate Communications Coordinator
- HSSE Coordinator
- Communications, Regulations & Reporting Specialist

Social Management Team

- Social Impact Specialist
- CLO

6.4 Contact Information

In order to ask a question, to make a comment and to complaint, stakeholders may reach to TP-OTC by using following methods:

- Direct contact with CLO and Social Impact Specialist: Contact information is given in Table 6-1.
- Contacting the Project Information Office: Address of the office is Yeni Mah. Oktay Olcay Yurtbay Cd., 67900 Çaycuma/Zonguldak
- Grievance boxes locate in affected settlements and fishery cooperative: Grievance boxes are located in Sefercik, Sazköy and Derecikören neighbourhood unit, Aşağıhsaniye Mosque, Derecikoren, Yeşilyayla Mosque, Gökçeler Mosque and Filyos Fisherman's Shelter.
- Accessing the Project website: <https://tp-otc.com/en/contact/>

Table 6-1 Contact Information

Name of the Person and Title	Contact Information
Casim Can Hindioğlu Social Impact Specialist	0531 651 41 48 cchindioglu@tp-otc.com
Şeyma Yılmaz Community Liaison Officer	0531 886 46 82 seyilmaz@tp-otc.com

6.5 REPORTING (Monitoring)

Both public and worker grievances will be reported according to the following criteria.

- Total number Grievances
- Breakdown the number of grievances:
 - By status (open, in progress, resolved, closed for SAP)
 - By complainant location
 - By the location of the grievance
 - By status of the complainant (Real Person / Institution / NGO / Anonymous etc.) in Public GRM
 - By grievance issue main category and sub-category
- Grievance holder's contact information
- Key word-based reporting

7.0 ROLES AND RESPONSIBILITIES

Organization chart of the Project is given in Figure 7-1.

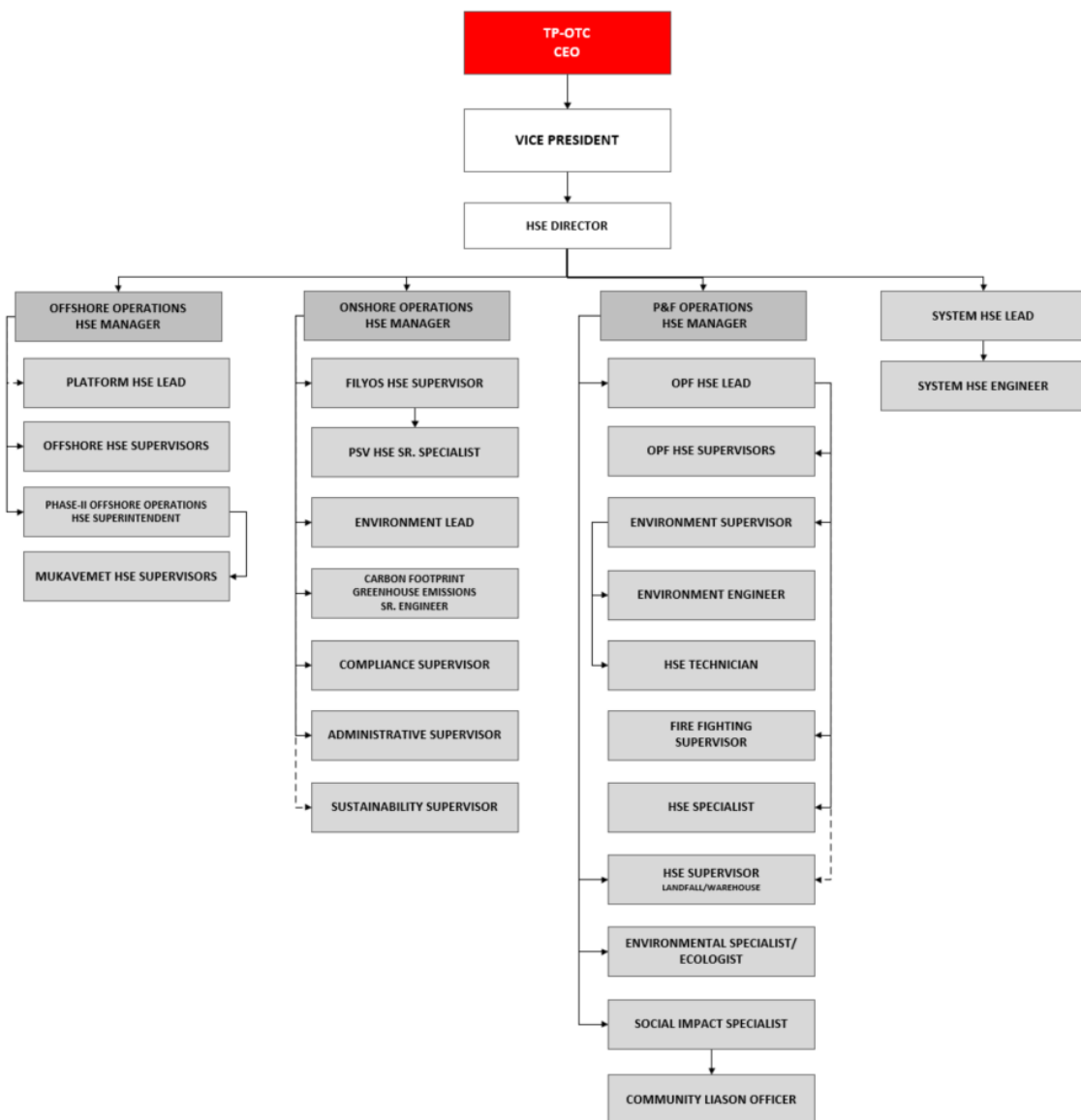
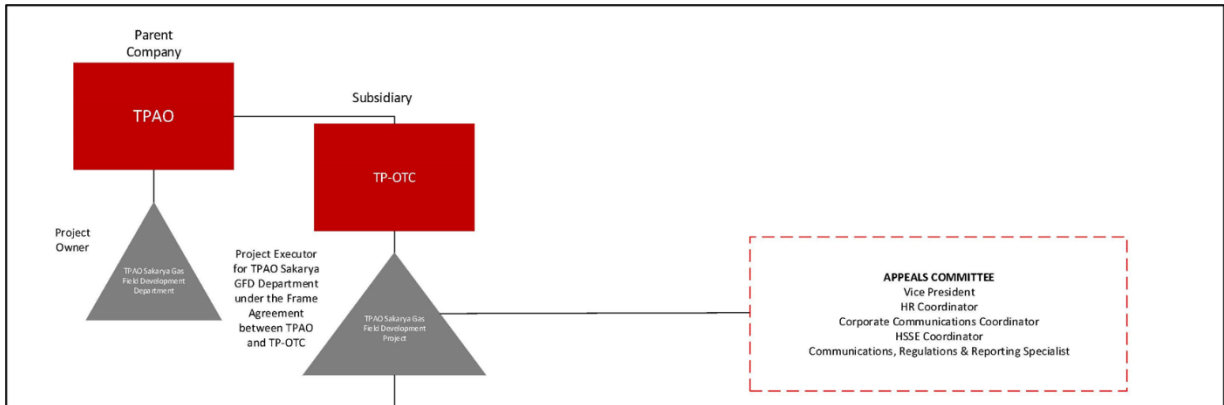


Figure 7-1 TP-OTC Project Organization Chart

During the construction and operation phases of the Project, the following roles and responsibilities will be implemented by TPOTC.

Table 7-1: Roles and Responsibilities

Role	Detailed Responsibilities
Top Management	<ul style="list-style-type: none"> Managing the labour force, enhancing working conditions, providing resources for personnel training, and ensuring that performance assessments are being conducted;
Project Manager	<ul style="list-style-type: none"> Monitoring the correct and effective implementation of this SEP Overall responsible for ensuring the implementation of all environmental and social management plans Ensure the financial and required human resources required for the implementation of ESMS Assist the site manager and CLO when required
Site Manager	<ul style="list-style-type: none"> Ensure the implementation of all ESMS, including the SEP Monitor the performance of the Contractors Monitor the weekly reports of the CLOs and the grievance records
Site Environment, health, and safety (HSE) Specialist/ Manager	<ul style="list-style-type: none"> Monitors relevant legislation and update the current ESMS according to the actual legislation Conduct internal audits/site audits Manage external audits Determines corrective measures if necessary Identifies the need for OHS and Environmental training Ensures that checks and audits on equipment, machinery and materials are periodically conducted and that records and archives are kept and ready to be presented to the authorities Checks the OHS records and performance reviews of contractors Checks the Environmental records and performance reviews of contractors Examines the environmental management plans and preparations Monitors the permits and notices regarding OHS and Environment and ensures that the necessary permits are obtained
Corporate Communication Manager	<ul style="list-style-type: none"> Review the Grievance tracking system weekly Prepare monthly reports on the grievances and the stakeholder engagement activities monthly Report to Project manager Work in cooperation with other departments to determine targets for Environmental, Social, health and safety issues

Role	Detailed Responsibilities
Social Impact Specialist	<ul style="list-style-type: none"> • Ensure all complainants are informed within one week and complaints are resolved within one month • Provide regular reporting back to the community on grievances • Record all formal and informal engagement activities with local communities and relevant all stakeholders. This will include interactions with committee fisheries and relevant stakeholders. • Monitoring of the Contractors of the associated facilities • Monitor and record the social responsibility activities carried out in the scope of the Project, • Organizing stakeholder meetings if needed. Regular feedback to the stakeholders about the result of their grievances through Closing Form within 30 calendar days (Complainants who have provided their names and contact info will be notified within seven days that the grievance solution process has started). • Keeping the record of the grievances in the Grievance Database with details (raised by who, date, status (open, awaiting or closed) etc.); • Supporting HSE Manager on the first evaluation of the relevance of grievances collected • Ensure all complainants are informed within one week, and complaints are resolved within one month • Provide regular reporting back to the community on the community grievances
Spokesperson	<ul style="list-style-type: none"> • Communicating with the media and public, • Writing press releases • Prepare presentations related with the Project
Community Liaison Officers	<ul style="list-style-type: none"> • Record all formal and informal engagement activities with local communities in the stakeholder management system • Keep records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted into stakeholder engagement quarterly reports • Monitor and record the social responsibility activities carried out in the scope of the Project, and these records will be inserted into stakeholder engagement quarterly reports • Being in contact with stakeholder meetings to collect the responses to grievances actively
Subcontractor	<ul style="list-style-type: none"> • Contractors/Subcontractors are responsible for not making any commitment in their interaction with the stakeholders beyond their competence. They will follow the rules listed in this SEP and other relevant management System documentation.

8.0 MONITORING

The stakeholder engagement process of the Project will be monitored periodically. According to the outputs of the monitoring indicators, the SEP will be updated, and the necessary corrective actions will be implemented during the different stages of the Project by the Project CLO. The monthly summaries, statistics of the consultation activities and grievances will be provided to the top management by the CLOs.

Monthly summaries will be used to assess:

- Transparency and accessibility of the engagement process,
- Provision of relevant information,
- Timeliness in responding (ongoing communication),
- Clarity and simplicity of the information provided,
- Project impacts; and
- Applicability and relevance of the information provided.

The SEP will be reviewed annually and updated according to the outputs of the monitoring process. The key performance indicators for an effective stakeholder engagement process that will be assessed during the monitoring process are presented in Table 8-1.

Table 8-1: Key Performance Indicators (KPIs)

ID	KPI	Target	Monitoring Measure	Frequency
Consultation and Information Disclosure				
SEP-KPI-01	Registration of stakeholder engagement	Target of 100%	Database	Weekly
SEP-KPI-02	Consultation records Materials shared with the stakeholders (brochure, presentations) Number of the meetings held Number of the participants who attended the public consultation meetings Visits to local authorities or other local stakeholders Frequency of the visits to the settlements affected by the Project Number of newspapers to share the information Any updates on the Project website Any type of announcements (information banners, calls)	Delivery of regular reports on the consultation activities 100%	Reporting	Weekly/Monthly
Implementation of Grievance Mechanism				

ID	KPI	Target	Monitoring Measure	Frequency
SEP-KPI-03	Number of community complaints/grievances received	The total number reduced per year	Log/Database	Weekly
SEP-KPI-04	Percentage of complaints resolved in less than 30 days	70%	Log/Database	Monthly
SEP-KPI-05	Percentage of conflicts and social tensions resolved per total amount of conflicts and social tensions	100%	Log/Database	Weekly
SEP-KPI-06	Reporting back to stakeholders in the implementation of the grievance mechanism	Delivery of regular reports to stakeholders on the outcomes of the Grievance Procedure 100%	Reporting	Monthly
SEP-KPI-07	Auditing the grievance mechanism to ensure that it is being implemented and that grievances are being adequately addressed	Biannual (construction), annual (operation) 100%	Audit report	Quarterly
SEP-KPI-08	Disclosure of Project's annual Environmental and Social Monitoring Report	Project's annual Environmental and Social Report will be disclosed	Annual Report	Annually
SEP-KPI-09	Legal Penalty	Zero Penalty (Penalties are given by the authorities in case of non-compliance.)	Reporting	Monthly

9.0 DOCUMENTATION AND REPORTING

9.1 Documentation

Stakeholder engagement activities will be documented and filed to ensure accountable delivery of this SEP and open reporting. The following documentation will be used and maintained by TP-OTC during pre-construction, construction, and operation phases:

- Stakeholder dialogue log,
- Meeting minute template,
- Stakeholder list,
- Grievance log,
- Media monitoring.

Records will be reviewed on a monthly basis to ensure that records are being used and maintained. Commitments and actions recorded during community interaction activities will also be regularly reviewed to ensure they are taken forward.

9.2 Reporting

9.2.1 Internal Reporting

During construction monthly reports will summarize all activity for the period and provide a summary of issues raised and how they have been addressed, including timeliness of responses and corrective and mitigation measures to address grievances and analysis of trends in audit activities Internal reporting will be performed biannually during the operation phase.

The Project will also have various detailed internal reporting and Social Management Team will provide input to these including activities realized, outcomes and feedback of stakeholders, grievance management. These include:

- Weekly reporting to top management
- Annual reporting to top management
- Other ad-hoc reporting requirements

9.2.2 External Reporting

The Social Management Team will be reviewed on a regular basis and revised as needed to reflect completed engagement activities and revise and confirm future engagement plans. During the construction phase of the Project, regular reporting to local communities will be ensured through regular meetings with the mukhtars and annual reports on Project progress, implementation of mitigation measures, compliance with ESMS and overall performance. During the meetings with the mukhtars, disclosure forms are filled and signed, and this process will continue to be followed in future stages of the Project. During the operation phase, the Project will continue to provide updates as necessary. The Project anticipates providing information to stakeholders which will focus on non-routine activities, after an unplanned event or incident (if one occurs), or if there is a change to Project personnel who act as stakeholder focal points.



The SEP will be updated annually, and updated SEP will be disclosed publicly both in Turkish and English through the Project website at the following link: (<https://tp-otc.com/en/sustainability/sgs-social-policy-and-communication/>). The SEP can be shared with the interested stakeholders electronically, when required.



OTC OFFSHORE
TECHNOLOGY
CENTER

SAKARYA GAS FIELD DEVELOPMENT PROJECT
STAKEHOLDER ENGAGEMENT PLAN

ANNEX A - GRIEVANCE FORM (Front Page)

 TÜRKİYE PETROLLERİ ANONİM ORTAKLIĞI	ŞİKAYET KAYIT FORMU GRIEVANCE FORM	 OTC OFFSHORE TECHNOLOGY CENTER	Doküman No / Doc. No	GR.001
			Yayın Tarihi/Issue Date	20.04.2022
			Revizyon No/Rev. No	0
			Revizyon Tarihi/Rev.Date	0
Sayfa No/Page Number	1			
1- ŞİKAYETTE BULUNAN KİŞİYE İLİŞKİN BİLGİLER / INFORMATION OF COMPLAINANT				
Ad Soyad: <small>(Eğer isimsiz olarak şikâyetinde bulunmak istiyorsanız, lütfen İSİMSİZ yazınız – Belirttiğiniz tüm görüşleriniz dikkate alınacaktır.)</small>		Tarih/Date :		
Full Name <small>(If you prefer to remain anonymous please write ANONYMOUS – your comments will still be considered)</small>		Şikâyet nasıl alındı? How is the grievance received?		
İletişim bilgisi <small>Lütfen ne şekilde irtibata geçilmek istediğinizi işaretleyiniz</small> <small>(Posta, telefon, e-posta)</small>		<input type="checkbox"/> Şahsen/Personally		
Contact information <small>Please mark how you prefer to be contacted</small> <small>(mail, telephone, email)</small>		<input type="checkbox"/> Telefonla / Phone line		
		<input type="checkbox"/> Dilekçe / Petition		
		<input type="checkbox"/> E-posta yoluyla / e-mail		
		<input type="checkbox"/> Diğer (Lütfen Belirtin)		
Adres / Adress :				
E-posta / E-Mail :			Telefon/Telephone :	
2- ŞİKAYET HAKKINDA BİLGİ (Lütfen şikâyetiniz anlatınız) / INFORMATION ABOUT GRIEVANCE (Please, describe the grievance)				
Şikâyet sahibi tarafından talep edilen çözümler / Grievance Prevention Measures from Complainant				
Şikâyetin alındığı tarih ve Numarası Türü: <small>Date of Incident/Grievance Received & Number</small>				
Olay/Şikâyet Sıklığı/ <small>Frequency of Incident/Grievance</small>		<input type="checkbox"/> Bir defa / One-time grievance		
		<input type="checkbox"/> Birden fazla (Kaç kez tekrarlandı?.....) / Did it happen more than once (how many times?.....)		
		<input type="checkbox"/> Devam ediyor (Sorun hali hazırda sürüyor) / On-going (currently experiencing problem)		
Şikâyet Sahibinin Ad Soyad ve İmzası: <small>Name and Signature of Complainant</small>			Kayıt Eden Kişinin Ad Soyad ve İmzası: <small>Name and Signature of Registerer</small>	

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SAKARYA GAS FIELD DEVELOPMENT PROJECT
STAKEHOLDER ENGAGEMENT PLAN

GRIEVANCE FORM (Back Page)

 TÜRKİYE PETROLLERİ ANONİM ORTAKLIĞI	ŞİKAYET KAYIT FORMU GRIEVANCE FORM	 OTC OFFSHORE TECHNOLOGY CENTER	Doküman No / Doc. No.	GR.001
			Yayın Tarihi/Issue Date	20.04.2022
			Revizyon No/Rev. No.	0
			Revizyon Tarihi/Rev. Date	0
			Sayfa No/Page Number	1
Şikayetinizi bize/You can convey your complaint to us via;				
1. Etkilenen yerleşimlerde ve balıkçılık kooperatifinde bulunan şikayet kutularına erişerek* (By accessing grievance boxes in affected settlements and fishing cooperative)				
2. Proje Bilgi Ofisi ile iletişim kurarak** (By contacting the Project Information Office)				
3. Proje web sitesine erişerek*** (By accessing our website)				
4. Halkla İrtibat Görevlisi veya Sosyal Etki Uzmanı ile doğrudan iletişim kurarak iletebilirsiniz. (You can communicate directly with the Community Liaison Officer or Social Impact Specialist)				
* Şikayet kutuları Sefercik Mahallesi Muhtarlığı, Sazköy Muhtarlığı, , Aşağıhsaniye Camii, Derecikören Muhtarlığı, Yeşilyayla Camii, Gökçeler Camii ve Filyos Balıkçı Barınağı'nda bulunmaktadır. (Complaint boxes are located in Sefercik, Sazköy and Derecikören neighbourhood unit, Aşağıhsaniye Mosque, Derecikören, Yeşilyayla Mosque, Gökçeler Mosque and Filyos Fisherman's Shelter.)				
** Bilgi Ofisi Adresi/Information Office Address : Yeni Mah. Oktay Olcay Yurtbay Cd., 67900 Çaycuma/Zonguldak'ta bulunmaktadır.				
*** Websitesi: https://tp-otc.com/en/contact/				
Kişinin Adı ve Ünvanı /Name of the Person and Title	İletişim Bilgisi /Contact Information			
Casim Can Hindioğlu	0531 651 41 48			
Sosyal Etki Uzmanı/Social Impact Specialist	schindioglu@tp-otc.com			
Şeyma Yılmaz	0531 886 46 82			
Toplumsal İrtibat Görevlisi/Community Liaison Officer	seyilmaz@tp-otc.com			

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ANNEX B – FEEDBACK PROCESS AND GRIEVANCE MECHANISM



Share Your Feedback

Within the scope of the Sakarya Gas Field Development Project, we meticulously seek to establish a transparent and constructive dialog with our stakeholders. For this purpose, we have established a Feedback and Grievance Mechanism to ensure that comments, suggestions and complaints regarding our project can be communicated to our company. Within the scope of this mechanism, all comments, suggestions and complaints submitted to our company are recorded and duly assessed.

The easiest way for you to report your feedback to us through the Feedback and Grievance Mechanism is to fill out the form in the brochure and drop it in the Feedback and Grievance boxes in the mukhtars' offices, or contact our Community Liaison Officer Şeyma Yılmaz and/or Social Impact Specialist Casim Can Hindioglu.

Şeyma Yılmaz
Sakarya Gas Field Development Project
Community Liaison Officer
Phone: 0531 886 46 82
E-mail: seyilmaz@tp-otc.com

Casim Can Hindioglu
Sakarya Gas Field Development Project
Social Impact Specialist
Phone: 0531 651 41 48
E-mail: cchindioglu@tp-otc.com

You can also send your comments, suggestions and complaints to TPAO via e-mail or mail: sakaryabilgi@tpao.gov.tr

TPAO Genel Müdürlüğü, Sığürtüzü Mahallesi, Nizami Gencevi Caddesi No:10, 06530, Çankaya-Ankara/Türkiye

Feedback Process

We care about the participation of the local community at every stage of our project and aim to establish effective and transparent communication with all our stakeholders based on mutual trust. In this regard, we have established a Feedback Process, through which anyone affected by the project can submit their questions, comments, information requests, concerns and complaints.

You can send us your feedback in person, by phone, by e-mail, by post or by using the Feedback and Grievance boxes. We carefully evaluate all feedback that we receive, and prepare our responses in line with the principles of open and honest communication.

Within the scope of the Feedback Process:

- We document all feedback;
- We forward them to the relevant units within the organization;
- We take the feedback into consideration during the planning and implementation phases of the Project;
- We respond to feedback when necessary.

We work together with all relevant units of our project while evaluating all positive and negative comments and complaints that we receive as part of the feedback process. The processes of drafting responses and resolving complaints are carried out within the scope of the Grievance Mechanism within our company.

SAKARYA GAS FIELD DEVELOPMENT PROJECT

FEEDBACK PROCESS AND GRIEVANCE MECHANISM

SAKARYA GAS FIELD DEVELOPMENT PROJECT

A total of 540 billion m³ of natural gas has been discovered so far in the exploration works carried out by Türkiye Petrolleri Anonim Ortaklığı (TPAO) in the ultra-deep waters of the Black Sea. **Sakarya Gas Field Development Project** consists of a natural gas production system established under the sea, a processing facility constructed on the shore of Filyos, and pipelines connecting these two units.

 **TURKISH PETROLEUM** 

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FEEDBACK AND GRIEVANCE FORM

Name-Surname:

You may share your opinions, suggestions and complaints with or without mentioning your name. If you would like to submit an anonymous complaint, please write "ANONYMOUS". All feedback will be taken into account.

Date:

How would you like us to reach you?

Address:

Phone:

E-mail:

Your preferred language for communication:

Turkish English

Please summarize your question, comment or concern. For complaints, please see below.
.....
.....

Please describe the incident subject to complaint.

Date of the incident:

Place of the incident:

How many times did this incident or situation occur?

Once (Please specify date)
.....

More than once (Please indicate how many times it has happened)
.....

Ongoing (Still taking place; please explain)
.....

Is this your first complaint about the project?

Yes No

If not, how many times have you filed a complaint before?
.....

How do you think the problem can be solved?
.....
.....

If available, please include other information that may be relevant to the incident/complaint (such as photographs and other documents).

Your personal information will be saved for data analysis and response to your grievance within the scope of TPAO's stakeholder engagement. The information you provide may be shared with other parties within the scope of the project when necessary to resolve your grievance, but will not be shared with third parties. Your personal information will be withheld in the case of transmitting information to parties not involved in the resolution of complaints. You can contact our company at any time to access your personal information and to correct your personal information that you think is not correct.



GRIEVANCE MECHANISM

We refer to any problem reported regarding the activities of the Sakarya Gas Field Development Project as a 'complaint'. The complaint in question may be related to an undesirable incident, impacts on the environment, or the attitudes and behaviors of the staff working for the project. We have established the **Grievance Mechanism** to ensure that these issues are handled through a transparent and impartial process.

HOW DOES THE GRIEVANCE MECHANISM WORK?

1 GET FEEDBACK

Questions, comments and feedback about the project are received. All questions and comments are recorded and (if needed) answered as part of the feedback process. In this process, feedback that should be classified as a complaint may be detected. In that case, the second stage of the Grievance Mechanism starts.

2 THE COMPLAINT IS RECORDED

When a complaint is detected, it is classified according to its type and impact, and recorded accordingly. A response confirming that the complaint is received, which also explains the steps to be taken within the grievance system, is sent to the owner of the complaint within five (5) business days.

3 REVIEW AND RESOLUTION

The complaint in question and the circumstances leading up to it are examined and a solution is proposed. While identifying the solution, the relevant person or persons may be consulted. The proposed solution is then formally communicated to the related parties. This step is completed within thirty (30) calendar days.

4 SOLUTION ACCEPTED (OR NOT)

If the solution is accepted by all parties, it is brought into implementation and the complaint file is closed. If the solution is rejected, it may be reconsidered and a different solution may be offered. Complaint files whereby the proposed solution is not accepted are referred to the Appeals Committee. The person(s) impacted by the project may choose to pursue other legal means at every stage, including the cases where no agreed solution is found.

5 MONITORING AND EVALUATION

Once the accepted solution is implemented, it is monitored and its effectiveness is assessed.

MAIN OBJECTIVES OF THE GRIEVANCE MECHANISM

- Ensuring that we identify issues and concerns at an early stage so that we can address them quickly and effectively;
- To continuously improve the performance of the project in all areas;
- Demonstrating our commitment to meaningful stakeholder engagement and our respectful approach to local views and concerns.

BASIC PRINCIPLES OF THE GRIEVANCE MECHANISM

- Every person and organization can report their concerns, demands and complaints at any time.
- All complaints are dealt with seriously by our company and evaluated fairly with respect.
- When a complaint is received, the relevant party is notified of its acceptance within **five (5) business days**. In this step, response times, next steps, and information about a contact person within the company are provided to the relevant party.
- The complaints are received, investigated, and resolved through a consistent and transparent process.
- Information on all complaints are recorded and documented.
- The investigation work regarding the complaint is completed within thirty (30) calendar days and delivered to the relevant party with a solution proposal.
- The personal information of the impacted stakeholders remains confidential. In addition, due attention is paid to other confidentiality requests when necessary.
- Complaints may be related to the construction and operation phases, activities carried out for the Sakarya Gas Field Development Project, our company or contractor companies.
- Affected stakeholders can prefer to take legal action.

CONTACT US

You may send us your questions, concerns and complaints at any time.

You may share your opinions, suggestions and complaints with or without mentioning your name. If you would like to submit an anonymous complaint, please write "ANONYMOUS". All feedback will be taken into account.

You can use one of the following ways to contact our company:

- You can contact **Şeyma Yılmaz**, the Community Liaison Officer of the project. You may call **+90 531 886 46 82** or send an e-mail to **seyilmaz@tp-otc.com** to contact Ms. Ünsal.
- You can contact **Casim Can Hindioğlu**, the Social Impact Specialist of the project. You may call **+90 531 651 41 48** or send an email to **cchindioğlu@tp-otc.com** to contact Mr. Hindioğlu.
- You can also send us your suggestions or complaints in writing. You may fill in the attached feedback form or write a letter, and send it to us by mail or drop it in the Feedback and Grievance boxes around the town. Please do not forget to include your contact information for us to be able to respond to your feedback.

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ANNEX C - GRIEVANCE CLOSURE FORM

TÜRKİYE PETROLLERİ ANONİM ORTAKLIĞI		ŞİKAYET KAPANIŞ FORMU GRIEVANCE CLOSURE FORM		OTC OFFSHORE TECHNOLOGY CENTER	
Doküman No / Doc. No:		GR.001			
Yayın Tarihi/Issue Date:		20.04.2022			
Revizyon No/Rev. No:		0			
Revizyon Tarihi/Rev. Date:		0			
Sayfa No/Page Number:		1			
Şikâyet Kayıt Numarası Şikâyet formunda yazılanla aynı olmalıdır Grievance Form Registration No Should be same as in the grievance form		GR-			
Tarih Date					
Şikâyetin Özeti Grievance Summary					
Talep edilen acil eylemleri belirtiniz Indicate the required urgent activities					
Talep edilen uzun dönem eylemleri belirtiniz Eğer Varsa Indicate the required long-term necessary activity If necessary					
Tazminat talep edildi mi? Is compensation requested?		Evet /Yes () Hayır / No ()			
FAALİYETİN DOĞRULANMASI VE SONLANDIRILMASI					
Aşamalar/Stages	Sonlandırılma Tarihi / Termination Date			Sorumlu Bölüm/Responsible Department	
1					
2					
3					
GRIEVANCE / REQUEST COMPLETION					
Notlar /Notes:					
Tarih / Date :					
Şikâyet Sahibinin Ad Soyad ve İmzası: Name and Signature of Complainant			Kayıt Eden Kişinin Ad Soyad ve İmzası: Name and Signature of Registerer		

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ANNEX D – SUB CATEGORY OF GRIEVANCES

Social Impact Sub Category	Environmental Sub Category	Compliance Impact Sub Category	Community Security Sub Category	Human Rights Sub Category
Livelihood	Natural hazards	Unauthorized clearing	Violence on site	Employee misconduct
Resettlement	Contamination - water	Third party risks	Breach of Human Rights	Vulnerability
Stakeholder engagement	Contamination - soil	Noncompliance with lender requirements	Security Personnel on site	Gender
Cultural heritage	Noise and dust			
Community health and safety	Landscape			
Employment	Poaching			
Workers' Health and Safety	Wildlife disturbance			
Community trust	Water quantity			
Procurement opportunities				
Damage to Animal				
Damage to House				
Damage to Land & Crop				
Access to the Lands and Resources				
Expropriation				
Damage to Infrastructure (Road etc.)				



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ANNEX E – ESIA FEEDBACK FORM

ESIA Feedback Form ÇSED Geribildirim Formu	
Name-Surname Ad-Soyad <i>If you prefer or request not to disclose your identity to third parties without your consent, you can remain anonymous.</i> <i>Kimliğinizi izniniz olmadan üçüncü şahıslara açıklamamayı tercih ederseniz veya talep ederseniz, anonim kalabilirsiniz.</i> Optional / Tercihe bağlı	
Address (Adres) <i>Province/District/Settlement</i> <i>İl/İlçe/Yerleşim</i>	
Phone Number (Telefon numarası)	
Date (Tarih)	
Concerns, expectations, questions, or complaints on the ESIA report ÇSED raporu ile ilgili endişeler, beklentiler, sorular veya şikayetler	