



Akköy Wind Power Plant (WPP) Project - Environmental and Social Impact (ESIA) Assessment

Stakeholder Engagement Plan

September 2024

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List of Acronyms

| Term | Definition |
|-----------------|--|
| AQMP | Air Quality Management Plan |
| BAP | Framework Biodiversity Action Plan |
| CHA | Critical Habitat Assessment |
| CLO | Community Liaison Officer |
| ÇEKÜL | Foundation for the Protection and Promotion of Environmental and Cultural Values |
| DSI | State Hydraulic Works |
| E&S | Environmental & Social |
| EBRD | European Bank for Reconstruction and Development |
| EIA | Environmental Impact Assessment |
| EKAD | Ecological Research Society |
| Enerjisa Üretim | Enerjisa Üretim Santralleri Anonim Şirketi |
| EP | Equator Principles |
| EPDK | Energy Market Regulatory Authority |
| EPFI | Equator Principles Financial Institutions |
| ESIA | Environmental and Social Impact Assessment |
| ESPP | Environmental and Social Policy and Procedures |
| ETL | Energy Transmission Line |
| ESMS | Environmental and Social Management System |
| GBVH | Gender-Based Violence and Harassment |
| GM | Grievance Mechanism |
| HR | Human Resources |
| HRIA | Human Rights Impact Assessment |
| IFC | International Finance Corporation |
| IFIs | International Financial Institutions |
| LA | Land Acquisition |
| LCPP | Local Content and Procurement Procedure |
| MoAF | Ministry of Agriculture and Forestry |
| MoCT | Ministry of Culture and Tourism |
| MoEU | Ministry of Environment and Urbanization |
| MoEUCC | Ministry of Environment, Urbanization and Climate Change |
| MoENR | Ministry of Energy and Natural Resources |
| MoLSS | Ministry of Labour and Social Security |
| MoTI | Ministry of Transport and Infrastructure |
| NGO | Non-governmental Organization |
| NMP | Noise Management Plan |
| NTS | Non-Technical Summary |
| PAP | Project Affected Person/People |
| PDoEUCC | Provincial Directorate of Environment, Urbanization and Climate Change |
| PR | Performance Requirements (EBRD) |

| Term | Definition |
|-------------|--|
| PS | Performance Standards (IFC) |
| RRA | Retrospective Resettlement Assessment |
| REC | Resource, Environment and Climate Association |
| RF | Resettlement Framework |
| QMP | Wastewater Management Procedure |
| SEFIA | Association for Sustainable Economics and Finance Research |
| SEP | Stakeholder Engagement Plan |
| TEİAŞ | Turkish Electricity Transmission Corporation |
| TEMA | Türkiye Foundation for Combating Erosion, Afforestation and Protection of Natural Assets |
| TMP | Traffic Management Plan |
| TS | Transformer Substation |
| TUÇEV | Turkish Environmental Protection Foundation |
| WWTP | Waste and Wastewater Management Plan |
| WPP | Wind Power Plant |
| WWF | World Wide Fund for Nature |
| YEKA | Wind Energy Based Renewable Energy Resource Areas |

1 Introduction and Project Summary

1.1 Overview

Enerjisa Üretim Santralleri Anonim Şirketi has been entitled to invest in the Aydın Connection Region on 30 May 2019 within the scope of “Renewable Energy Resource Areas (YEKA) Regulation” and “Allocation of Wind Energy Based Renewable Energy Resource Areas (YEKA) and Total Connection Capacities”¹. Upon this award, a “YEKA Use Rights Agreement” was signed between Enerjisa Üretim Santralleri Anonim Şirketi and Ministry of Energy and Natural Resources (MoENR) on 09 March 2020. Subsequently, the “YEKA Use Rights Agreement” signed by Enerjisa Üretim Santralleri Anonim Şirketi for the Aydın Connection Region was transferred to Enerjisa Enerji Üretim Anonim Şirketi (“Enerjisa Üretim” or “the Project Company”) with the transfer agreements signed on 03 June 2021.

Akköy Wind Power Plant (WPP) Project (“the Project”) with 6 turbines and 25.2 MWm/25.2 MWe total installed power, is planned to be implemented by Enerjisa Üretim in Aydın province, Didim district. The Project components consists of six turbines, a switchyard, a total of 10,269 m Project roads which are planned to be constructed (i.e., access and site roads) and a 34.5 kV energy transmission line (ETL) of approximately 5.8 km for connection to Akbük Transformer Substation. The Project is part of a nine-project wind energy investment package initiated by Enerjisa Üretim which has a 750 MW total installed power from a total of 180 wind turbines located in the Aegean and Marmara Regions of western Türkiye; aiming to evaluate and utilize the wind energy potential of the region and contribute to the national strategy and regional economy.

The Project area is one of the areas declared² as a YEKA within the scope of the YEKA Regulation³. The Project Company has secured the preliminary license valid for 24 months for securing the required permits for the Project. The construction of the Project had been initiated in the first quarter of 2023 with the construction of Project roads and was completed by the fourth quarter of 2023. The construction period of the Project was approximately 10 months, and the operation period will be 49 years as stated in the National Environmental Impact Assessment (EIA) Report.

The Project is subject to conduction National EIA Study in regard with the Regulation on Environmental Impact Assessment⁴ of Türkiye. In this sense, a National EIA Report was prepared for the Project by an environmental consultancy company, namely Nartus (with a competency certificate valid until 29 January 2025 and numbered 267). Upon submission of the Final National EIA Report to the Ministry of Environment, Urbanization and Climate Change (MoEUCC) General Directorate of Environmental Impact Assessment, Permit, and Inspection in September 2022 by Nartus, the “EIA Positive” decision for the Project was published on 12 September 2022 by the MoEUCC.

During the 24-month pre-licence period, which is currently ongoing, the nominal power of proposed wind turbines has changed in accordance with the official opinions of relevant authorities, leading to a change of the Project installed power capacity. Upon this change, a request was submitted to the MoENR for the amendment of pre-licence in regard with the change in the Project design, and the revised pre-licence was secured. According to this

¹ Published in the Official Gazette Date/No: 07.11.2018/30588.

² The declaration was published in the Official Gazette Date/No.: 21.03.2021/31430.

³ Published in the Official Gazette Date/No.: 09.10.2016/29852.

⁴ Published in the Official Gazette Date/No: 29.07.2022/31907.

change, the Project will consist of 6 wind turbines, each with a unit power of 4.2 MW_m; and it is projected that the WPP will have a 77,492.500 kWh /year of annual electricity generation capacity with a total installed power of 25.2 MW_m. Detailed information on design changes is provided in the Environmental and Social Impact Assessment (ESIA) Report, which is prepared to identify the impacts that are likely to occur due to implementation of construction and operation activities under the Project, and to comply with the requirements set by the IFIs. The ESIA for the Project aims to ensure that the Project is developed and operated in an environmentally and socially responsible manner, minimising or eliminating adverse impacts and maximizing positive contributions to the surrounding communities and the ecosystem.

The Project Company is seeking an international finance loan from the International Financial Institutions (IFIs) regarding implementation of the Project under the nine-project package and proposed the Project to the potential IFIs for financing. Accordingly, the nine-project package loan is seeking to be funded by a group of development finance institutions and commercial lenders and with partial coverage by the German ECA Euler Hermes Aktiengesellschaft ("EH"). The lenders altogether are defined as "Project Lenders". The Project Lenders set requirements to identify, assess, avoid/minimise (where possible), and manage potential environmental and social risks, and impacts associated with the projects for achieving sustainable outcomes in the financed projects as per their commitments for financing a project.

As part of the financing process and achieving the sustainable outcomes within the Project, Mott MacDonald Türkiye ("the Consultant") has been appointed by Enerjisa Üretim to undertake an ESIA Study to identify the impacts that are likely to occur due to implementation of construction and operation activities under the Project and to comply with the requirements set by the IFIs.

The Project includes several parties involved within various Project-related activities. In this sense, as well as its own Project team, the Project Company has appointed several consultancy companies to support during the National EIA process. The consultancy activities include social studies undertaken by Adam & Smith, and environmental monitoring studies for the National EIA undertaken by Nartus. The social consultants have regularly visited the mukhtars and residents of the neighbourhoods for approximately two years that are in close proximity to the Project area.

The main role of the abovementioned consultants was to engage with the local communities on behalf of the Project Company and collect information about the settlement history, residential conditions, natural structures, population, migration, health, education, and cultural patterns of the neighbourhoods. During the visits, they also provided information about the Project and its potential impacts on the neighbourhoods, especially of the land acquisition and expropriation.

Furthermore, the Project Lenders have appointed an Independent Environmental and Social Consultant (IESC), namely Ramboll and ACE, for monitoring of the Project in line with the Lenders' standards and requirements. Figure 1.1 indicates the organisational chart of the Project.

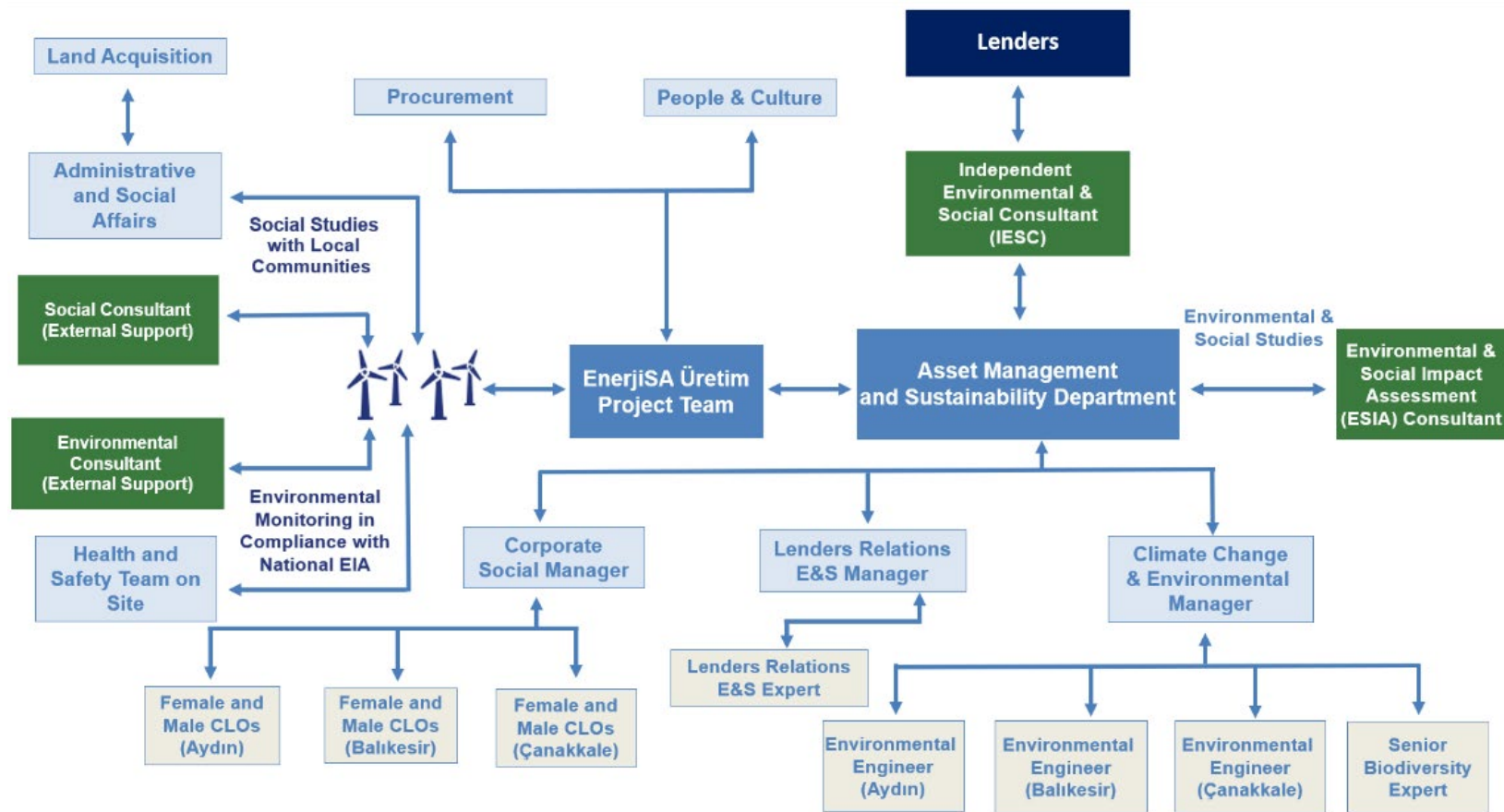


Figure 1.1: Project Organisational Chart

Source: Enerjisa Üretim

The IFIs seek compliance with internationally accepted environmental and social standards. Therefore, they require the Project Company to conduct an environmental and social assessment study and prepare the ESIA Report together with the relevant sub-plans.

This document represents the Stakeholder Engagement Plan (SEP) which has been prepared within the scope of the ESIA studies of the Project and in line with the requirements of the Performance Standard (PS) 1 of International Finance Corporation (IFC), Performance Requirements (PR) 1 and 10 of the European Bank for Reconstruction and Development (EBRD)⁵, the Principles 5 and 6 of the Equator Principles IV (EP IV), and Environmental and Social Policy and Procedures (ESPP) 3 and 5 of the International Development Finance Corporation (DFC) as well as the Turkish national legislation including the Turkish EIA Regulation (OG Date/Number: 29.07.2022/31907), Law on Right to Information (No. 4982), Law on Preservation of Personal Data (No. 6698), Law on Use of the Right to Petition (No. 3071), and Regulation on the Principles and Procedures for the Enforcement of the Law on the Right to Information.

1.2 Objectives and Scope of the Stakeholder Engagement Plan

Within the scope of the ESIA process, this Project-specific SEP covering the construction and operation phases is prepared by Mott MacDonald. The objective of this SEP is to provide a brief summary of the stakeholder engagement activities undertaken to date and present a strategic guideline for future stakeholder engagement and consultation activities that will be implemented throughout the Project lifecycle in a comprehensive and culturally appropriate way. The SEP will follow a gender-sensitive approach during all implementation phases. SEP ensures that communication tools and information sharing mechanism are accessible to the vulnerable groups identified within the scope of the Project.

The SEP defines the stakeholder engagement activities to be organized, grievance mechanism to be applied, and the Project personnel responsible for the overall SEP implementation. During the definition of these Project-specific components, the temporary SEP, which has been prepared prior to the ESIA process and in place since October 2023, was utilized.

The temporary SEP includes information about the previous stakeholder engagement activities and describes the future engagement requirements as well as the grievance mechanism, all of which are covered in the subsequent parts of this SEP. As per the temporary SEP and other related documents of the Enerjisa Üretim, the stakeholder engagement activities conducted so far have followed a local community member-centred and structured framework in line with the international requirements. The same approach will continue to be applied on site throughout the Project lifecycle. The Project Company is committed to actualize effective stakeholder engagement as defined in this SEP and in line with the IFC PS1, EBRD PR10, EP IV Principles and 5 and 6, and DFC ESPPs 3 and 5 requirements. The Project Company is also committed to follow the Turkish EIA Regulation (OG Date/Number: 29.07.2022/31907), Law on Right to Information (No. 4982), Law on Preservation of Personal Data (No. 6698), Law on Use of the Right to Petition (No. 3071), and Regulation on the Principles and Procedures for the Enforcement of the Law on

This SEP will be revised with the outcomes of the public participation meeting that will be conducted after the Final ESIA Report is prepared, and disclosure package of the Project is shared with the public.

⁵ The Project Company requires compliance with EBRD requirements.

1.3 Project Location and Social Area of Influence

The social area of influence (Aol) of the Project covers a total of two neighbourhoods in Didim district of Aydın province. These are the nearest settlements to the Project area including Akköy and Akyeniköy neighbourhoods in Didim district.

An analysis has been made to assess the social receptors of the Project during the construction and operation phases separately. Accordingly, the direct social receptors of the Project during the construction phase are as follows:

- Local community members whose livelihoods have the potential to be significantly and adversely affected due to land acquisition and/or expropriation of their agricultural or pasture lands (physical displacement has been avoided),
- Nearby neighbourhoods and business enterprises located in the immediate vicinity of the Project area (approximately 2 km to 4 km distant from the nearest turbines to their neighborhoods) that are likely to be exposed to increased traffic volume, road safety risks, dust, noise, and visual impacts,
- Local community members who are on the access roads to the Project area and/or use these roads, and are likely to be exposed to increased traffic volume and road safety risks,
- Local community members using the Project License Area for agriculture and animal husbandry and that may experience livelihood loss, increased traffic volume, and road safety risks,
- Local community members who may benefit from the Project's local employment opportunities,
- Business enterprises that may benefit from the Project's local procurement activities,
- Vulnerable groups who may be in need for essential consultation in the Project, and
- All construction phase workers employed within the scope of the Project (including subcontractors).

The social receptors that are estimated to be affected by the Project during the operation phase are listed below:

- Neighboring communities located in the close proximity of the Project area that are likely to be exposed to noise and visual impacts,
- Local community members who may benefit from the Project's local employment opportunities,
- Business enterprises that may benefit from the Project's local economic activities,
- Vulnerable groups who may be in need for essential consultation in the Project, and
- All operation phase workers employed within the scope of the Project (including subcontractors).

1.4 Expected Project Impacts and Summary of Mitigations

Project's social impacts and mitigation measures are summarized in the table below.

Table 1.1: Summary of the Project’s Social Impacts

| Impact Topic | Impact Description | Receptor | Phase of the Project | Mitigation Measures |
|--------------|---|---|----------------------|--|
| Population | It is critical that the Project workers coming to the region from outside are oriented in accordance with the social codes of the neighbourhood and integrated into daily life. | | Construction | <ul style="list-style-type: none"> • Trainings and Code of Conduct for workers • SEP, continuous consultation, and engagement through the Community Liaison Officers (CLOs) • Community grievance mechanism • Community Health, Safety and Security Procedure • Company GBVH Policy • Transport Control and Site Access Procedure/Traffic Management Plan • Road safety, traffic regulations and speed limit trainings for workers within and near the Project area |
| | Increased traffic volume during the construction phase throughout the access roads to the Project area may result in road traffic safety risks. | Local community members / Local communities / Project affected neighbourhoods | | <ul style="list-style-type: none"> • Trainings and Code of Conduct for workers • SEP, continuous consultation, and engagement through the CLOs • Community grievance mechanism • Community Health, Safety and Security Procedure • Transport Control and Site Access Procedure/Traffic Management Plan • Road safety, traffic regulations and speed limit trainings for workers within and near the Project area |
| | During the operation phase, the turbines will produce noise from their mechanical and electrical components, as well as from the aerodynamic effects of the blades. Residents whose houses are close to the turbines may be affected from the noise during the operation phase. | | | Operation |
| Education | Increased traffic volume during the construction phase throughout the access roads to the Project area may result in road traffic safety risks. | Students / Local community members / Project affected neighbourhoods | Construction | <ul style="list-style-type: none"> • Transport Control and Site Access Procedure/Traffic Management Plan • Awareness activities for children about road traffic safety |

| Impact Topic | Impact Description | Receptor | Phase of the Project | Mitigation Measures |
|--|---|--|----------------------|---|
| | Educational institutions take a significant place for the Project Company in terms of corporate social responsibility activities and collaboration (i.e., student visits to the Project, renovation of the schools). The Project may lead students to receive further opportunities in access to education. | | | <ul style="list-style-type: none"> Road safety, traffic regulations and speed limit trainings for workers within and near the Project area SEP, continuous consultation, and engagement through the CLOs Community grievance mechanism |
| Land Use, Physical and Economic Displacement | The land acquisition works of the Project is in progress. The lands planned to be acquired for expansion are used for generally agricultural purposes. Therefore, local community members who lose their agricultural or pasture lands may be impacted economically since their livelihood activities become limited or totally lost. Physical displacement has been avoided and is not expected within the scope of the Project. | Local community members whose lands are acquired-expropriated | Construction | <ul style="list-style-type: none"> SEP, continuous consultation, and engagement through the CLOs Community grievance mechanism Retrospective Resettlement Assessment Land Acquisition Procedure |
| | It is important to consider the harvest and cultivation dates of the agricultural products to reduce the risk of dust and loss of livelihood during the construction activities. | Local community members whose livelihoods are based on agriculture | | <ul style="list-style-type: none"> SEP, continuous consultation, and engagement through the CLOs Community grievance mechanism Air Quality Management Plan Retrospective Resettlement Assessment |
| Local Economy, Livelihood Sources and Employment | <p>The contractors and subcontractors of the Project will employ the local unskilled and semi-skilled workforce. This can contribute to a certain reduction in unemployment and increase in the welfare of the employed workers' families.</p> <p>During the construction phase of the Project, there will be numerous procurement opportunities which may be beneficial for the local businesses, enterprises, and suppliers in terms of income generation and increase.</p> | <p>Local community members / Local communities / Project affected neighbourhoods</p> <p>Local community members / Local businesses, enterprises, and suppliers</p> | Construction | <ul style="list-style-type: none"> Local employment and procurement strategy SEP, continuous consultation, and engagement through the CLOs Retrospective Resettlement Assessment Community grievance mechanism Local Content Procedure (LCP) |

| Impact Topic | Impact Description | Receptor | Phase of the Project | Mitigation Measures |
|--------------------------|--|--|----------------------|--|
| Infrastructural Services | <p>The operation of infrastructure facilities (i.e., residents' access to local community infrastructures such as schools and mosques, access to irrigation systems, water resources and agricultural infrastructure) is of great importance for the people living in that region to continue their daily lives. However, local community members and mukhtars of the neighbourhoods did not report any concern related to these potential impacts. Consideration will be given to ensuring that the infrastructure system is operational throughout the construction period.</p> | Local community members / Project affected neighbourhoods | Construction | <ul style="list-style-type: none"> • SEP, continuous consultation, and engagement through the CLOs • Community grievance mechanism • Correspondence with governmental institutions when necessary (i.e., for water, road, transportation issues) • Community Health, Safety and Security Procedure |
| Gender | <p>The Project may improve the gender equality through local employment of both women and men residing in the Project affected neighbourhoods.</p> <p>Land acquisition activities may not be conducted with the equity and equality perspective, which may lead to the fact that local community members are discriminated due to their gender and other characteristics.</p> <p>The potential influx of male workers into neighbourhoods due to the Project construction activities has various impacts on women's daily lives and livelihood activities, which should be considered when discussing gender and vulnerable groups. Increased congestion and noise are not expected to disrupt women's daily routines, including household chores, childcare responsibilities, and access to community resources.</p> <p>Throughout the construction activities, gender-based violence and harassment (GBVH) cases may occur unless preventive measures are taken.</p> | Local community members | Construction | <ul style="list-style-type: none"> • Trainings and Code of Conduct for workers • Awareness raising activities for the Project affected neighbourhoods • Specific meetings with women in the Project affected neighbourhoods • SEP, continuous consultation, and engagement through the CLOs • Community grievance mechanism • Community Health, Safety and Security Procedure • Company GBVH Policy |
| Vulnerable Groups | <p>All construction activities will be carried out considering the vulnerabilities of existing groups (i.e., the elderly local community members, local community members with chronic health problems</p> | Local community members who are in a more disadvantaged position | Construction | <ul style="list-style-type: none"> • Trainings and Code of Conduct for workers • SEP, continuous consultation, and engagement through the CLOs |

| Impact Topic | Impact Description | Receptor | Phase of the Project | Mitigation Measures |
|--------------|---|----------|----------------------|---|
| | like asthma) to prevent their daily life practices and/or access to certain services (i.e., health facilities in the district) to be affected disproportionately and negatively due to Project impacts. | | | <ul style="list-style-type: none">• Community grievance mechanism• Community Health, Safety and Security Procedure |

Source: Final ESIA Report of the Project

The positive social impacts of the Project will be on local employment creation and local economic contributions through procurement of goods and services specifically during the construction phase. In addition to these, the Project will also improve local infrastructural capacity such as improving the access roads of the neighbourhoods while increasing the domestic production capacity of clean energy on a country basis during the operation phase.

The major adverse impacts of the Project during the construction phase are assessed as land acquisition and expropriation, dust, noise, and traffic generation. No local community members are expected to face any kind of displacement as a result of urgent expropriation during construction of the turbines. However, the access road design and construction may trigger economic displacement cases. For the development and establishment of a systematic way to compensate, the Retrospective Resettlement Assessment (RRA) has been prepared.

Operation phase adverse impacts that are assessed within the ESIA study are related to noise and visual impacts (i.e., shadow flicker, ice and blade throw). During the operation of a wind power plant, one of the visual impacts that can affect nearby residents is shadow flicker. Shadow flicker occurs when the rotating blades of a wind turbine cast shadows that intermittently pass over nearby structures or residences as the sun changes position. The repetitive nature of this flickering effect, particularly during sunrise and sunset, has the potential to cause visual discomfort and annoyance for those living in the proximity of the wind turbines.

Within the scope of the Project, turbine distances to the households have been calculated as being very distant, and it is concluded that visual impact is expected to be only slightly changing the view of the residents. Thus, according to visual impact assessment methodology defined for the Project, visual impacts are found to have negligible/minor impact on the residents/households. To summarize, no residences have been identified in the area of shadow flicker impact.

During the operation phase of a wind power plant, one of the notable risks to community health and safety is associated with blade throw incidents. The rotating blades of wind turbines, often spanning considerable lengths, pose a potential hazard if a malfunction or extreme weather conditions lead to the detachment of a blade. Moreover, in colder climates, the operation of wind turbines introduces an additional risk in the form of ice throw. As the turbine blades rotate, they may accumulate ice during freezing conditions.

Assessments for blade throw risks show that even during more extreme weather conditions resulting in higher wind speed, the maximum throw distance can be expected to be less, and the probability of a blade throw risk is significantly small. In this regard, five structures were identified within the setback distances for blade throw risks; additionally, blade loss risks were evaluated for average and maximum wind speed, and it was discovered that there are 14 structures within the average and 16 structures within the maximum wind speed throw zones. To conclude, the receptor sensitivity of blade throw can be assumed to be medium as the existence of the structures within the risk zones. Considering the low probability and expected small throw distance, the impact regarding blade throw is considered to be negligible for average distance and maximum distance which makes overall impact magnitude minor for both distances. Hence no physical displacement is in question as no significant blade throw risk is in place.

ESIA ice throw assessment studies of the Project show that there are five structures within the ice-throw distance being the closest house is in 244 m distance to the nearest turbine which makes the impact magnitude major and receptor sensitivity medium. Hence, the overall impact significance can be considered as major.

Mitigating the risks associated with blade and ice throw incidents involves the implementation of advanced technologies and operational controls. Utilizing sensors and monitoring systems enables real-time tracking of ice accumulation on turbine blades, allowing for timely intervention

to prevent ice throw. Adjusting operational parameters during icy conditions and employing technologies like de-icing systems contribute to minimizing the risks associated with blade and ice throw incidents. Furthermore, the Community Health and Safety Plan and Emergency Preparedness and Response Plan, which include the necessary protocol for responding to any occurrences, will be followed as part of the mitigating measures.

In addition, to mitigate blade throw risk, periodic inspections and maintenance of wind turbine blades will be carried out to detect potential issues such as cracks, material deterioration, or fatigue. By addressing these concerns proactively, the risk of blade failures can be significantly reduced. The blades will be stopped working if the wind speed is 28 m/s to avoid any blade and ice throw risk.

Local people will be warned during cold weather and extreme windy days to inform about possible risks. Furthermore, warning signs will be placed nearby the turbines to state the risk of ice and blade throw.

2 Stakeholder Engagement Requirements

2.1 Overview

Continuous, open, and transparent stakeholder engagement is an essential aspect in projects to ensure the project's sustainability, improved quality, and better implementation. The objective of the stakeholder engagement is successfully managing the risks and impacts on communities, people, groups, businesses, and any other interested parties affected by projects. Robust stakeholder identification and stakeholder mapping are the very first and significant steps of an effective stakeholder engagement.

Stakeholder engagement provides a mutual communication line between the Project Company and the Project stakeholders, which will continue throughout the Project lifecycle including construction and operation phases. Different phases of the Project can necessitate varying engagement and consultation activities. The Project Company is responsible for establishing a platform that enables continuous communication and consultation with all Project stakeholders.

As the international standards and requirements (particularly IFC PS1, PS2, and PS5, EBRD PR10, EP IV Principles 5 and 6, and DFC ESPPs 3 and 5) necessitate, stakeholder consultation and engagement involve the following aspects:

- Identification and analysis of all potentially affected individuals, groups, communities, organizations, vulnerable/disadvantaged individuals, and groups that will be considered as stakeholders,
- Planning the steps for the way stakeholder engagement, information disclosure and meaningful consultation with stakeholders will be held,
- Identification of the issues that remain as a risk or adverse impact for the Project or the stakeholders,
- Formation of a good understanding of the Project for stakeholders,
- Addressing a grievance mechanism, which is free of manipulation, coercion, and intimidation for long-term communication between the Project and the stakeholders,
- Responding to grievances in a timely manner through the grievance mechanism, and
- Regularly informing the stakeholders about the Project.

To ensure that stakeholder engagement processes are successful and effective, stakeholder engagement should be initiated earlier in the projects. In line with the IFC PS1, PS2, and PS5, EBRD PR10, EP IV Principles 5 and 6, and DFC ESPPs 3 and 5, stakeholder engagement has started during the National EIA process of the Project through engagement with the key project stakeholders. Please see Section 4.2 for past stakeholder engagement activities. Stakeholder engagement will continue throughout the Project lifecycle.

2.2 Applicable Guidelines and Standards

This SEP has been prepared in compliance with the national legislation and international standards and requirements (particularly IFC PS1, PS2, and PS5, EBRD PR10, EP IV Principles 5 and 6, and DFC ESPPs 3 and 5), which are explained in detail in the following sections.

2.2.1 National Requirements

The Turkish EIA Regulation (OG Date/Number: 29.07.2022/31907) includes a number of requirements regarding information disclosure and stakeholder participation.

During the scoping phase of the projects, stakeholder engagement within the scope of the National EIA process starts with the establishment of a commission that involves representatives from related governmental bodies and that is responsible for review and assessment of the project.

Establishment of the commission is followed by the public participation meeting. Organizing a public participation meeting is legally obligatory as per the regulation. The aim of the public participation meeting is to ensure that the public and interested parties in the project (i.e., Local community members, governmental bodies, non-governmental organizations) are informed about the project and have an opportunity to raise their opinions, suggestions and/or concerns regarding the project. It is crucial that the Local community members who are assessed to be most affected by the project are enabled to participate in this meeting. Therefore, organizing the meeting that is accessible to the Local community members to the most possible extent is also underlined within the regulation.

The issues reported by the participants of the meeting are documented in the official meeting minutes to be considered and addressed in the EIA document. In addition, the institutions authorized by the Ministry of Environment, Urbanization and Climate Change (MoEUCC) prepare a SEP in order to inform the public about the project and its impacts, and to facilitate receiving the opinions and suggestions of the public regarding the project. However, this regulation is effective as of July 2022 and the public participation meeting of the Project subject to the EIA process was held in January 2022. Therefore, it is exempt from the requirement to prepare a SEP within the scope of the EIA process.

Once the EIA document is submitted to the MoEUCC for review, the MoEUCC and the related provincial directorates announce to the public that the review process of the established commission has started, and the draft EIA document is also open to public review and comments for 30 days. Appropriate communication channels (i.e., newspapers, noticeboards, and the Internet) are used for the announcement.

Following the review of the commission and the public, the final draft of the EIA document is disclosed by the MoEUCC and the related provincial directorates for 10 days through announcement boards and the Internet. By considering the evaluations of the committee and public views, the MoEUCC gives the "EIA Positive" or "EIA Negative" decision regarding the project. EIA reports that receive a "EIA negative" decision are obliged to be re-disclosed to public review and relevant stakeholders (same methods as explained above). No additional public participation meeting is required.

At the final stage, the decision of the MoEUCC is also disclosed to the Project stakeholders by using appropriate means of communication.

National legislation related to consultation, information disclosure, stakeholder engagement and grievance mechanism also includes Law on Right to Information (No. 4982), Law on Preservation of Personal Data (No. 6698), Law on Use of the Right to Petition (No. 3071), and Regulation on the Principles and Procedures for the Enforcement of the Law on the Right to Information, which are described below:

Law on the Right to Information (No. 4982)

Law on the Right to Information 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.

Law on Preservation of Personal Data (No. 6698)

The purpose of this Law is to protect the fundamental rights and freedoms of individuals, especially the privacy of private life, in the processing of personal data and to regulate the

obligations of real and legal persons processing personal data and the procedures and principles to be followed.

The Law on Use of the Right to Petition (No. 3071)

Citizens of the Turkish Republic are entitled to apply Turkish Grand National Assembly and the public authorities by written petition, in respect to their requests and complaints, in accordance with the Article 3 of the Law on Use of the Right to Petition (Official Gazette dated 01.11.1984 and numbered 3071). Foreigners residing in Türkiye are also entitled to enjoy this right on the condition of reciprocity and using Turkish language in their petitions.

2.2.2 International Requirements

The stakeholder engagement and consultation requirements of the Project are assessed and planned by considering the following international standards:

- IFC's Performance Standards on Environmental and Social Sustainability (2012)
 - Performance Standard 1 – Assessment and Management of Environmental and Social Risks and Impacts: PS 1 emphasizes on the importance of: (i) an integrated assessment to identify the environmental and social impacts, risks and opportunities of the Project; (ii) effective community and stakeholder engagement through disclosure of Project-related information and consultation with local communities on matters that directly affect them; and (iii) the Client's management of social and environmental performance throughout the life of the Project through management programs, monitoring, and review.
 - Performance Standard 2 – Labour and Working Conditions: In accordance with Performance Standard 2, efforts to promote economic growth by generating employment and income should safeguard the fundamental rights of employees. Employees are a valuable asset to their companies, and a robust relationship between employees and management is essential for the company's sustainability. The client will establish a grievance mechanism for employees (and workers' organisations) to raise workplace concerns. Information about the grievance mechanism will be provided to employees during recruitment, and the mechanism will be easily accessible to them.
 - Performance Standard 5 – Land Acquisition and Involuntary Resettlement: Decision-making processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. Disclosure of relevant information and participation of Affected Communities and persons will continue during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are consistent with the objectives of the Performance Standard.
- EBRD's Environmental and Social Policy & Performance Requirements (2019)
 - Performance Requirement 1 - Assessment and Management of Environmental and Social Risks and Impacts: PR 1 emphasizes the significance of integrated assessment of the environmental and social impacts and issues associated with the Project and identify the Project's stakeholders and design a plan for engaging with the stakeholders in a meaningful manner to take their views and concerns into consideration in planning, implementing, and operating the Project with reference to the PR10. Mitigation measures defined for the environmental and social impacts will be developed and implemented so that vulnerable people within the scope of the Project are not disproportionately impacted.
 - Performance Requirement 5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement: During all Project-related land acquisition processes, PR 5 requires engaging with the Local community members and communities through meaningful consultation, and disclose relevant information throughout the planning, implementation, monitoring and evaluation of land acquisition, and resettlement process including

livelihood improvement. The Client should ensure that all groups, including the vulnerable are informed and made aware of their entitlements, rights, opportunities, and benefits.

- Performance Requirement 10 - Information Disclosure and Stakeholder Engagement: PR 10 recognises the significance of a transparent engagement with relevant stakeholders (especially those defined as vulnerable groups within the scope of the Project) and disclose appropriate Project information throughout the lifetime of the Project. Providing an accessible grievance mechanism as a part of the stakeholder engagement is crucial for building strong, constructive, and responsive relationships which are essential for a successful environmental and social impacts management within the Project.
- Equator Principles IV (2020)
 - Principle 5 - Stakeholder Engagement: Principle 5 recognizes that for all Category A and Category B projects, the EPFI will require the client 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.
For projects with potentially significant adverse impacts on affected communities, the principle requires performing an informed consultation and participation process. The client is expected to tailor its consultation process to: (i) the risks and impacts of the project; (ii) the project's phase of development; the language preferences of the affected communities; their decision-making processes; and (iii) the needs of disadvantaged and vulnerable groups.
 - Principle 6 - Grievance Mechanism: Principle 6 recognizes that for all Category A and, as appropriate, Category B projects, the EPFI will require the client, as part of the ESMS, to establish effective grievance mechanisms which are designed for use by affected communities and workers, as appropriate, to receive and facilitate resolution of concerns and grievances about the project's environmental and social performance.
- DFC Environmental and Social Policy and Procedures (2020)
 - Environmental and Social Policy and Procedure 3 - Environmental and Social Review: It necessitates undertaking meaningful consultation with Project Affected People within the defined area of influence. For all projects, meeting the requirements related to stakeholder engagement, stakeholder analysis and engagement planning, access to information, consultation, reporting to stakeholders and the establishment of a grievance mechanism is obligatory. The form and scope of the consultation should be commensurate with the project risks and the nature and scope of the project.
 - Environmental and Social Policy and Procedure 5 – Public Consultation and Disclosure: The objectives are to ensure that Project Affected People are informed and consulted during project preparation and implementation and to enhance transparency and accountability related to DFC's environmental and social management. Projects are required to develop and implement a Stakeholder Engagement Plan tailored to project risks and impacts in accordance with the requirements of IFC PS1.

2.2.3 Applicable Policies and Management Systems of the Project Company

A Project-specific temporary SEP, which has been prepared prior to the ESIA process, is in place since October 2023. According to the content of the temporary SEP, the Project Company has a Corporate SEP that defines the stakeholders, disclosure approach, commitment to meaningful consultation and participation, ongoing reporting to external stakeholders, and grievance management of the Project Company.

The Project Company has also an integrated Quality, Health and Safety, Environment and Energy Management Systems and relevant certifications, which are listed below:

- ISO 9001: 2015 - Quality Management System

- ISO 14001: 2015 - Environmental Management System
- ISO 45001: 2018 - Occupational Health and Safety Management
- ISO 50001: 2018 - Energy Management System
- ISO/IEC 27001: 2013 - Information Security Management System
- ISO 55001 – Asset Management System

Of these management systems, ISO/IEC 27001: 2013 - Information Security Management System Certificate was received on 21 September 2022 and valid until 21 February 2025 whereas the remaining was received on 20 January 2021 and valid until 19 January 2024. In line with these management systems, the Project Company has an Integrated Management Systems Policy. In addition, the Project Company has the following policies and management plans, which are disclosed at the website⁶:

Corporate level:

- Social Responsibility Policy
- Open Door Policy
- Resettlement Framework
- Policy on People and Culture
- GBVH Policy (will be shared on the website when finalised)
- Information Security Management Policy
- Privacy Policy
- Code of Business Ethics
- Code of Compliance

Project Specific:

- Retrospective Resettlement Assessment
- Community Health, Safety Plan
- Emergency Response Plan
- Traffic Management Plan
- Security Management Procedure

Apart from the above-mentioned policies and management systems, the Project Company has Equality, Diversity, and Inclusion Regulation, Procedure Against Domestic Violence, Corporate Communication Procedure, and Crisis Management Procedure. In addition, the Social Management Procedure, which covers guidelines for land acquisition and compensation process, social impact management, social support for community benefit, facility-based plans and implementation and social management system, is applied at all facilities of the Project Company.

The Project Company is also a Business Council for Sustainable Development Türkiye member since 11 January 2022. Furthermore, the Project Company is a signatory of the United Nations Global Compact (UNGC) since 02 August 2022 and Women's Empowerment Principles (WEPs) since 20 April 2022 as well as member of Carbon Disclosure Project (CDP) since 2021.

⁶ <https://www.enerjisauretim.com.tr/>

3 Stakeholder Identification and Analysis

3.1 Overview

In line with the definitions of international standards, stakeholders are defined as the individuals or groups who are impacted by a project or possess an interest in its outcome. Project’s impact may be positive or negative and can be direct or indirect.

The first step of the stakeholder engagement is to identify the Project stakeholders. The aim of this identification is to determine each stakeholder group and define their relation to the Project. It is important to consider their opinions, perspectives, concerns and needs when undertaking a project to ensure successful outcomes.

3.2 Project Stakeholders

Identified stakeholders of the Project are categorized as external stakeholders (including governmental and non-governmental bodies, mukhtars/residents/local communities, vulnerable/disadvantaged groups, media and universities) and internal stakeholders (all Project staff, including contractors and subcontractors and their employees) which are given in Table 3.1 through Table 3.4 below. All stakeholders are categorized and colour-coded as high (red), medium (yellow) or low (green) depending on their level of interest in the Project as measured by an assessment of the magnitude of stakeholder influence and impact on the Project. In line with each stakeholder’s level of interest, disclosure and consultation activities are determined based on certain frequencies for construction and operation phases of the Project. Disclosure and consultation activities to be implemented throughout the lifetime of the Project is outlined in Table 5.1 together with the proposed implementation timetable.

Table 3.1: External Stakeholder List for Governmental Authorities

GOVERNMENTAL BODIES

| Level | Organization | Relation to the Project | Level of Interest |
|--|---|---|-------------------|
| | Ministry of Energy and Natural Resources | Ministry of Energy and Natural Resources and its relevant departments have regulatory functions relation to the Project and its components. | High |
| | Energy Market Regulatory Authority (EPDK) | EPDK is one of the key stakeholders of the Project in relation to the Project scope and components in general. | High |
| | Turkish Electricity Transmission Company (TEIAS) | TEIAS is a key stakeholder when the ETL of the Project is considered. | High |
| National | Ministry of National Defence | Ministry of National Defence is a significant stakeholder since securing the Project area is crucial. | Low |
| | Ministry of Agriculture and Forestry (MoAF) | MoAF may have specific views about the design, construction, and operation activities of the Project. | Medium |
| | MoAF, General Directorate of Food and Control | | |
| | MoAF, General Directorate of Livestock | | |
| | MoAF, General Directorate of Fisheries and Aquaculture | | |
| | MoAF, General Directorate of Nature Conservation and National Parks | | |
| MoAF, General Directorate of State Hydraulic Works | | | |

GOVERNMENTAL BODIES

| Level | Organization | Relation to the Project | Level of Interest |
|--|---|---|-------------------|
| National | MoAF, General Directorate of Water Management | MoEUCC has regulatory functions in relation to the Project such as environmental impact assessment permits and environmental permitting. | Medium |
| | Ministry of Environment, Urbanization and Climate Change (MoEUCC) | | |
| | MoEUCC, General Directorate of EIA, Permit and Audit | | |
| | MoEUCC, General Directorate of Environmental Management | | |
| | MoEUCC, General Directorate of Infrastructure and Urban Transformation | | |
| | MoEUCC, General Directorate of Spatial Planning | | |
| | MoEUCC, General Directorate of Protection of Natural Assets | | |
| | Ministry of Transport and Infrastructure (MoTI) | MoTI may have specific views regarding evaluation of the Project. | Medium |
| | MoTI General Directorate of Infrastructure Investments | | |
| | MoTI General Directorate of Highways | MoLSS may have specific views on labour and working conditions, and health and safety of the Project personnel. | Low |
| Ministry of Labour and Social Security (MoLSS) | | | |
| MoLSS, General Directorate of Labor | | | |
| MoLSS, General Directorate of Occupational Health and Safety | MoCT may have views in terms of legislation. | Low | |
| Ministry of Culture and Tourism (MoCT) | | | |
| MoCT General Directorate of Cultural Heritage and Museums | This organization may have specific views about water courses running close to the Project area. | Low | |
| 21 st Regional Directorate of DSI (State Hydraulic Works) | | | |
| 4 th Regional Directorate of Ministry of Agriculture and Forestry | | | |
| 2 nd Regional Directorate of General Directorate of Highways | | | |
| Regional | Aydın Regional Board Directorate of Cultural Assets Protection | This organization are important stakeholders to identify and clarify the archaeological potential of the Project area. | High |
| | The Governorship of Aydın | The governorship representing the national government is the highest authority in the province. | High |
| | Aydın Provincial Directorate of Planning and Coordination | This organization coordinates all kinds of investment and construction works to be carried out by ministries and other central government organizations in the provinces. | High |
| Provincial | Aydın Metropolitan Municipality | The municipality and its relevant departments will have responsibilities in relation to the Project. | High |
| | Aydın Metropolitan Municipality, Directorate of Environmental Protection and Control | | |
| | Aydın Metropolitan Municipality, Directorate of Zoning and City Planning | | |
| | Aydın Metropolitan Municipality, Directorate of Transportation | | |
| Aydın Governorship Provincial Directorate of Social Security Institution | This organization may provide specific views on labour and working conditions, and health and safety of facility personnel. | Low | |

GOVERNMENTAL BODIES

| Level | Organization | Relation to the Project | Level of Interest | |
|-------|---|--|-------------------|--------|
| | Aydın Governorship Provincial Directorate of Environment, Urbanization and Climate Change (PDoEUCC) | PDoEUCC of the provinces have regulatory functions related to the Project such as environmental impact assessment permits and environmental permitting. | High | |
| | Aydın Provincial Directorate of Environment and Urbanization | This organization has regulatory functions in relation to the Project such as environmental impact assessment permits and environmental permitting. | High | |
| | Aydın Cultural Heritage Preservation Regional Board Directorate | This organization is an important stakeholder to identify and clarify the archaeological potential of the Project area. | High | |
| | Aydın Provincial Directorate of Agriculture and Forestry | This organization may provide provincial-specific and/or site-specific views on the Project. | High | |
| | Aydın Provincial Command of Gendarmerie | This organization may provide provincial-specific and/or site-specific views on the Project. | Medium | |
| | Aydın Water and Sewer Administration | This organization may provide an opinion related to water/wastewater infrastructure of the Project area. | Medium | |
| | The District Governorship of Didim | The Project area is located in Didim district and the local governorship, the central municipality and their related departments are stakeholders regarding obtaining relevant permits, approvals during planning, and construction and operation phases of the Project. | High | |
| | The Municipality of Didim | | | |
| | Directorate of Zoning and Urbanisation | | | |
| | Directorate of Civil Works | | | |
| | Directorate of Plan and Project | | | |
| | Directorate of Cleaning Works | | | |
| | Directorate of Municipal Police | | | |
| | Didim District Directorate of Health | | | Medium |
| | Didim District Gendarmerie Command | | | Medium |
| | Didim District Directorate of Agriculture and Forestry | | | High |

Table 3.2: External Stakeholder List for Non-Governmental Bodies

NON-GOVERNMENTAL BODIES

| Level | Organization | Relation to the Project | Level of Interest |
|--|---|--|-------------------|
| National, Provincial and District | Turkish Wind Energy Association | These foundations, associations, and chambers may provide their specific views related to the Project. | High |
| | Türkiye Foundation for Combating Erosion, Afforestation and Protection of Natural Assets (TEMA) | | |
| | Environmental Protection and Research Foundation (ÇEV-KOR) | | |
| | Turkish Environmental Protection Foundation (TUÇEV) | | |
| | Turkish Nature Conservation Association | | |
| | Foundation for the Protection and Promotion of Environmental and Cultural Values (ÇEKÜL) | | |
| | World Wide Fund for Nature (WWF) Türkiye | | |
| | Bird Life International Türkiye Partner- Doğa Association | | |
| | The Nature Conservation Centre | | |
| | Resource, Environment and Climate Association (REC) | | |
| | Ecological Research Society (EKAD) | | |
| | Greenpeace Akdeniz Türkiye | | |
| Association for Sustainable Economics and Finance Research (SEFIA) | | | |

NON-GOVERNMENTAL BODIES

| Level | Organization | Relation to the Project | Level of Interest |
|-------|--|-------------------------|-------------------|
| | Aydın Chamber of Commerce | | |
| | Aydın Chamber of Tradesmen and Craftsmen | | |
| | Aydın Chamber of Agriculture | | |
| | Didim Chamber of Commerce | | |
| | Didim Chamber of Tradesmen and Craftsmen | | |
| | Didim Chamber of Agriculture | | |
| | Didim Animal & Nature Protection Association | | |
| | Didim Hunting Association | | |
| | Didim Tourism Association | | |
| | Didim Fishermen Association | | |
| | Didim Ehlbeyt Science and Culture Association | | |
| | Didim Disabled People Association | | |
| | Didim Pigeon Lovers and Breeders Protection and Sustenance Association | | |
| | Akyeniköy Agricultural Development Cooperative | | |

Table 3.3: Other External Stakeholder Groups

STAKEHOLDER GROUPS

| Level | Group | Relation to the Project | Level of Interest | |
|---|--|---|-------------------|--|
| Mukhtars/Residents/Local Communities | The mukhtars and residents at Akköy and Akyeniköy neighbourhoods | Neighbourhoods are key stakeholders considering potential impacts of the Project. | High | |
| | Local Businesses and Enterprises (Local shops, beekeepers, income-generating agricultural lands) | | | |
| | Three informal users on three of the Project affected public lands identified within the scope of the RRA studies | | | |
| | Structure owners whose structures are within the turbine setback area of the Project | | | |
| | Local communities including PAPs subject to direct land acquisition | | | |
| Vulnerable/ Disadvantaged Groups | Women | Vulnerable groups are key stakeholders considering potential impacts of the Project. | High | |
| | The landless/homeless people | | | |
| | The elderly | | | |
| | Students | | | |
| | People with disabilities | | | |
| Media | Unemployed people | It is important to engage with local and regional media organizations for effective public disclosure and consultation. | Medium | |
| | Local, regional, and social media (including but not limited to the following newspapers, TV stations, social media channels): | | | |
| | • Aydın Ses Newspaper | | | |
| | • Aydın Denge Newspaper | | | |
| | • Aydınpost News | | | |
| | • Didim Haber | | | |
| • Didim Postası | | | | |
| • Mavi Didim Newspaper | | | | |
| Universities | Aydın Adnan Menderes University | Universities are one of the key stakeholders when research needs to be conducted within the scope of the Project. | Medium | |

STAKEHOLDER GROUPS

| Level | Group | Relation to the Project | Level of Interest |
|---|-------------------------------------|--|-------------------|
| Other potentially affected local social institutes | Didim State Hospital | It is essential to ensure that the social environments that pose a significant place for community health, safety and security issues (i.e., hospitals, fire stations) and/or where key stakeholders utilize/ spend their time are operating properly at every stage of the Project. | Medium |
| | Egemed Meidcal Centre | | |
| | Didim Firestation | | |
| | Didim District Security Directorate | | |
| | Didim Akkoy Middle School | | |
| | Şht. Soner Turan Primary School | | |
| | Balat Primary School | | |
| | Akköy Primary School | | |
| | Mosques | | |
| | Local Coffeeshops | | |
| Fire Watchtowers near the Project affected neighbourhoods | | | |

Table 3.4: Internal Stakeholder List

INTERNAL STAKEHOLDERS

| Level | Organization | Relation to the Project | Level of Interest |
|------------------------------|--|---|-------------------|
| Internal Stakeholders | Project staff | These groups are one of the key stakeholders in terms of continuation of the Project activities in compliance with the international standards. | High |
| | Contractors and subcontractors and their employees | | |
| | Suppliers and their workers | | |

4 ESIA Consultation Activities and Outcomes

4.1 Overview

International standards emphasize that stakeholder engagement and consultation is one of the key components of the ESIA process to reach and inform as many stakeholders as possible, especially those in the Project area of influence through the stakeholder engagement activities.

In this regard, the objectives of the Project's stakeholder engagement and consultation process include ensuring that identified stakeholders are appropriately informed and consulted on issues that could potentially affect them and maintaining a constructive relationship with stakeholders on an ongoing basis throughout the lifecycle of the Project.

4.2 Previously Carried out E&S (Environmental and Social) Activities

Correspondence / Opinion Letters

During the National EIA process and prior to the ESIA studies, the Project Company conducted consultation activities with the governmental bodies to receive opinions on the Project through correspondence. These consulted governmental bodies are listed below:

- Ministry of Environment, Urbanization and Climate Change
 - General Directorate of Meteorology, Presidency of Observation Systems Department
 - General Directorate of the Protection of Natural Assets
- Ministry of Energy and Natural Resources
 - General Directorate of Energy Affairs
- Ministry of Agriculture and Forestry
 - General Directorate of Forestry
- Ministry of Transport and Infrastructure
 - General Directorate of Highways, 2nd Regional Directorate
- General Directorate of State Airports Administration, Department of Electronics
- Aydın Governorship
 - Provincial Directorate Health
 - Provincial Directorate on Disaster and Emergency
- Aydın Metropolitan Municipality
- Didim Municipality
 - Directorate of Cleaning Works

According to the received opinion letters, a number of important concerns are noted as described below.

- Ministry of Energy and Natural Resources, General Directorate of Mining and Petroleum Affairs, Special Areas and Map Department has emphasized that, the examination of the Project area registered in the Authority's system as "Akköy WPP Special Permit Area" under number ER:3420307, as identified within the provided coordinates. In addition, it conflicts with geothermal spring and mineral water exploration license areas number ER:3388923, Project Company should obtain opinion of relevant Governorship. Therefore, it is noted that there is no objection from the Authority to the finalization of the Project with the revised coordinates of the Turbines.

- Ministry of Energy and Natural Resources, General Directorate of Mining and Petroleum Affairs, Special Areas and Map Department has emphasized that, after the examination of National EIA report there is any objection of finalization of the Project.
- General Directorate of Highways 2nd Regional directorate approval has been granted provided that Project area does not intersect with the routes within the responsibility of the Authority. In addition, within the scope of the Project activities, it was specified in the Authority's internal directive that "the minimum distances that wind energy power plants should have to the highway boundary line are as follows: on highways ... $B: 1.5 * (H+L)$; on State and Provincial Roads ... $B: 1.25 * (H+L)$, B: distance (m), H: tower height (m), L: blade length (m)." It was emphasized that these minimum distances should be adhered to, transportation within the Project should be carried out in accordance with the 2918 Road Traffic Law, and the permits specified in the legislation should be obtained in advance for such transportation. It was also required that no new connections to the roads should be established, except for the existing connections within the Project area. Furthermore, if a connection is to be made from the Project area to a public road, it is necessary to apply to the Authority with detailed projects, taking into account the provisions of the 2918 Road Traffic Law and the regulations issued in connection with it.
- Aydın Governorship, Provincial Directorate of Agricultural and Forestry emphasized that, before starting construction phase such as excavation/filling for the Project, which is planned to be constructed within the border of Akköy neighbourhood of Didim district of Aydın province, the necessary permits must be obtained, these are the Agricultural Reform Law No. 3083 on Land Regulation in Irrigation Areas, the law no. 3573 on the Improvement of Olive Cultivation, and the Soil Protection and Land Use law no. 5403. The National EIA process must continue, provided that the necessary permits are committed.
- Aydın Governorship, Provincial Directorate of Agricultural and Forestry emphasized that, before starting construction phase such as excavation/filling for the Project, which is planned to construct within the border of Akköy neighbourhood of Didim (Yenihisar) district of Aydın province, the necessary permits must be obtained, these are the Agricultural Reform Law No. 3083 on Land Regulation in Irrigation Areas, the law no. 3573 on the Improvement of Olive Cultivation, and the Soil Protection and Land Use law no. 5403. The National EIA process must continue, provided that the necessary permits are committed.

In conclusion, various authorities have raised concerns about different aspects of the proposed Project. These concerns include safety, environmental impact, and compliance with legislation. The authorities have outlined specific requirements and recommendations for the Project's development. The official correspondences conducted within the scope of environmental and social studies were provided in the final National EIA Report.

Within the scope of the National EIA studies, social impact assessment studies were conducted as well. The Project Company appointed a social consultancy company, whose consultants have been on the field and consulting the residents in the nearby neighbourhoods for approximately two years. Accordingly, stakeholder engagement activities started in June 2021 with the involvement of the social consultants to grasp the socioeconomic background of the Project affected neighbourhoods. Consultations were conducted with mukhtars, local community members, and non-governmental organisations to identify the issues and concerns of the stakeholders in relation to the Project.

Project affected neighbourhoods were visited by the social consultancy company appointed by the Project Company in September 2021, before the EIA public disclosure meeting. The participatory field study was designed to exchange information on the phases and timeline of the Project, and to gain an understanding of the socioeconomic conditions and the main sources of income within the neighbourhoods around the Project area, potential impacts and

whether there were any concerns or grievances about the Project by the local community members.

The public participation meeting was carried out in Aydın province, Didim district, Akköy neighbourhood within the scope of the National EIA studies. Public participation meeting was conducted on 07 January 2022. The meeting aimed to engage with the public, especially the local community members, provide information about the Project, and gather their feedback and concerns regarding the Project. Potential local community members are composed of the ones who live in the residential areas that are close to the Project area and the end users who will be involved in benefitting from the activities undertaken in the scope of the Project.

The meeting was hosted in Park Local Coffeehouse with the participation of officials from the Ministry of Environment, Urbanization, and Climate Change (Energy Investments Department), Aydın Provincial Directorate of Environment, Urbanization and Climate Change, representatives of the investing and consulting companies, the mukhtar, representatives of NGOs, members of the press, and the local residents. The key concerns voiced by the NGOs were potential impacts on olive groves and construction impacts on agricultural production.

The social consultants have continued to regularly visit the mukhtars and residents of the neighbourhoods that are in close proximity to the Project area (mainly Akköy and Akyeniköy). As reported in the temporary SEP, the Project Company continues to engage regularly with PAPs impacted by the Project. The social focal point of contact conducts regular meetings with the mukhtars to share information on the planned Project progress and receive requests or grievances (if any). Enerjisa Üretim continuously engages with all stakeholders, including PAPs, mukhtars, and public stakeholders. At a minimum, monthly face-to-face consultations are arranged locally to ensure all PAPs are well-informed about the Project. Moreover, the Project team is open to PAPs' concerns and requests and accommodates the request for minor changes to Project design to the extent possible.

As reported in the temporary SEP, the Project Company continuously collaborates with the stakeholder groups identified within the Project area, such as; South Ege Development Agency to gather region-specific information and foster valuable connections; the Governorship of Aydın and District Governorship of Didim, to provide a comprehensive briefing on the social projects undertaken by Enerjisa Üretim; and Efeler Diyarı Women's Cooperative for exploring collaboration prospects with the cooperative's leadership and members.

It is observed that the regular stakeholder engagement and social consultation that had started in earlier phases of the Project led the residents to have a more positive attitude toward the Project by understanding the potential Project impacts and contributions of the Project Company to the neighbourhoods.

The Social Impact Assessment and Field Reports prepared in 2022 by the Adam Smith Consultancy were provided to the Consultant for review. Accordingly, some of the neighbourhoods included in the Project's social Aol were visited. Following these visits, the Consultant carried out a field visit in December 2023 with the aim of identifying and updating the changes in the social baseline structure in the neighbourhoods over the past two years and in parallel to this, to determine the demands/grievances that may come from the stakeholders. In addition to this, the Consultant conducted a RRA study in February 2024 for the Project to identify the procedures for the resettlement process and the steps the Project Company will take to mitigate adverse impacts, compensate for losses, and provide development benefits to affected people and communities.

In brief, stakeholder engagement activities primarily focused on gaining approval from local stakeholders for the Project, whereas the Consultant's work centered around assessing the Project's social impacts, including aspects like land acquisition and the Project's impact on the local economy. The Consultant also proposed measures to mitigate any adverse impacts.

4.3 Stakeholder Engagement Activities during ESIA

Mott MacDonald Social Team conducted a site visit on 07 December 2023 within the scope of the ESIA study of the Project. During the site visit only the mukhtar and local residents of Akköy neighbourhood were visited by the Consultant. This limitation in site visits can be attributed to various factors such as time constraints and logistical challenges. However, despite this limitation, the potential information gaps were effectively addressed through various strategies. Primarily, the Consultant relied on extrapolation of interview results to gain a broader understanding of the overall situation since the neighbourhoods in the scope of the Project have similar baseline characteristics. Additionally, secondary data sources were extensively utilized to supplement the information obtained on-site. These sources included reports, studies, and statistical data that provided a holistic perspective on the broader context. Some of the statistical data was available at district level and these were obtained from the governmental institutions' websites and Turkish Statistical Institute (TurkStat) database; they do not cover certain issues on social environment such as gender aspect, vulnerable groups, workforce distribution, and unemployment rates. Similarly, the statistical data at neighbourhood level either remain as limited for some indicators (i.e., gender) or are based on estimated/ approximate numbers (i.e., educational level, vulnerable groups, workforce distribution, unemployment rates) since majority of these data were gathered through the verbal statements of the mukhtars or representatives of the governmental authorities rather than the officially registered data.

Through the combined approach of extrapolation from interviews and the use of secondary data, the potential information gaps resulting from limited site visits were effectively mitigated. This ensured that the findings and conclusions derived from the assessment were as comprehensive and accurate as possible.

The aim of the site visit included collecting baseline data about the Project affected neighbourhoods, understanding the Project-related concerns and expectations of the local community members, reflecting the views of key stakeholders, and identifying vulnerable groups. In line with these aims, mukhtars and local residents of Akköy neighbourhood were consulted during the site visit in order to identify local community members and other Project stakeholders, understand their perceptions about the Project, address any concerns they may have about the Project, and identify the Project impacts. The difficulty in conducting interviews with some stakeholder groups affected by the Project (e.g., vulnerable groups, NGOs) due to time constraints and logistical challenges remained as a limitation of the consultation study.

The main findings of these consultations are summarized below:

- The residents were informed about the Project about two years ago.
- Olive cultivation is the main source of livelihood in the region. Olive trees are not located in the Project area, but access roads pass through olive groves which may lead to dust impacts.
- They are aware of the Project's grievance mechanism. There is a grievance box located in the neighbourhood; however, it is observed as not effectively functioning. Rather, residents usually prefer to get in contact with the mukhtar, and the mukhtar communicates with the Project Company representatives.
- Consulted residents had some concerns that all of their lands will be expropriated. In addition, the possibility of expropriation of the road, which is considered as sacred by the residents, is among the concerns of the residents. Within the scope of the Project, that area is a protected area, and the necessary mitigation measures will be taken into consideration within the scope of the Project to protect the road.
- During the site visit, it was not possible to reach out all directly affected local community members. However, this limitation is filled with the studies carried out within the scope of RRA site visits in February 2024. In addition to this, the stakeholders consulted in general

had limited knowledge on the applicability of international standards with relation to land acquisition.

- The following development areas were suggested and/or expected by the consulted stakeholders:
 - Establishing projects for the residents residing in the Project affected settlements to support their livelihood (i.e., allocating available spaces for the residents to sell their agricultural products in the regional and/or local market)
 - Providing support in terms of easier usage of the agricultural lands, which are rugged and difficult to use
 - Providing support for the improvement and revitalization of the agricultural cooperative on olive cultivation in Akköy neighbourhood, which is not very active. There are demands for improvement and revitalization of the cooperative.

The above-mentioned issues have been taken into consideration and elaborated in the relevant sub-sections of the *Chapter 13: Social Environment* within the ESIA Report of the Project.

4.4 ESIA Public Disclosure and Consultation

A disclosure package of the Project that includes the Final ESIA Report together with the SEP, Non-Technical Summary (NTS)⁷, Resettlement Framework (RF), Framework Biodiversity Action Plan (BAP), and stand-alone Critical Habitat Assessment (CHA) (both in English and Turkish) has been disclosed to the public through the Project Company's website. The objective was to enable the Project stakeholders to review the results of the ESIA study as well as to gather their comments and questions on the outcomes. The duration of the disclosure period had been determined to be 60 days for the Project.

During the disclosure period, the findings of the ESIA studies, potential impacts of the Project and mitigation measures to be applied have been shared in a public participation meeting which was held within the scope of the stakeholder engagement activities of the Project's ESIA process. Within the scope of RAP studies, separate disclosure activities will be conducted (i.e. consultation meetings, phone calls) and Project-specific RAP will be disclosed to the PAPs who are directly affected by the Project.

A public participation meeting for Akköy WPP was held on 30 July 2024 at Akköy Local Coffeehouse. The meetings have been announced by soft copy invitations via e-mails, hard copy invitations via correspondence and mails, and press release by national and local newspapers and media agencies. The invitation included a Project Information Document (PID) that involves brief information about the ongoing ESIA process as well as communication channels that the Project stakeholders can report their opinions and comments about the Project.

When selecting the meeting location, a nearby neighbourhood that is easily accessible to all stakeholders (especially those living in the Project's area of influence) was selected and transport service has been provided to enable individuals who are living in the other neighbourhoods and desire to participate in the meeting.

The public participation meetings^{8,9} involved the following processes:

⁷ Summaries of the Climate Change Risk Assessment (CCRA) and Human Rights Impact Assessment (HRIA) that are conducted within the scope of the Project will be covered as part of NTS.

⁸ Announcements for Public Participation Meeting in local newspapers are provided in Appendix 9.7.

⁹ Announcement for Public Participation Meeting in national newspapers: [ENERJISA ENERJİ ÜRETİM A.Ş. \(haberturk.com\)](http://enerjisa.enerji.uretim.as.com)



The public participation meetings carried out at Akköy Local Coffeehouse was well attended by the stakeholders who are affected by the Project's land acquisition activities, mukhtars of the affected settlements and stakeholders living in the vicinity of the Project area. Approximately 100 stakeholders along with consultants from Mott MacDonald and representatives from the Project Company participated in the meeting. The meeting started with opening remarks from representatives of the Project Company and was followed by presentations on ESIA findings and mitigations presented by the consultants of Mott MacDonald. However, the presentation was interrupted by the participants and the meeting could not be concluded.

There were some negative reactions against the Project raised by some of the stakeholders. These were mainly related to the possibility of additional expropriation process in the future, and land acquisition process of the Project. During the meeting, local people were once again informed about the contact number of the CLOs and communication channels of the Project Company.

During the Questions and Answers (Q&A) Session, CLOs, and Project Company representatives took notes of the comments and grievances and responded to the questions of the participants. Key concerns and requests raised by participating stakeholders during were as follows:

- **Expropriation / Land use:** The local community members were concerned if additional expropriation activities will take place in the future as Akköy WPP is already in operation. What is legally allowed within the Project license area for potential new developments, if any, in the future? Will there be any other developments within the license area in the future, e.g. solar power plant? Will the entire license area be used by Enerjisa for 49 years?
- **Biodiversity:** Will the Project have impacts on birds and migration routes?
- **Project development:** What will happen in the future if the allowed installed capacity for the region is increased? Have there been any local employment during construction? How is the local employment during operation?
- **Community development:** What have been done so far to support the development of the affected villages?

The public participation meeting was a notable event as it gave the opportunity to communicate with the stakeholders and listen to their concerns and expectations and provide information about the ongoing Project activities.

During the last six months including the 60-day disclosure period, seven requests have been registered in the request/grievance log. These requests mainly focus on the social support, construction, and restoration of the social infrastructural services (i.e., health centre, marketplace) in the Project affected neighbourhoods. All of the requests are open and are being evaluated by the CLOs to resolve the requests that are applicable in line with the mitigation measures. All activities carried out and all grievances received during the disclosure process of the Project have led to underlining the following issues:

- Engaging with all the stakeholders on a regular basis and keeping them informed about the grievance mechanism of the Project,
- Giving clear messages to the stakeholders about the Project and the actions to be taken, and,
- Creating a timetable to ensure that the stakeholders can follow the expropriation process.

Local community members were provided opportunities to interact with the Project Team on matters related to environmental and social aspects of the Project and provide inputs. The meeting minutes, which includes the stakeholders' questions and comments, were kept in a written formal document. In addition to the verbal statements during face-to-face meetings/visits, stakeholders also may comment to the ESIA via phone calls to the Project Company/CLOs, and e-mails to the Project Company.

The documents in the disclosure package are revised and finalized in line with the feedback from the Project stakeholders. Finalized disclosure package will also be published on the Project Company's website.

5 Stakeholder Engagement Programme and Disclosure Process

5.1 Overview

Stakeholder engagement is an ongoing component of the Project that needs to continue throughout the construction and operation phases. The stakeholder engagement activities conducted so far during the pre-construction phase have followed a local community member-centred and structured framework in line with the international requirements. The same approach will continue to be applied on site throughout the Project lifecycle.

The stakeholder engagement programme given in this section of the SEP summarizes key planned stakeholder engagement and consultation activities during the construction and operation phases. The programme will be reviewed on an annual basis during construction and on as-needed basis during both construction and operation in order to ensure that it remains valid and meets the needs of the Project.

The Project will follow a gender-sensitive approach, which is also reflected to the SEP and its content on the consultation activities. Gender aspect will be considered in the implementation of the SEP through a gender inclusive and participatory point of view. In parallel with this principle, a female CLO has been employed for the Project in order to undertake discussions with women in a more effective way during the lifetime of the Project. Please see Section 6.5 for contact details of the CLOs.

5.2 Community Liaison Officer (CLO)

The main point of contact for the Project stakeholders will be the Community Liaison Officers (CLOs). Two CLOs (a male and a female) have been employed within the scope of the Project, whose contact details are provided in Section 6.5. Accordingly, disclosure, consultation and engagement activities of the Project will also be managed by the CLOs on the basis of the stakeholder engagement and consultation program defined in Table 5.1 below. The CLOs will also be responsible for registering the stakeholder engagement and consultation activities into the Project-specific consultation log. The consultation form and consultation log utilized for the Project are provided in Appendices Section 9.1 and 9.2, respectively.

The Project Company will be involved in the stakeholder engagement and consultation activities when necessary.

5.3 Stakeholder Engagement and Consultation Program

The proposed implementation timetable and responsibilities for stakeholder engagement throughout the lifetime of the Project is outlined in Table 5.1 below.

Table 5.1: Stakeholder Engagement and Consultation Program Throughout the Lifetime of the Project

| No | Stakeholders | Issues to be consulted/discussed | Communication methods | Phase and frequency | Responsible |
|--------------------------|---|---|--|---|---|
| Local Communities | | | | | |
| 1 | Residents in the Project Affected Settlements (Akköy and Akyeniköy) | <ul style="list-style-type: none"> Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project, provisions to prevent the risks of GBVH Outline the mitigation measures identified in the ESIA report and ESMP Inform about the local employment and procurement Inform about the Retrospective Resettlement Assessment and compensation procedure Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.) | <ul style="list-style-type: none"> Face-to-face consultation meetings / participatory & dialogue based approach. Regular visits Disclosure of ESIA report together with its NTS (which also covers the summaries of CCRA and HRIA), SEP, PID/brochure and other Project related documents including RF, CHA Disclosure of the Project-specific RRA to the PAPs directly affected by the Project Website announcements Social media announcements Announcements through posters/ billboards/ press release | <ul style="list-style-type: none"> At least monthly (and when needed) during construction Quarterly during operation 3 days prior to risky construction activity | <ul style="list-style-type: none"> CLOs Project Company |
| | Local communities including PAPs subject to direct land acquisition | | | | |
| | Three informal users on three of the Project affected public lands identified within the scope of the RRA studies | | | | |
| | Structure owners whose structures are within the turbine setback area of the Project | | | | |
| 2 | Local Businesses and Enterprises (Local shops, beekeepers, income-generating agricultural lands) | <ul style="list-style-type: none"> Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project, provisions to prevent the risks of GBVH Outline the mitigation measures identified in the ESIA report | <ul style="list-style-type: none"> Face-to-face consultation meetings Regular visits Disclosure of ESIA report together with its NTS (which also covers the summaries of CCRA and HRIA), SEP, PID/brochure | <ul style="list-style-type: none"> At least monthly (and when needed) during construction Quarterly during operation 3 days prior to risky construction activity | <ul style="list-style-type: none"> CLOs Project Company |
| | Mukhtars of the Project Affected Settlements (Akköy and Akyeniköy) | | | | |

| No | Stakeholders | Issues to be consulted/discussed | Communication methods | Phase and frequency | Responsible |
|----|---|--|--|---|---|
| | | <ul style="list-style-type: none"> Inform about the local employment and procurement Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.) | <ul style="list-style-type: none"> and other Project related documents including RF, CHA Disclosure of the Project-specific RRA to the PAPs directly affected by the Project Website announcements Social media announcements Announcements through posters/ billboards/ press release | | |
| 3 | Vulnerable Groups (Women, the landless/homeless people, the elderly, students, people with disabilities, unemployed people) | <ul style="list-style-type: none"> Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, informing about grievance mechanism of the Project, provisions to prevent the risks of GBVH Specific interest to receive their grievances (if there are any) since they may not be able to use the grievance channels Outline the mitigation measures identified in the ESIA report Inform about the local employment and procurement Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.) | <ul style="list-style-type: none"> Face-to-face consultation meetings Regular visits Disclosure of ESIA report together with its NTS (which also covers the summaries of CCRA and HRIA), SEP, PID/brochure and other Project related documents including RF, CHA Disclosure of the Project-specific RRA to the PAPs directly affected by the Project Website announcements Social media announcements Announcements through posters/ billboards/ press release Specific focus group meetings held with women groups and other particular vulnerable groups | <ul style="list-style-type: none"> Bi-monthly during construction Semi-annually during operation 3 days prior to risky construction activity | <ul style="list-style-type: none"> CLOs Project Company |

| No | Stakeholders | Issues to be consulted/discussed | Communication methods | Phase and frequency | Responsible |
|----------------------------|--|---|---|--|---|
| 4 | Other potentially affected local social institutes (Schools, mosques, local coffeeshops) | <ul style="list-style-type: none"> Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project, provisions to prevent the risks of GBVH Outline the mitigation measures identified in the ESIA report Inform about the local employment and procurement Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.) | <ul style="list-style-type: none"> Face-to-face consultation meetings Regular visits Disclosure of ESIA report together with its NTS (which also covers the summaries of CCRA and HRIA), SEP, PID/brochure and other Project related documents including RF, CHA Website announcements Social media announcements Announcements through posters/ billboards/ press release Specific meetings held with children (student) groups | <ul style="list-style-type: none"> Bi- monthly (and when needed) during construction Quarterly during operation 3 days prior to risky construction activity | <ul style="list-style-type: none"> CLOs Project Company |
| Governmental Bodies | | | | | |
| 5 | Governmental bodies and stakeholders at national level | <ul style="list-style-type: none"> Conduct consultation on Project stages Provide information on potential impacts of the Project as well as on the grievance mechanism of the Project | <ul style="list-style-type: none"> Face-to-face consultation meetings Regular visits Disclosure of ESIA report together with its NTS (which also covers the summaries of CCRA and HRIA), SEP, PID/brochure and other Project related documents including RF, CHA Correspondence | <ul style="list-style-type: none"> Annually during construction When needed during operation | <ul style="list-style-type: none"> CLOs Project Company |
| 6 | Governmental bodies and stakeholders at provincial and district level | <ul style="list-style-type: none"> Conduct meetings and correspondence for Project permits, consultation on the Project stages Provide information on environmental and social impacts of the Project, mitigation measures defined in the ESIA report, Project grievance mechanism | <ul style="list-style-type: none"> Face-to-face consultation meetings Regular visits Disclosure of ESIA report together with its NTS (which also covers the summaries of CCRA and HRIA), SEP, PID/brochure | <ul style="list-style-type: none"> Every six months during construction Annually during operation | <ul style="list-style-type: none"> Project Company |

| No | Stakeholders | Issues to be consulted/discussed | Communication methods | Phase and frequency | Responsible |
|---------------------|-------------------------|--|--|---|---|
| | | | <ul style="list-style-type: none"> and other Project related documents including RF, CHA Correspondence | | |
| 7 | District Municipalities | <ul style="list-style-type: none"> Conduct meetings and correspondence for Project permits, consultation on the Project stages Provide information on environmental and social impacts of the Project, mitigation measures defined in the ESIA report, Project grievance mechanism Organized meetings for grievances reported to the municipal units and receiving opinions and recommendations | <ul style="list-style-type: none"> Face-to-face consultation meetings Regular visits Disclosure of ESIA report together with its NTS (which also covers the summaries of CCRA and HRIA), SEP, PID/brochure and other Project related documents including RF, CHA Correspondence | <ul style="list-style-type: none"> Every six months during construction Annually during operation | <ul style="list-style-type: none"> CLOs Project Company |
| Universities | | | | | |
| 8 | Universities | <ul style="list-style-type: none"> Conduct consultation on Project stages Organize meetings about the research needs to be conducted within the scope of the Project. Provide information possible impacts of the Project, information on the grievance mechanism of the Project | <ul style="list-style-type: none"> Face-to-face consultation meetings Regular visits Disclosure of ESIA report together with its NTS (which also covers the summaries of CCRA and HRIA), SEP, PID/brochure and other Project related documents including RF, CHA Website announcements Correspondence | <ul style="list-style-type: none"> When needed during construction and operation | <ul style="list-style-type: none"> CLOs Project Company |
| NGOs | | | | | |
| 9 | NGOs | <ul style="list-style-type: none"> Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project | <ul style="list-style-type: none"> Face-to-face consultation meetings Regular visits | <ul style="list-style-type: none"> When needed during construction and operation | <ul style="list-style-type: none"> CLOs Project Company |

| No | Stakeholders | Issues to be consulted/discussed | Communication methods | Phase and frequency | Responsible |
|------------------------------|---------------|---|--|---|---|
| | | <ul style="list-style-type: none"> Outline the mitigation measures identified in the ESIA report | <ul style="list-style-type: none"> Disclosure of ESIA report together with its NTS (which also covers the summaries of CCRA and HRIA), SEP, PID/brochure and other Project related documents including RF, CHA Website announcements Social media announcements Announcements through posters/ billboards/ press release | | |
| Media | | | | | |
| 10 | Media | <ul style="list-style-type: none"> Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project Outline the mitigation measures identified in the ESIA Report Engage with local and regional media organizations for effective public disclosure and consultation | <ul style="list-style-type: none"> Face-to-face consultation meetings Regular visits Disclosure of ESIA report together with its NTS (which also covers the summaries of CCRA and HRIA), SEP, PID/brochure and other Project related documents including RF, CHA Website announcements Social media announcements Announcements through posters/ billboards/ press release | <ul style="list-style-type: none"> When needed during construction and operation | <ul style="list-style-type: none"> CLOs Project Company |
| Internal Stakeholders | | | | | |
| 11 | Project Staff | <ul style="list-style-type: none"> Provide information about the Project updates and changes in operations with regard to labour rights, information on contracts, code of conduct, including provisions for GBVH | <ul style="list-style-type: none"> Trainings Face-to-face consultation meetings | <ul style="list-style-type: none"> Monthly during construction When needed during operation | <ul style="list-style-type: none"> Project Company and relevant departments (i.e., Human Resources Department) |

| No | Stakeholders | Issues to be consulted/discussed | Communication methods | Phase and frequency | Responsible |
|----|--|---|--|---------------------|-------------|
| | Contractors and subcontractors and their employees | <ul style="list-style-type: none"> • Disclose the grievance mechanism of the Project | <ul style="list-style-type: none"> • Disclosure of ESIA report together with its NTS (which also covers the summaries of CCRA and HRIA), SEP, PID/brochure and other Project related documents including RF, CHA • Announcements through posters/ billboards/ press release • Announcements on the Project area | | |
| | Suppliers and their workers | | | | |

6 Project Grievance Mechanism

6.1 Overview

The Project Company is required to establish an effective and accessible grievance mechanism as a part of the stakeholder engagement, information disclosure and consultation. The aim of the grievance mechanism is to provide channels that are free of manipulation, coercion, and intimidation in which Local community members can report their requests, concerns and grievances regarding the Project and its impacts. Responding to grievances and resolving them in a timely, proactively, unbiased, effective, and efficient manner is essential according to the international standards and requirements on stakeholder engagement. Specifically, it provides a transparent and credible process for fair and sustainable outcomes. By this way, trust and cooperation could be mutually developed among the Project stakeholders and the Project Company through corrective actions. Main components of a successful grievance mechanism also include anonymity, confidentiality, and transparency principles.

According to the temporary SEP that has been in place since October 2023, the Project Company has a grievance mechanism for the Project stakeholders. There is a grievance register form used for registration of the grievance. The form is saved within the eBA software system of the Project Company, which is used for documentation and workflow management. Samples of the grievance register, and closure forms are presented in Appendices Section 9.3 and 9.4, respectively.

Grievance register form includes the signature of the applicant for the grievances received through meetings and visits. However, receiving the signature of the applicant is not applicable within the scope of the international standards on stakeholder engagement and grievance mechanism management. Also, the part in the form that requires information about the applicant shall be left blank in the cases where the applicant would like to raise grievance anonymously. The gender part is included in the form to categorize the grievances by gender of the applicants and take gender-sensitive measures in times of necessity. The grievance register form is revised in accordance with these principles.

Grievances are categorized as external and internal depending on the type of the stakeholder. Since they have different grievance channels and resolution processes, they are defined in Sections 6.3 and 6.4 separately.

6.2 Principles of the Grievance Mechanism

To ensure compliance with the international standards (particularly IFC PS1, PS2, and PS5, EBRD PR10, EP IV Principles 5 and 6, and DFC ESPPs 3 and 5), there are a number of principles that the Project Company will apply to the Project's grievance mechanism in general. These principles can be summarized as follows:

- There will be a formalized and written Project Grievance Mechanism Procedure that involves the principles of the mechanism (including anonymity), available channels with contact details of the CLOs, defined timeframes for acknowledgement of the receipt of complaints and subsequent resolution, sample subjects that describes the type of grievance as per the identified Project impacts (i.e., noise, air, visual, dust, GBVH, labour management, and traffic), and management and resolution process together with the assigned responsible Project staff.
- Grievance mechanism will be committed to confidentiality and anonymity. Grievance channels both online and offline will be enabled to receive anonymous applications.

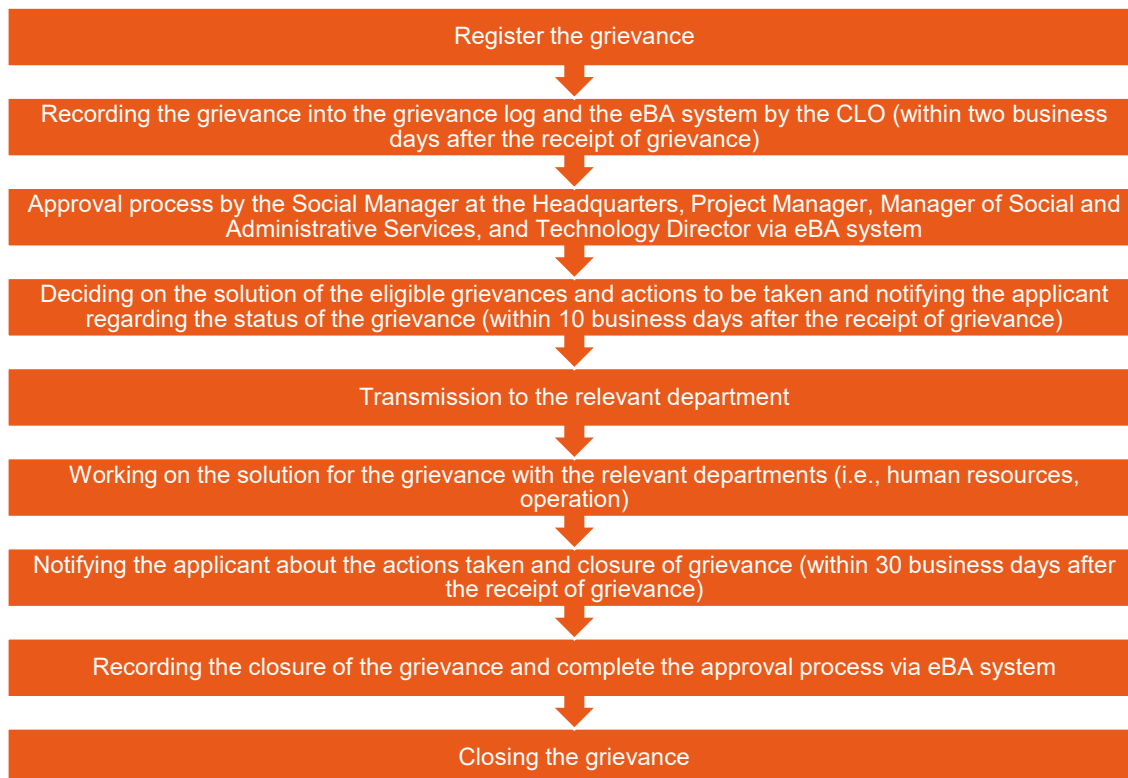
- It is crucial to provide appropriate environment where all internal and external stakeholders can easily report any GBVH-related grievance in a safe and confidential way when they need. GBVH cases will be registered and processed as a part of the current grievance mechanism. However, they will be approached in a more sensitive way and in an immediate time manner through ensuring confidentiality, non-retaliation, protection, and supervision of victims, and utilize legal expertise when needed. A female CLO has been employed for the Project in order to work more effectively with women in case if a GBVH incident occurs during the lifetime of the Project. Please see Section 6.5 for contact details of the CLOs.

6.3 External Grievance Mechanism

External stakeholders can use the grievance mechanism through the following channels:

- The grievance form disclosed on the Project website¹⁰ that enables anonymous grievance applications
- Verbal statements during face-to-face meetings/visits
- Phone calls and/or online messages (i.e., via WhatsApp) to the Project Company/CLOs
- Petitions
- Posters¹¹ that are hung in common areas of the Project affected neighborhoods, indicating what the clear communication channels are
- E-mails to the Project Company

The steps listed below summarize the external grievance mechanism process:



¹⁰ Project website can be accessed via <https://yekares2.enerjisauretim.com>. The link of the grievance form on the Project website will be included once finalized.

¹¹ Poster is given in Appendices Section 9.5.

Figure 6.1: Steps of the External Grievance Mechanism Process

Should the Company be unable to resolve a complaint, or if the stakeholder is not satisfied with the outcome, the Company may consider seeking advice from other independent parties (i.e., local legal institutions and/or well-regarded NGOs) for further investigation, root cause analysis or actions in line with the good international practices on grievance management. Applicants always have the right to appeal to local or relevant legal authorities for a solution with which they are not satisfied.

Stakeholder request and grievance register log of the Project Company to be utilized throughout the Project is provided in Appendices Section 9.6.

As part of the Project's external grievance mechanism:

- The Project CLOs will manage and monitor the grievance mechanism process in a close way since they are the main contact points on site for the stakeholders.
- All grievances will be reviewed to be classified whether they are genuine and related to the Project activities or not. If the issues/disputes raised are not related to the Project activities, kind guidance is provided to the applicant to contact relevant party.
- For eligible grievances, CLOs will assign actions to the relevant Project Company staff (depending on the subject of the grievance) for their assessment and clarification of the grievance resolution actions.
- Within a maximum of ten business days, CLOs will inform the applicant on resolution actions taken/to be taken. If the case requires a more complex investigation, this is also conveyed to the applicant. It is ensured that applicant is provided with updated information at each step of the process until the clarification of resolution actions.
- In general, grievances are estimated to be resolved and closed within 30 business days after the receipt. However, the timeline can change depending on the nature, subject and scope of the grievance (i.e., the applicant's physical unavailability at the location of the grievance, inconvenient land/seasonal conditions, need for third-party assessments, arrangement of schedule for maintenance/repair works). Accordingly, the Project Company will make a prioritization among the grievances by considering their nature, subject matters, and scope. The resolution period for the grievances with high priority will be revised as seven business days after the receipt of the grievance. For the grievances with medium priority, timeline will be 15 business days and the grievances that are prioritized as low will be resolved within 30 business days.

6.4 Internal Grievance Mechanism

Internal grievance mechanism covers the grievances of all employees working under the Project Company, its contractors, subcontractors, and suppliers. The Project Company has formal employee grievance mechanisms. As specified in the temporary SEP, some of these practices are applied within the Project area. However, some improvement areas have been notified during the ESIA process of the Project, which are detailed in the ESIA Report. Internal grievance channels include grievance boxes located in common Project areas (i.e., camps, refectory) that are checked on a weekly basis, e-mail address, an online form, employee committee meetings, reporting grievances to the managers and Human Resources Department representatives verbally or in a written way, eBA Suggestion System of the Project Company, and grievance boxes placed at the Project mobilization areas. The Human Resources Department will be the main implementation body for the Internal Grievance Mechanism of the Project.

The following will be applied for all grievance channels for the successful implementation and management of internal grievance mechanism:

- Grievances will be classified and prioritized depending on their subjects while registering to the grievance log. Accordingly, resolution period for the grievances with high priority is recommended to be seven days after the receipt of the grievance. For the grievances with medium priority, it is 15 days and the grievances that are prioritized as low can be resolved within 30 days.
- After the grievances are successfully closed and the corrective actions are taken, the results of the grievances including anonymous grievances will be displayed on the notice boards within the Project site.

In summary, all Project staff will be able to report their grievances through one-to-one meetings, petitions, telephone calls, e-mails, online forms that enable anonymous grievance applications, grievance boxes located in common Project areas (i.e., camps, refectory) that are checked on a weekly basis, and collective meetings. The Project Company aims at creating a positive working environment based on open and continuous communication.

6.5 Grievance Mechanism Channels and CLO Contact Details

The channels listed below can be used for receiving grievances. As stated in the temporary SEP, the Corporate Communication Department of the Project Company manages these grievances per the Corporate Communication Procedure and Crisis Management Procedure.

Grievance Mechanism Channels

- Official letter and/or petition to;
 - The Head Office (Barbaros Mah, My Office İş Merkezi, Çiğdem Sok. No:1/16 34746 Ataşehir/İstanbul), or
 - The Project Administration Office (Akköy Mahallesi Yeşilkavak Sokak No:28 Didim/Aydın)
- Phone number of the Head Office: (0216) 512 40 00
- Project e-mail address: yekares2@enerjisauretim.com
- Project website: <https://yekares2.enerjisauretim.com>
- The grievance form disclosed on the Project website that enables anonymous grievance applications
- Posters that are hung in common areas of the Project affected neighbourhoods (i.e., teahouses and/or mukhtars' offices), indicating what the clear communication channels are

Contact Details of the CLOs

The information contained herein is excluded from the publicly disclosed version of this document in compliance with personal data protection regulations.

7 Resources and Responsibilities

The Project Company will have the overall responsibility and commitment to actualize effective stakeholder engagement as defined in this SEP and in line with the IFC PS1, EBRD PR10, EP IV Principles and 5 and 6, and DFC ESPPs 3 and 5 requirements.

The Project Company will employ the CLO for the Project, who will undertake and supervise engagement with all stakeholders in relation to the Project and use available resources to ensure that the relevant activities are conducted effectively. Other responsibilities of the CLO are as follows:

- Conducting stakeholder engagement and disclosure activities with stakeholders
- Following the grievances and requests from registration through the resolution process
- Awareness raising campaigns among the Project workforce on the stakeholder engagement and grievance mechanism principles
- Responsibility for the preparation of the Project-specific grievance and consultation logs to be used during internal/external reporting
- Responsibility for the preparation of the Project-specific stakeholder engagement and consultation reports to be shared internally and with the Lenders
- Informing the relevant managers of the Project Company for development and implementation of additional measures when necessary, in order to resolve community-related issues, including measures aimed at resolving non-closed grievances
- Coordinating with parties for proper implementation of the SEP

Together with the CLOs, the parties of interest for the implementation of the SEP during construction, and operation phases of the Project are listed below with the explanation of their responsibilities:

Project Manager

- Holding regularly scheduled meetings with the CLOs to supervise and evaluate the quality and impact of stakeholder engagement activities.
- Conducting monthly meetings to address and monitor any complaints received by the CLOs. Furthermore, holding meetings with the headquarters to tackle high-level complaints and explore holistic solutions.

Corporate Social Manager at the Headquarters of the Project Company

- Determining and allocating the necessary resources for effective implementation of this SEP
- Evaluation of the compliance of the Project's stakeholder engagement and consultation activities with national legislation and international standards,
- Monitoring all grievances and ensuring that all grievances are recorded, resolved and closed

E&S Compliance Manager at the Headquarters of the Project Company

- Monitoring the quality assurance of the SEP for effective implementation
- Reviewing the internal reports prepared by the CLOs

8 Monitoring and Reporting

The Project Company will be responsible for monitoring, evaluation and reporting activities, overseeing progress related to the Project activities, outcomes, and results.

The monitoring and reporting process of the stakeholder engagement plan is essential for accurately identifying the demands of stakeholders, developing strategies to respond to their needs, and actively involving stakeholders in all stakeholder engagement processes by building effective communication strategies. Stakeholders should be informed about the Project's development stages, potential impacts (involving community health and safety risks), communication channels with stakeholders, and grievance mechanism of the Project, provisions to prevent the risks of GBVH during the process through face-to-face consultation meetings, regular visits, disclosure of the ESIA report, SEP, PID/brochure and other Project related documents, website and social media announcements, and announcements through posters/ billboards/ press release.

To ensure a comprehensive understanding of stakeholder needs, it is important that the tools used for monitoring capture relevant information about their expectations, experiences, and satisfaction levels. Conducting focus groups and one-on-one interviews with key stakeholders can provide valuable and personalised feedback. Additionally, by establishing feedback channels, such as suggestion boxes, customer service hotlines, or online platforms, can encourage stakeholders to provide ongoing feedback. In this way, it will also be possible to assess the involvement and the perception of the stakeholders as well as the level of collaboration and partnerships established with them.

This SEP is a live document; therefore, it will be reviewed and updated by including the stakeholder engagement activities carried out at least on a six-monthly basis during the construction, and when needed during operation phases of the Project. The updated version will be published on the Project website on an annual basis. The SEP will be monitored by the relevant representatives of the Project Company to maintain effectiveness and quality.


The CLOs will also prepare reports on a semi-annual basis during construction phase and on an annual basis during operation phase, which will summarize the following:

- The number of Project-related grievances received within the particular reporting period, their resolution status with actions taken/ to be taken, and the number of those resolved within the prescribed timeline
- Stakeholder engagement, consultation and disclosure activities are conducted within the particular reporting period together with the outcomes of these activities
- Regular E&S performance reports (i.e., covering a wider range of E&S issues) for dissemination among local stakeholders

These reports will be shared with the relevant representatives of the Project Company and the Lenders for monitoring the ongoing progress on the stakeholder engagement and consultation activities.

9 Appendices

9.1 The Consultation Form of the Project Company

|  | | ENERJİSA ÜRETİM | | |
|---|--|---|--|--|
| İSTİŞARE KAYIT FORMU Consultation Form | | | | |
| Formu Dolduran Kişi Person Filling Out the Form | | Tarih Date | | |
| Toplantı Gündemi Meeting Agenda | | Görüşme Kayıt No Consultation Register Number | | |
| 1- Toplantı Bilgileri Meeting Information | | | | |
| Yetkili Kişinin Adı Name of Authorized Person | | | | İletişim Şekli Type of Communication |
| İstişare Edilen Kurum Institution Consulted | | | | <input type="checkbox"/> Yüz Yüze Face-to-Face |
| Telefon/E-posta Phone/Email | | | | <input type="checkbox"/> Telefon Phone |
| Köy-Mahalle/İlçe/İl Village/District/Province | | | | <input type="checkbox"/> Diğer Other |
| Paydaş Tipi Type of Stakeholder | | | | |
| <input type="checkbox"/> Kamu Kurumu Public Institution | <input type="checkbox"/> PEK PAP | <input type="checkbox"/> STK Association/NGO | <input type="checkbox"/> İlgili Grup Related Group | <input type="checkbox"/> Oda/Meslek Birlikleri Chamber/Professional Body |
| <input type="checkbox"/> Yüklenici/Alt Yüklenici Contractor/Subcontractor | <input type="checkbox"/> İşçi Sendikası Labour Union | <input type="checkbox"/> Medya Media | <input type="checkbox"/> Üniversite University | <input type="checkbox"/> Diğer Other |
| 2- İstişare Detayları Details of the Consultation | | | | |
| Konu Subject | | | | |
| Geri Bildirim Feedback | | | | |
| Not Note | | | | |

9.2 Project Consultation Log of the Project Company

| Stakeholder Type | Institution Consulted | Stakeholder | Gender | Phone | Communication Channel | Date | Agenda Of the Meeting | Number Of Stakeholders Engaged | Team | Person Filling Out the Form | Details Of the Consultation |
|------------------|-----------------------|-------------|--------|-------|-----------------------|------|-----------------------|--------------------------------|------|-----------------------------|-----------------------------|
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9.3 Revised Project Grievance Register Form

| A. General Information | |
|---|---|
| Project Name | |
| Name of the Recorder | |
| Form Registry No | |
| Date of Register | |
| Place of Register | <input type="checkbox"/> Project office <input type="checkbox"/> Other: Please specify the location |
| B. Means of Receiving Grievance | |
| <input type="checkbox"/> Telephone <input type="checkbox"/> Petition (Please attach one copy to this form) | <input type="checkbox"/> Face-to-face meetings (site visits) <input type="checkbox"/> Community meetings (Public Information Meetings etc.) <input type="checkbox"/> E-mail <input type="checkbox"/> Other: Please specify |
| C.1. Information about the Applicant (Please do not fill for anonymous applications) | C.2. Stakeholder Category |
| Name | <input type="checkbox"/> Local governmental authorities <input type="checkbox"/> Local residents <input type="checkbox"/> Non-governmental organization <input type="checkbox"/> Project Employees <input type="checkbox"/> Workers of contractors/subcontractors <input type="checkbox"/> Consultant <input type="checkbox"/> Media <input type="checkbox"/> Other: Please specify |
| Gender | |
| Contact Information | |
| Address | |
| Neighbourhood/ District/ Province | |
| Phone number: E-mail address: | |
| D.1. Information about Grievance | D.2. Grievance Category |
| | <input type="checkbox"/> Damage to land/crop/structure <input type="checkbox"/> Damage to access roads <input type="checkbox"/> Environmental impacts (pollution, dust, noise) <input type="checkbox"/> Use of lands without owner's consent and legal permission <input type="checkbox"/> Restricting access to natural resources/lands <input type="checkbox"/> Payment of usage fee or compensation <input type="checkbox"/> Expropriation <input type="checkbox"/> Resettlement <input type="checkbox"/> Demand for job or work from local <input type="checkbox"/> Working conditions <input type="checkbox"/> Laying off <input type="checkbox"/> Non-payments of workers' wages <input type="checkbox"/> Debt to local suppliers or subcontractors <input type="checkbox"/> Demanding any supports on education <input type="checkbox"/> Demanding any supports for households/individuals <input type="checkbox"/> Demanding any supports for neighbourhood/community <input type="checkbox"/> Demanding any supports for local authorities <input type="checkbox"/> Other: Please specify |
| E. Actions Recommended | |
| | |

9.4 Project Grievance Closure Form

| | | |
|---|--|-------------------|
| Name of the Recorder: | | |
| Date of Register: | |/...../..... |
| GRIEVANCE/REQUEST CLOSURE | | |
| <p>In this section of the Closing Form, information on how the grievance was resolved or how the request was met will be included; if there is an expenditure made, its information will be entered; an explanation that the grievance/request is agreed with the grievance/request owner will be written and signed by grievance or request owner and the relevant Enerjisa Üretim employee and closed.</p> <p>(For grievances received over the Internet, an e-mail response will be expected instead of a signature)</p> | | |
| Actions Taken for Grievance/Request | Relevant Departments /Contractors/ Subcontractors | |
| 1- | | |
| 2- | | |
| 3- | | |
| 4- | | |
| Amount of Expenditure: | | |
| Grievance/Requestor Name and Surname | On behalf of Enerjisa Üretim Title-Name-Surname and Signature | |

9.5 Posters That Are Hung in Common Areas of The Project Affected Neighbourhoods

**PROJE İLE İLGİLİ ŞİKAYET
VE TALEPLERİNİZ İÇİN
BİZİ ARAYABİLİRSİNİZ**

**YENİLENEBİLİR ENERJİ
KAYNAK ALANLARI 2
AKKÖY RÜZGAR
ENERJİ SANTRALİ PROJESİ
İLE İLGİLİ HER KONUDA
BİZİMLE DOĞRUDAN
İLETİŞİME GEÇEBİLİRSİNİZ**

HALKLA İLİŞKİLER UZMANLARIMIZ

The information contained herein is excluded from the publicly disclosed version of this document in compliance with personal data protection regulations.

ENERJİ SA ÜRETİM

9.6 Stakeholder Request and Grievance Register Log of the Project Company for the Project

| Project | City | District | Village | Stakeholder | Gender | Phone | Communication Channel | Priority | Status | Repetition | Assigned By | Assigned To | Subject | Subject Detail | Message | CLO Remarks | Date Opened | Due Date | Date Closed | Overdue Day(s) | Open For ... Day(s) ... | Taken Actions | Responsible Company - Department | Does It Need To Be Followed Up? | |
|---------|------|----------|---------|-------------|--------|-------|-----------------------|----------|--------|------------|-------------|-------------|---------|----------------|---------|-------------|-------------|----------|-------------|----------------|-------------------------|---------------|----------------------------------|---------------------------------|--|
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9.7 Local Newspaper Announcement for the Project

DUYURU

ÇEVRESEL VE SOSYAL ETKİ DEĞERLENDİRMESİ SÜRECİ TOPLUMLA İSTİŞARE TOPLANTISI

Enerjisa Üretim tarafından etki alanı yerleşimleri Aydın ili, Didim ilçesi, Akköy, Akyeniköy ve Yalıköy mahalleleri olarak belirlenen; 6 adet türbin ve 25.2 MW kurulu güce sahip Akköy Rüzgar Enerjisi Santrali Projesi işletmeye alınmıştır.

Söz konusu proje için çevresel ve sosyal etkilerinin kapsamlı bir şekilde tespit edilebilmesi amacıyla uluslararası standartlarla uyumlu Çevresel ve Sosyal Etki Değerlendirmesi (ÇSED) çalışmaları yürütülmüştür. ÇSED sürecimizin bir parçası olarak; çalışmalarımızın sonuçlarını paylaşmak, projemizle ilgili bilgi aktarımı yapmak ve sizlerin değerli görüşlerini yüz yüze almak için aşağıda belirtilen tarih ve saatte bir istişare toplantısı yapılacaktır.

Halkımıza saygı ile duyurulur.

| | |
|---|---|
| Toplantı Yeri | : Akköy Köy Kahvesi |
| Toplantı Yerinin Adresi | : Akköy / Didim / Aydın |
| Toplantı Tarihi | : 30/07/24 |
| Toplantı Saati | : 13:30 |
| Proje Sahibi | : Enerjisa Enerji Üretim A.Ş. |
| Tel | : 0 216 512 40 00 |
| Faks | : 0 216 266 84 14 |
| ÇSED Raporunu Hazırlayan Kuruluş | : Mott MacDonald T Danışmanlık Mühendislik Ltd. Şti. |
| Tel | : 0 216 766 31 18 |

Resmi İlanlar : www.ilan.gov.tr'de Basın : 2064274

