

Stakeholder Engagement Plan

September 2024

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# Uygar Wind Power Plant (WPP) Project - Environmental & Social Impact Assessment (ESIA) Study

Stakeholder Engagement Plan

September 2024

### Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
A	December 2023	Ece Alper Ece Catakli Evren Kayas Bianca Barsanogullari	Mustafa Islek	Hande Hatipoglu	Draft Stakeholder Engagement Plan for Client Review
В	April 2024	lpek Kullu Ece Alper Ece Catakli Evren Kayas	Mustafa Islek	Hande Hatipoglu	Revised Draft Stakeholder Engagement Plan after Lenders' Comments
С	May 2024	Ece Alper Ece Catakli Evren Kayas	Mustafa Islek	Hande Hatipoglu	Revised Draft Stakeholder Engagement Plan after Lenders' Comments
D	June 2024	Ece Alper Ece Catakli Evren Kayas	Mustafa Islek	Hande Hatipoglu	Final Draft Stakeholder Engagement Plan for the Project Disclosure
E	September 2024	Ece Alper Ece Catakli Evren Kayas	Mustafa Islek	Hande Hatipoglu	Final Stakeholder Engagement Plan for the Project Disclosure

Document reference: 221100030 | SEP | E |

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### **Contents**

Lis	t of Ac	ronyms	vii
1	Intro	oduction and Project Summary	1
	1.1	Overview	1
	1.2	Objectives and Scope of the Stakeholder Engagement Plan	5
	1.3	Project Location and Social Area of Influence	6
	1.4	Expected Project Impacts and Summary of Mitigations	7
2	Stak	ceholder Engagement Requirements	14
	2.1	Overview	14
	2.2	Applicable Guidelines and Standards	14
		2.2.1 National Requirements	15
		2.2.2 International Requirements	16
		2.2.3 Applicable Policies and Management Systems of the Project Company	17
3	Stak	ceholder Identification and Analysis	19
	3.1	Overview	19
	3.2	Project Stakeholders	19
4	ESIA	A Consultation Activities and Outcomes	25
	4.1	Overview	25
	4.2	Previously Carried out E&S (Environmental and Social) Activities	25
	4.3	Stakeholder Engagement Activities during ESIA	27
	4.4	ESIA Public Disclosure and Consultation	29
5	Stak	ceholder Engagement Programme and Disclosure Process	33
	5.1	Overview	33
	5.2	Community Liaison Officers (CLOs)	33
	5.3	Stakeholder Engagement and Consultation Program	33
6	Proj	ect Grievance Mechanism	40
	6.1	Overview	40
	6.2	Principles of the Grievance Mechanism	40
	6.3	External Grievance Mechanism	41
	6.4	Internal Grievance Mechanism	42
	6.5	Grievance Mechanism Channels and CLOs Contact Details	43

7	Reso	urces and Responsibilities	44
8	Moni	toring and Reporting	45
9	Appe	ndices	46
	9.1	The Consultation Form of the Project Company	47
	9.2	Project Consultation Log of the Project Company	48
	9.3	Revised Project Grievance Register Form	49
	9.4	Project Grievance Closure Form	50
	9.5	Posters That Are Hung in Common Areas of The Project Affected Neighbourhoods	51
	9.6	Stakeholder Request and Grievance Register Log of the Project Company for the Project	52
Tabl			
Table (AoI)	e 1.1: At	fected Districts and Neighbourhoods in the Project's Social Area of Influence	6
Table	1.2: S	ummary of the Project's Social Impacts	8
Table	3.1: E	kternal Stakeholder List for Governmental Authorities	19
Table	3.2: E	kternal Stakeholder List for Non-Governmental Bodies	22
Table	3.3: O	ther External Stakeholder Groups	23
Table	3.4: In	ternal Stakeholder List	24
	5.1: Stroject	takeholder Engagement and Consultation Program Throughout the Lifetime of	34
	. 2,200		3.
Figu	res		
Figur	e 1.1: F	Project Organisational Chart	4
Figur	e 6.1: S	steps of the External Grievance Mechanism Process	41

## **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)
RAP	Resettlement Action Plan
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
TEIAŞ	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 Balıkesir 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". Upon this award, the "Agreement on Allocation of Renewable Energy Resource Areas and Connection Capacity Based on Wind Energy in Balıkesir Connection Area" was signed between EN 1 Rüzgar Enerjisi Yatırım A.Ş. and Ministry of Energy and Natural Resources (MoENR) on 9 May 2020. Subsequently, EN 1 Rüzgar Enerjisi Yatırım A.Ş. has been merged with Enerjisa Enerji Üretim Anonim Şirketi ("Enerjisa Üretim" or "the Project Company") upon the decision from Republic of Türkiye Istanbul Trade Registry Directorate dated 30 December 2022.

Uygar Wind Power Plant (WPP) Project ("the Project") with 60 turbines and 252 MW<sub>m</sub>/250 MW<sub>e</sub> total installed power, is planned to be implemented by Enerjisa Üretim in Balıkesir province, Burhaniye and Savaştepe districts, Haydar, İkizce, Büyükyenice and Taşdibi neighbourhoods; İzmir province, Bergama district, Oruçlar, Ürkütler, Yukarıada, İneşir, Alhatlı, Durmuşlar, Çamoba and Kozluca neighbourhoods; Manisa province, Soma district, Kiraz neighbourhood. 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 Aegean Region of western Türkiye; aiming to harness the wind energy potential of the region.

The Project area is one of the areas declared<sup>2</sup> as a YEKA within the scope of the Renewable Energy Resource Areas (YEKA) Regulation<sup>3</sup>. The Project Company has secured the preliminary license dated 6 April 2023, and valid for eight months and seventeen days. Pre-license refers to the permission granted to the Project Company for a certain period of time (i.e., 21 months) to obtain required approvals, permits, and licenses to commence investments in energy generation activities. Within the pre-license period the Project Company is obliged to fulfil the requirements listed in Article 17 of Electricity Market License Regulation. These include, among others, securing the land ownership right or land tenure, securing the zoning plan approvals, applying the relevant electricity distribution company for connection approvals, and securing National EIA approval. The construction period of the Project will be 21 months and the operation period will be 49 years as stated in the National Environmental Impact Assessment (EIA) Report. The construction of the Project has been initiated in the first quarter of 2024 with the construction of Project roads and is planned to be completed by the fourth quarter of 2025.

The Project will consist of 60 wind turbines with unit power of 4.2 MW<sub>m</sub>/4.167 MW<sub>e</sub> together with two switchyards, an administrative building, a total of 65,000 m Project roads which are planned to be constructed, as well as two energy transmission lines (ETL); one 400 kV single-circuit transmission line with a length of 123 km to enable the connection between 400 kV Uygar WPP Transformer Substation (TS) and 400/154 kV Bayramiç Havza TS which is currently operated by TEIAS, and one 400 kV single-circuit transmission line with a length of 13.1 km to enable connection between 400 kV Uygar WPP TS and 400/154 kV İzmir Havza TS as a Project associate facility blasting activities will be conducted at the specified turbine locations, and a 200 tonnes/hour capacity mobile crushing and screening facility<sup>4</sup>, will be established for sizing

<sup>&</sup>lt;sup>1</sup> Published in the Official Gazette Date/No: 07.11.2018/30588.

<sup>&</sup>lt;sup>2</sup> The declaration was published in the Official Gazette Date/No.: 21.03.2021/31430.

<sup>&</sup>lt;sup>3</sup> Published in the Official Gazette Date/No.: 09.10.2016/29852.

<sup>&</sup>lt;sup>4</sup> 200 tonnes/hour capacity mobile crashing and screening facility is included in the National Environmental Impact Assessment (EIA) Study.

the materials obtained from the blasting. The Project is designed as such the WPP will have 1,000,000,000 kWh of annual electricity generation capacity with a total installed power of 252 MW<sub>m</sub>/250 MW<sub>e</sub>.

The Project is subject to conducting a National Environmental Impact Assessment (EIA) Study in regard with the Regulation on Environmental Impact Assessment<sup>5</sup> of Türkiye. According to the Regulation, the Project is covered under Article 41 -Wind power plants- of *Annex-1: List of Projects Subject to Environmental Impact Assessment*, and Article 45-e - Facilities that perform at least one of the crushing, screening, washing, drying and ore preparation processes- of *Annex-2: Projects Subject to Pre-review and Assessment of Environmental Impact*. In this sense, a National EIA Report was prepared for the Project by an environmental consultancy company, namely Nartus. The Review and Evaluation Commission meeting for the Project took place on 18 July 2023, at the MoEUCC, where all relevant institutions expressed their positive opinions on the final amendments on the Project and commitments are provided in final draft National EIA Report. The final National EIA Report prepared by Nartus was accepted by the official announcement shared on 1 September 2023 by the MoEUCC. The EIA Positive Decision for the Project was granted on 15 November 2023.

The internal ETL component of the Project is also subject to EIA Study. The responsibility of the EIA and permitting processes fully lies with the Project Company. For the internal ETL project, a Project Description File in line with the requirements of National EIA legislation has been prepared by a local company with a competency certificate to prepare the report and submitted to the MoEUCC. The EIA process of the internal ETL project was initiated with an announcement dated 26 October 2023 through the website of the MoEUCC and it is ongoing.

The Project is subject to conducting National Environmental Impact Assessment (EIA) Study in regard with the Regulation on Environmental Impact Assessment<sup>6</sup> of Türkiye. In this sense, a National EIA Report was prepared for the Project by an environmental consultancy company, namely Nartus. The Review and Evaluation Commission meeting for the Project took place on 18 July 2023, at the MoEUCC, where all relevant institutions expressed their positive opinions on the final amendments on the Project and commitments are provided in final draft National EIA Report. The final National EIA Report prepared by Nartus was accepted by the official announcement shared on 1 September 2023 by the MoEUCC. The EIA Positive Decision for the Project was granted on 15 November 2023.

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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.

<sup>&</sup>lt;sup>5</sup> Published in the Official Gazette Date/No: 29.07.2022/31907.

<sup>&</sup>lt;sup>6</sup> Published in the Official Gazette Date/No: 29.07.2022/31907.

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 Environmental and Social Impact Assessment (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 to the organisational chart of the Project.

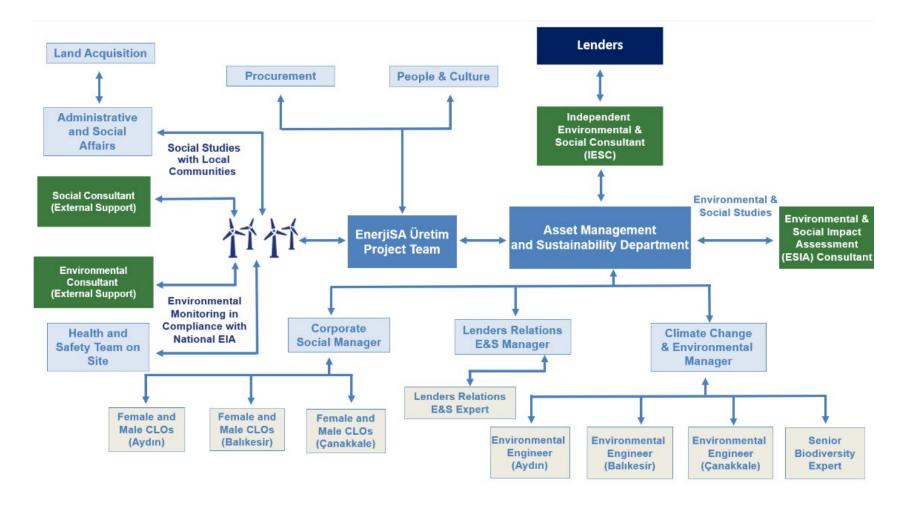


Figure 1.1: Project Organisational Chart

Source: Enerjisa Üretim

The IFIs seek compliance with internationally accepted environmental and social standards. Therefore, they require the Project Company to conduct an ESIA 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)<sup>7</sup>, 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 pre-construction, 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 the Right to Information in order to achieve an effective SEP.

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.

<sup>&</sup>lt;sup>7</sup> The Project Company requires compliance with EBRD requirements.

### 1.3 Project Location and Social Area of Influence

The social area of influence (AoI) of the Project covers a total of 16 neighbourhoods in Bergama district of İzmir province, Soma district of Manisa province, and İvrindi district of Balıkesir province. Since the route and location of the poles and ETLs are not certain, expropriation activities will become clear in later stages of the Project. Therefore, there is no information regarding ETL-based expropriation activities within the scope of this Final SEP. Further assessments will be made for both the pylon points and the line route once the land acquisition procedures on the parcels to be affected by the ETL construction are finalised. In the Resettlement Action Plan (RAP) to be prepared, a framework to ETL construction will be presented and potential entitlements will be revealed.

These are the nearest settlements to the Project area including the following neighbourhoods:

Table 1.1: Affected Districts and Neighbourhoods in the Project's Social Area of Influence (AoI)

District	Neighbourhood		
	Göçbeyli		
	İneşir		
	Durmuşlar		
	Çamoba		
Bergama	Alhatlı		
Dergama	Yalnızdam		
	Sarıcaoğlu		
	Kozluca		
	Yukarıada		
	Oruçlar		
	Kiraz		
Soma	Kaplan		
	Yayladalı		
	Duğla		
İvrindi	Haydar		
- Willia	İkizce		

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 and dwellings have the potential to be significantly and adversely affected due to land acquisition and/or expropriation of their agricultural or pasture lands.
- Nearby neighbourhoods and business enterprises located in the immediate vicinity of the Project area 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 purposes 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: Neighbouring communities located in the close proximity of the
  Project area that are likely to be exposed to noise and visual impacts,
- Residents located approximately 2 km to 4 km distant from the nearest turbines to their neighbourhoods (This group needs to be considered during the construction phase as such the residents use the lands as pasture for animal husbandry activities in the neighbourhood.
   It is likely that there will be traffic volume increase and dust generation on the main roads used to access the neighbourhood, especially during the construction phase),
- 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 1.2: 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.	1	Construction	<ul> <li>Trainings and Code of Conduct for workers</li> <li>SEP, continuous consultation, and engagement through the Community Liaison Officers (CLOs)</li> <li>Community grievance mechanism</li> <li>Community Health, Safety and Security Procedure</li> <li>Company GBVH Policy</li> <li>Transport Control and Site Access Procedure/Traffic Management Plan</li> <li>Road safety, traffic regulations and speed limit trainings for workers within and near the Project area</li> </ul>
	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> <li>Trainings and Code of Conduct for workers</li> <li>SEP, continuous consultation, and engagement through the CLOs</li> <li>Community grievance mechanism</li> <li>Community Health, Safety and Security Procedure</li> <li>Transport Control and Site Access Procedure/Traffic Management Plan</li> <li>Road safety, traffic regulations and speed limit trainings for workers within and near the Project area</li> </ul>
	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	<ul> <li>Noise Management Plan (NMP)</li> <li>SEP, continuous consultation, and engagement through the CLOs</li> <li>Community grievance mechanism</li> </ul>
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 /	Construction	Transport Control and Site Access Procedure/Traffic Management Plan

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.	Project affected neighbourhoods		<ul> <li>Awareness activities for children about road traffic safety</li> <li>Road safety, traffic regulations and speed limit trainings for workers within and near the Project area</li> <li>SEP, continuous consultation, and engagement through the CLOs</li> <li>Community grievance mechanism</li> <li>Evaluating collaborative activities as corporate social responsibility strategy</li> <li>SEP, continuous consultation, and engagement through the CLOs</li> <li>Community grievance mechanism</li> </ul>
	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. Students whose schools and/or houses are close to the turbines may be affected from the noise during the operation phase		Operation	Noise Management Plan     SEP, continuous consultation, and engagement through the CLOs     Community grievance mechanism     Operational maintenance procedures
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 may occur due to the land acquisitior process carried out within the scope of the Project.	acquired-expropriated า	e Construction	<ul> <li>SEP, continuous consultation, and engagement through the CLOs</li> <li>Community grievance mechanism</li> <li>Resettlement Action Plan</li> <li>Land Acquisition Procedure</li> </ul>
Local Economy, Livelihood Sources and Employment	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.	agriculture	Construction	<ul> <li>SEP, continuous consultation, and engagement through the CLOs</li> <li>Community grievance mechanism</li> <li>Air Quality Management Plan</li> <li>Resettlement Action Plan</li> </ul>
	The contractors and subcontractors of the Project will employ the local unskilled and semi-skilled	Local community members / Local		Local employment and procurement strategy

Impact Topic	Impact Description	Receptor	Phase of the Project	Mitigation Measures	
	workforce. This can contribute to a certain reduction in unemployment and increase in the welfare of the employed workers' families.	communities / Project affected neighbourhoods		SEP, continuous consultation, and engagement through the CLOs     Resettlement Action Plan	
	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.	Local community members / Local businesses, enterprises and suppliers	_	<ul> <li>Community grievance mechanism</li> <li>Local Content and Procurement Procedure (LCPP)</li> </ul>	
	There are pasture lands where the Project is located. Main concerns reported by the consulted local community members were about the loss of income for the households whose livelihood is based on animal husbandry. However, the turbine areas will not be fenced, which will enable the herds to be grazed.	Local community members whose livelihoods are based on animal husbandry	Operation	<ul> <li>SEP, continuous consultation, and engagement through the CLOs</li> <li>Resettlement Action Plan</li> <li>Community grievance mechanism</li> <li>Security Management Plan</li> </ul>	
Infrastructural Services	The operation of infrastructure facilities (i.e., residents' access to local community infrastructure 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.	Local community	Construction	<ul> <li>SEP, continuous consultation, and engagement through the CLOs</li> <li>Traffic Management Plan</li> <li>Community grievance mechanism</li> <li>Correspondence with governmental institutions when necessary (i.e., for water, road, transportation issues)</li> <li>Community Health, Safety and Security Procedure</li> </ul>	
Gender	The Project may improve the gender equality through local employment of both women and men residing in the Project affected neighbourhoods.  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.  The potential influx of male workers into neighbourhoods due to the Project construction	yLocal community	Construction	<ul> <li>Trainings and Code of Conduct for workers</li> <li>Awareness raising activities for the Project affected neighbourhoods</li> <li>Specific meetings with women in the Project affected neighbourhoods</li> <li>SEP, continuous consultation, and engagement through the CLOs</li> <li>Community grievance mechanism</li> </ul>	

Impact Topic	Impact Description	Receptor	Phase of the Project	Mitigation Measures
	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.  Throughout the construction activities, genderbased violence and harassment (GBVH) cases may occur unless preventive measures are taken.	e		<ul> <li>Community Health, Safety and Security Procedure</li> <li>Company GBVH Policy</li> </ul>
Vulnerable Groups	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 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.	Local community members who are in a more disadvantaged position	Construction	<ul> <li>Trainings and Code of Conduct for workers</li> <li>SEP, continuous consultation, and engagement through the CLOs</li> <li>Community grievance mechanism</li> <li>Community Health, Safety and Security Procedure</li> </ul>

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 Resettlement Action Plan (RAP) has been prepared.

Permitting process for the internal ETL is being managed by Project Company; and the responsibility of the National EIA study also lies with the Project Company. However, since the route and location of the poles and ETLs are not certain, expropriation activities will become clear in later stages of the Project. Therefore, there is no information regarding ETL-based expropriation activities within the scope of this Final SEP. Further assessments will be made for both the pylon points and the line route once the land acquisition procedures on the parcels to be affected by the ETL construction are finalised. In the RAP to be prepared, a framework to ETL construction will be presented and potential entitlements will be revealed.

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 ice and 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, 16 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 two structures and few neighbourhoods within the average and no 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 and vicinity of the structures within the average throw distance. Considering the low probability and expected small throw distance, the impact regarding the blade throw is considered to be negligible for the average distance and maximum distance,

which makes the overall impact magnitude minor for both distances. Hence, no physical displacement is in question as no significant blade throw risk is in place.

Ice throwing distances are calculated with supplied design parameters and found out to be 374 m. ESIA ice throw assessment studies of the Project show that there are 16 structures in 178 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 preconstruction, 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) to 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 April 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)

vulnerable groups.

- 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
- 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 website<sup>8</sup>:

### **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:**

- Resettlement Action Plan
- · 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.

221100030 | SEP | Rev E | September 2024

<sup>8 &</sup>lt;u>https://www.enerjisauretim.com.tr/</u>

### 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
National	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
	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, General Directorate of Food and Control	_	
	MoAF, General Directorate of		
	Livestock	MoAF may have specific views about the	
	MoAF, General Directorate of	design, construction, and operation activities	Medium
	Fisheries and Aquaculture	of the Project.	
	MoAF, General Directorate of Nature		
	Conservation and National Parks	<u> </u>	
	MoAF, General Directorate of State		
	Hydraulic Works		

### **GOVERNMENTAL BODIES**

Level	Organization	Relation to the Project	Level of Interest
	MoAF, General Directorate of Water		
	Management Ministry of Environment, Urbanization and		
	Climate Change (MoEUCC)		
	MoEUCC, General Directorate of EIA,		
	Permit and Audit		
	MoEUCC, General Directorate of		
	Environmental Management	MoEUCC has regulatory functions in relation	
	MoEUCC, General Directorate of	to the Project such as environmental impact	Medium
	Infrastructure and Urban	assessment permits and environmental	
	Transformation	permitting.	
	MoEUCC, General Directorate of	•	
	Spatial Planning		
	MoEUCC, General Directorate of		
	Protection of Natural Assets		
	Ministry of Transport and Infrastructure (MoTI)		
	MoTI General Directorate of	MoTI may have specific views regarding	Medium
	Infrastructure Investments	evaluation of the Project.	meatam
	MoTI General Directorate of Highways		
	Ministry of Labour and Social Security (MoLSS)	MoLSS may have specific views on labour	
	MoLSS, General Directorate of Labor	and working conditions, and health and safety	Low
	MoLSS, General Directorate of	of the Project personnel.	
	Occupational Health and Safety		
	Ministry of Culture and Tourism (MoCT)	· M OT	
	MoCT General Directorate of Cultural	MoCT may have views in terms of legislation.	Low
	Heritage and Museums		
	2 <sup>nd</sup> Regional Directorate of DSI (State Hydraulic	This organization may have specific views	
	Works)	about water courses running close to the	Low
	25 <sup>th</sup> Regional Directorate of DSI (State Hydraulic	Project area.	
	Works)  4 <sup>th</sup> Regional Directorate of Ministry of Agriculture		
	and Forestry	This organization may have specific views on	
	2 <sup>nd</sup> Regional Directorate of Ministry of Agriculture	the potential protected areas close to the Project area and the status of the trees in the	High
	and Forestry	Project area.	
Regional	2 <sup>nd</sup> Regional Directorate of General Directorate of	•	
	Highways	The organization may provide opinion	
	14 <sup>th</sup> Regional Directorate of General Directorate	regarding road crossing within the Project	High
	of Highways	area.	
	Izmir Regional Council for the Conservation of	Those organizations are important	
	Cultural Property 2	These organizations are important stakeholders to identify and clarify the	High
	Balikesir Regional Council for the Conservation	archaeological potential of the Project area.	- Filgii
	of Cultural Property		
	The Governorship of Paliticain	The governorships representing the national	100.0
	The Governorship of Balikesir	government are the highest authorities in the	High
	The Governorship of Manisa	provinces.	
	İzmir Investment and Coordination Committee		
	Directorate	These organizations coordinate all kinds of	
	Balıkesir Provincial Directorate of Planning and	investment and construction works to be	High
	Coordination	carried out by ministries and other central	
	Manisa Investment and Coordination Committee	government organizations in the provinces.	
Provincial	Directorate		
	İzmir Metropolitan Municipality		
	İzmir Metropolitan Municipality,		
	Directorate of Environmental Protection	The metropolitan municipality and its relevant	
	and Control	departments will have responsibilities in	High
	İzmir Metropolitan Municipality,	relation to the Project.	911
	Directorate of Zoning and City Planning		
	İzmir Metropolitan Municipality,		
	Directorate of Transportation		Lliada
	Balıkesir Metropolitan Municipality		High

### **GOVERNMENTAL BODIES**

_evel	Organization	Relation to the Project	Level of Interest
	Balıkesir Metropolitan Municipality,		
	Directorate of Environmental Protection		
	and Control	The metropolitan municipality and its relevant	
	Balıkesir Metropolitan Municipality,	departments will have responsibilities in	
	Directorate of Zoning and City Planning	relation to the Project.	
	Balıkesir Metropolitan Municipality,	•	
	Directorate of Transportation		
	Manisa Metropolitan Municipality		
	Manisa Metropolitan Municipality,		
	Directorate of Environmental Protection		
	and Control	The metropolitan municipality and its relevant	
	Manisa Metropolitan Municipality,	departments will have responsibilities in	High
	Directorate of Zoning and City Planning	relation to the Project.	
	Manisa Metropolitan Municipality,		
	Directorate of Transportation		
	İzmir Governorship Provincial Directorate of		
	Social Security Institution	These organizations may provide specific	
	Balıkesir Governorship Provincial Directorate of	views on labour and working conditions, and	Low
	Social Security Institution	health and safety of facility personnel.	
	Manisa Governorship Provincial Directorate of	, , , ,	
	Social Security Institution		
	İzmir Governorship Provincial Directorate of		
	Environment, Urbanization and Climate Change		
	(PDoEUCC)		
	Balıkesir Governorship Provincial Directorate of	PDoEUCCs of the provinces have regulatory	
	Environment, Urbanization and Climate Change	functions related to the Project such as	High
	(PDoEUCC)	environmental impact assessment permits	9
	Manisa Governorship Provincial Directorate of	and environmental permitting.	
	Environment, Urbanization and Climate Change		
	(PDoEUCC)		
	İzmir Provincial Directorate of Environment and		
	Urbanization	<del>-</del>	
	Balıkesir Provincial Directorate of Environment	These organizations have regulatory functions	High
	and Urbanization	in relation to the Project such as environmental impact assessment permits	
	Manisa Provincial Directorate of Environment and	and environmental permitting.	
	Urbanization	and onvironmental permitting.	
	Izmir Regional Council for the Conservation of		
	Cultural Property 2		
	Balıkesir Regional Council for the Conservation	These organizations are important	
	of Cultural Property	stakeholders to identify and clarify the	High
	İzmir Bergama Museum Directorate	archaeological potential of the Project area.	
	Manisa Archaeology Museum Directorate		
	Balıkesir Kuvayi Milliye Museum Directorate		
	İzmir Provincial Directorate of Agriculture and		
	Forestry	Those examinations required to accorde to	
	Balıkesir Provincial Directorate of Agriculture and	These organizations may provide provincial-	Llink
	Forestry	specific and/or site-specific views on the Project.	High
	Manisa Provincial Directorate of Agriculture and		
	Forestry		
	İzmir Provincial Command of Gendarmerie	These organizations may provide provincial-	
	Balıkesir Provincial Command of Gendarmerie	specific and/or site-specific views on the	Medium
	Manisa Provincial Command of Gendarmerie	Project.	
	İzmir Water and Sewer Administration (İZSU)	•	
		These organizations may provide an opinion	Medium
	Balıkesir General Directorate of Water and	related to water/wastewater infrastructure of	
	Sewerage Administration (BASKI)	the Project area.	
	Manisa Water and Sewer Administration (MASKI)		
	The Local Governorship of Bergama	The Project area is located in Bergama, İvrindi and Soma districts and the local governorship, the central municipality and their related departments are stakeholders regarding obtaining relevant permits, approvals during	
	The Municipality of Bergama		High
	Directorate of Zoning and Urbanisation		
	Directorate of Civil Works		

### **GOVERNMENTAL BODIES**

Level	Organization	Relation to the Project	Level of Interest
	Directorate of Cleaning Works	planning, and construction and operation	
	Directorate of Municipal Police	phases of the Project.	
	Bergama District Directorate of Health	_	Medium
	Bergama District Gendarmerie Command	_	Medium
	The Local Governorship of İvrindi		
	The Municipality of İvrindi		
	Directorate of Zoning and Urbanisation		
	Directorate of Civil Works	-	High
	Directorate of Plan and Project	-	
	Directorate of Cleaning Works	-	
	Directorate of Municipal Police	-	
	İvrindi District Directorate of Health	-	Medium
	İvrindi District Gendarmerie Command	-	Medium
	İvrindi District Directorate of Agriculture and	-	100.00
	Forestry		High
	The Local Governorship of Soma		
	The Municipality of Soma	-	
	Directorate of Zoning and Urbanisation		
	Directorate of Civil Works		High
	Directorate of Plan and Project	-	3
	Directorate of Cleaning Works	-	
	Directorate of Municipal Police		
	Soma District Directorate of Health	-	Medium
	Soma District Gendarmerie Command	-	Medium
	Soma District Directorate of Agriculture and	-	High
	Forestry		High

Table 3.2: External Stakeholder List for Non-Governmental Bodies

### **NON-GOVERNMENTAL BODIES**

### **NON-GOVERNMENTAL BODIES**

Level	Organization	Relation to the Project	Level of Interest
	Bergama Cattle Breeders Association		
	Soma Chamber of Agriculture		
	Soma Chamber of Commerce		
	Soma Chamber of Merchants and Craftsmen		
	Soma Women's Solidarity Association Soma Culture and Solidarity Association		
	Soma Social Rights Association		
	Soma Charity Association		
	Soma Employees Association		
	İvrindi Association for the Protection and Sustenance of Living and Agricultural Areas		
	İvrindi Chamber of Agriculture		
	İvrindi Chamber of Commerce		
	Ivrindi Chamber of Merchants and Craftsmen		
	Ivrindi Tradesmen and Craftsmen Credit Guarantee Cooperative		
	Gökçeyazı Agricultural Credit Cooperative		
	Çekov Environmental Protection Magazine		
	Manisa Association for the Protection of Biological Diversity in Nature and Rural Development		
	İzmir Environmental Platform		
	Manisa Environmental Platform		
	Balıkesir Environmental Platform		
	Ege Environmental Platform		
	Balıkesir Nature Protection Association		
	Balıkesir Renewable Energy Resources Association		

**Table 3.3: Other External Stakeholder Groups** 

### **STAKEHOLDER GROUPS**

Mukhtars/Residents/Local Eccal Businesses and Enterprises (Local shops, beekeepers, income-generating agricultural lands)  Mukhtars/Residents/Local Communities  Mukhtars/Residents/Local Structure owners whose structures are within the turbine setback area of the Project One informal user of one of the Project One informal user of one of the Project offected public lands identified within the scope of the RAP studies Local communities including PAPs subject to direct land acquisition  Women  The landless/homeless people The elderly Students Unemployed people Local, regional, and social media (including but not limited to the following newspapers, TV stations, social media channels):  Media  **Ege News** Son Mühür Newspaper**  **It is important to engage with local and regional media organizations for effective public disclosure and consultation.  Media  **Modium Consultation**  **Medi	Level	Group	Relation to the Project	Level of Interest
Unincrable / Disadvantaged Groups  Women  The landless/homeless people The elderly Students Unemployed people Local, regional, and social media (including but not limited to the following newspapers, TV stations, social media channels):  ### Ege News Son Mühür Newspaper  Aydın Voice Newspaper  Aydın Voice Newspaper  ### Apdin Voice Newspaper  Apdin Voice Newspaper  ### Apdin Voice Newspaper  ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper  ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   ### Apdin Voice Newspaper   #### Apdin Voice Newspaper  ### Apdin Voice Newspaper   #### Apdin Voice Newspaper   #### Apdin Voice Newspaper  #### Apdin Voice Newspaper  #### Apdin Voice Newspaper  ##### Apdin Voice Newspaper  ##### Apdin Voice Newspaper  ##### Apdin Voice Newspaper  ##### Apdin Voice Newspaper  ###### Apdin Voice Newspaper  ########## Apdin Voice Newspaper  ####################################		affected neighbourhoods  Local Businesses and Enterprises (Local shops, beekeepers, income-generating agricultural lands)  Structure owners whose structures are within the turbine setback area of the Project	<ul> <li>Neighbourhoods are key stakeholders considering potential</li> </ul>	
Wulnerable/ Disadvantaged Groups  The landless/homeless people The elderly Students Unemployed people Local, regional, and social media (including but not limited to the following newspapers, TV stations, social media channels):  Pege News Son Mühür Newspaper It is important to engage with local and regional media organizations for effective public disclosure and consultation.  Media  Women The landless/homeless people Vulnerable groups are key stakeholders considering potential impacts of the Project.  High It is important to engage with local and regional media organizations for effective public disclosure and consultation.		affected public lands identified within the scope of the RAP studies  Local communities including PAPs subject to		
The elderly  Students  Unemployed people Local, regional, and social media (including but not limited to the following newspapers, TV stations, social media channels):  It is important to engage with local and regional media organizations for effective public disclosure and consultation.  Media  The elderly  Stakeholders considering potential impacts of the Project.  High  High  High  High  High  Media  Algebra Stakeholders considering potential impacts of the Project.  It is important to engage with local and regional media organizations for effective public disclosure and consultation.		<u> </u>	stakeholders considering potential	
The elderly  Students  Unemployed people Local, regional, and social media (including but not limited to the following newspapers, TV stations, social media channels):  It is important to engage with local and regional media organizations for effective public disclosure and consultation.  Media  The elderly  Stakeholders considering potential impacts of the Project.  High  Hi	Vulnarable/ Diagdyantared	The landless/homeless people		High
Students  Unemployed people  Local, regional, and social media (including but not limited to the following newspapers, TV stations, social media channels):  It is important to engage with local and regional media organizations for effective public disclosure and consultation.  Media  Media  It is important to engage with local and regional media organizations for effective public disclosure and consultation.	•	The elderly		
Local, regional, and social media (including but not limited to the following newspapers, TV stations, social media channels):  It is important to engage with local and regional media organizations for effective public disclosure and consultation.  Media  Local, regional, and social media (including but not limited to the following newspapers, TV stations, social media channels):  It is important to engage with local and regional media organizations for effective public disclosure and consultation.		Students		
but not limited to the following newspapers, TV stations, social media channels):  It is important to engage with local and regional media organizations for effective public disclosure and consultation.  Medium  Medium  Aydın Voice Newspaper			-	
<ul> <li>Ege News and regional media organizations</li> <li>Son Mühür Newspaper for effective public disclosure and consultation.</li> <li>İzmir Newspaper</li> <li>Aydın Voice Newspaper</li> </ul>		but not limited to the following newspapers,		
Son Mühür Newspaper for effective public disclosure and consultation.  Medium  for effective public disclosure and consultation.		Ege News		
Izmir Newspaper     Aydın Voice Newspaper	Media	•	for effective public disclosure and	Medium
Aydın Voice Newspaper		' '		
Aydın Denge Newspaper				
		Aydın Denge Newspaper		

### **STAKEHOLDER GROUPS**

Level	Group	Relation to the Project	Level of Interest
	Aydın Newspaper		
	HaberTire News		
	Aydın Kulis Newspaper		
	, , , ,		
	<ul> <li>Manşet Aydın Newspaper</li> </ul>		
	<ul> <li>Balıkesir Newspaper</li> </ul>		
	Postam Newspaper		
	Balıkesir Merhaba Newspaper		
	İz Newspaper		
	Bergama Agenda News		
	Ege TV		
	Balıkesir TV		
	Aydın TV		
	Channel İzmir TV		
	İzmir Ege University	Universities are one of the key	
	İzmir Dokuz Eylül University	stakeholders when research needs	
Universities	İzmir Ekonomi University	<ul> <li>stakeholders when research needs</li> <li>to be conducted within the scope</li> <li>of the Project.</li> </ul>	Medium
	Manisa Celal Bayar University		
	Balıkesir University		
	İvrindi State Hospital		
	Edremit State Hospital		
	Havran State Hospital		
	Soma State Hospital		
	Kınık State Hospital		
	İvrindi Firestation		
	Soma Fire Brigade		
	Bergama Firestation		
	Ege University Bergama Vocational High	It is essential to ensure that the	
	School	social environments that pose a	
Other potentially affected	Taşdibi Primary School	significant place for community	
local social institutes	Oruclar Primary School	health, safety and security issues	
	Karalar Primary School	(i.e., hospitals, fire stations) and/or	Medium
	Kiranlı Primary School	where key stakeholders utilize/	
	Büyükyenice Primary School	spend their time are operating properly at every stage of the Project.	
	Göçbeyli Primary School		
	Karacam Primary School		
	Ularca Primary School		
	Yukarıada Primary School		
	Söğütçük Primary School		
	Cukurlar 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
	Project staff		
Internal Stakeholders	Contractors and subcontractors and their employees	These groups are one of the key stakeholders in terms of continuation of the Project activities in compliance with the international standards.	High
	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 Environmental Impact Assessment, Permit and Inspection
  - General Directorate of the Protection of Natural Assets
  - General Directorate of Meteorology, Presidency of Observation Systems Department
- Ministry of Energy and Natural Resources,
  - General Directorate of Energy Affairs
  - General Directorate of Mining and Petroleum Affairs, Department of Special Areas and Mapping
- Ministry of Agriculture and Forestry,
  - General Directorate of Forestry
  - General Directorate of State Hydraulic Works (DSI), Department of Surveys, Planning, and Allocations
- Ministry of Transport and Infrastructure,
  - Airports Department Directorate, General Directorate of Civil Aviation
  - General Directorate of Highways
- General Directorate of State Airports Administration, Electronic Department Presidency
- General Directorate of Highways 2<sup>nd</sup> and 14<sup>th</sup> Regional Directorate
- Energy Market Regulatory Authority
- İzmir Provincial Directorate, Presidency of Culture and Tourism, Investments Department
- İzmir Provincial Directorate of Investment Monitoring and Coordination
- Manisa Provincial Directorate of Investment Monitoring and Coordination
- İzmir Provincial Disaster and Emergency Management Directorate
- Balıkesir Provincial Disaster and Emergency Management Directorate
- Manisa Provincial Disaster and Emergency Management Directorate

- Burhaniye District Municipality, Directorate of Sanitation
- Bergama District Municipality, Directorate of Sanitation

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

- General Directorate of Highways, 2<sup>nd</sup> Regional Directorate is concerned about the Project's proximity to the 35-05 KKN / 45-76 KKN (Bergama-Soma) Ayr. Turanlı 14<sup>th</sup> Region Border Road. They emphasize that no activities should be conducted within a 60-meter distance from the existing road. Compliance with specified minimum distances is required for near roads of the Project area within the Authority's responsibility area.
- Ministry of Environment, Urbanization, and Climate Change, General Directorate of Environmental Impact Assessment, Permit, and Inspection has concerns related to the Project's revised capacity and its impact on the environment. They emphasize the need for technical and scientific justifications for alternative project areas and address potential environmental impacts. The Project area overlapped with 12 exploration and operation permit areas, including those related to mining activities. It is noted that the mining activities in these permit areas will not be obstructed.
- Ministry of Transport, Maritime Affairs, and Communications, General Directorate of Highway
  is concerned about road safety distances for WPPs. They outline specific calculations for
  minimum safety distances from roads and emphasize the importance of adhering to these
  distances to ensure safety.
- Ministry of Environment, Urbanization, and Climate Change, General Directorate of the Protection of Natural Assets notes that the Project area falls within a potential natural site area and highlights the need for consultation after completing the natural site registration process.
- Ministry of Agriculture and Forestry, General Directorate of State Hydraulic Works (DSI) has
  concerns related to the Project's impact on water sources and riverbeds. They emphasize
  the importance of preserving structures and maintaining minimum distances between the
  turbines and riverbeds.
- Ministry of Agriculture and Forestry, General Directorate of Forestry outlines several commitments that should be included in the National EIA report, such as ensuring that the Project does not interfere with fire towers and committing to fire safety measures.

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 institutions 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 public participation meetings were carried out in İzmir, Balıkesir and Manisa provinces within the scope of the National EIA Studies. Public participation meetings were conducted on 13 April 2022 in Manisa and Balıkesir, and on 14 April 2022 in İzmir. These meetings aimed to engage with the public, provide information about the Project, and gather their feedback regarding the Project.

The Project Company appointed a social consultancy company named Adam Smith, whose consultants have been in the field and consulting the residents in the nearby neighbourhoods for approximately two years as of October 2023. The social consultants have regularly visited the mukhtars and residents of the neighbourhoods that are in close proximity to the Project area.

The consultants collected information about the history, residential conditions, natural structure, 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 land acquisition and expropriation. The main concerns raised by stakeholders during this process were whether the Project would have any negative impacts on the basic livelihoods of the residents (in terms of land acquisition, expropriation, construction process, environmental impacts, etc.). 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. However, the outcomes of the consultations with these stakeholders were not registered in a written way and detailed information cannot be retrospectively retrieved from Adam Smith.

The Consultant carried out a field visit in October 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 RAP 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 cantered 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 two site visits on 31 October 2023 and 7-8 December 2023 within the scope of the ESIA study of the Project. Six out of 16 Project-affected neighbourhoods were visited by the Consultant as a part of the site visits conducted in October and December 2023. 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 visits 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 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) due to time constraints and logistical challenges remained as a limitation of the consultation study. The external stakeholders interviewed during the field studies are listed below:

- Mukhtar and residents of Çamoba neighbourhood (İzmir)
- Member of the mukhtar office (Aza) and residents of Alhatlı neighbourhood (İzmir)
- Bergama District Directorate of Agriculture and Forestry (İzmir)
- Mukhtar and residents of Durmuşlar neighbourhood (İzmir)
- Mukhtar and residents of Kiraz neighbourhood (Manisa)
- Mukhtar and residents of Haydar neighbourhood (Balıkesir)
- Mukhtar and residents of İkizce neighbourhood (Balıkesir)
- İvrindi District Directorate of Agriculture and Forestry (Balıkesir)

The main findings of these consultations are summarized below:

- Majority of the consulted residents (particularly in Çamoba, Alhatlı and Haydar neighbourhoods) were aware of the Project's land acquisition activities and mentioned that the land acquisition negotiations were handled well by the Project Company. However, the landowners in Durmuşlar and Kiraz neighbourhoods did not have detailed information on the land acquisition processes although they are aware of the Project for a long time. It was observed in Durmuşlar neighbourhood that some of the landowners reacted to the decision of the urgent expropriation and stated that they will object to the decision. They added that the remaining land will be useless after the expropriation processes are completed due to partial expropriation.
- During the site visit, it was not possible to reach out any directly affected PAPs. But this limitation is filled with the studies carried out within the scope of RAP site visits. In addition to this, the stakeholders consulted in general had limited knowledge on the applicability of international standards with relation to land acquisition.
- Consulted residents of Çamoba, Haydar and İkizce neighbourhoods had some concerns
  about the Project's potential adverse impacts, which were mainly related to loss of livelihood
  (due to land expropriation and limited public access to the Project area where the pasture
  lands are located), interruptions in the access to natural spring water, road traffic safety
  issues, noise, dust, and compensation. They were also curious about the widening possibility
  of the switchyard since it may require further land acquisition and expropriation activities.
- As reported by the mukhtar of Çamoba neighbourhood, the social consultants and/or the
  Project Company representatives have been regularly visiting the neighbourhoods, informing
  the residents, and asking them if they have any requests or concerns. Accordingly, some
  residents requested support for the improvements on the access roads to the highlands and
  pasture lands. However, the mukhtar stated that since these requests have not been fulfilled
  yet, residents started complaining about the Project and losing the belief on the positive
  impacts of the Project.
- District Director of Agriculture and Forestry in Bergama underlined the certain conflicts and negative reactions against the Project that may occur among neighbourhoods due to sharing the pasture lands after expropriation works are completed. She added that there might be some provocative groups in the Project affected neighbourhoods opposing the Project.

- District Director of Agriculture and Forestry in İvrindi mentioned that the road improvements
  would be necessary during the construction phase since the current access roads to the
  Project area are not in good conditions. He also mentioned the possibility of temporary traffic
  jam.
- The following development areas were suggested and/or expected by the consulted stakeholders:
  - Providing feed support and carrying out pasture improvement works for the households whose livelihoods are based on animal husbandry
  - Providing seed and fertilizer support for the households whose livelihoods are based on agriculture
  - Organizing awareness raising activities and trainings for the olive producers
  - Establishing socioeconomic development projects for women empowerment
  - Supporting the women's enterprise cooperative established in İvrindi district and other cooperatives that are in operation in the Project affected areas
  - Providing support to the ongoing projects that are developed by İvrindi District Directorate
    of Agriculture and Forestry (i.e., increasing mushroom sales through the establishment of
    tents for processing the mushroom and establishing marketing areas for selling,
    diversification of production lines for tomato paste, pickle, tarhana, and noodle, which are
    among the traditional foods produced mostly by women)
  - Providing support for the beekeepers through trainings, activities, and hive supply
  - Providing support for the greenhouse installations
  - Creating local employment opportunities for the youth and unemployed in the nearby neighbourhoods
  - Establishing projects to diversify the different sources of income other than animal husbandry and agriculture Improving the road quality throughout the access routes between the district centres and the Project affected neighbourhoods
  - Strengthening the infrastructural conditions of the Project affected neighbourhoods (i.e., road improvements, measures to prevent flood risks, and easier access to water)
  - Enhancing the public transportation services in the Project affected neighbourhoods
  - Providing support to construct or improve the school, health facility, mosque, and social facility for weddings and funerals in the nearby neighbourhoods

Following the site visits of the Consultant, it was reported that physical displacement may occur due to the land acquisition activities being carried out within the scope of the Project. There is one dwelling which is used by the household members permanently. Details and mitigation measures are provided in RAP study of the Project.

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)<sup>9</sup>, 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

<sup>&</sup>lt;sup>9</sup> 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.

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.

Two public participation meetings for Uygar WPP were held on 2 August 2024 at Taşdibi Local Coffeehouse and Göçbeyli Wedding Hall. 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 10,11 involved the following processes:

Newspaper announcement

- •19 and 30 July 2024 in Bakırçay Postası
- •19 and 26 July 2024 in Bizim İvrindi
- Announcement for Public Participation Meeting in national newspapers

Sending invitations

- •Throughout July 2024
- Sending official invitation letters to the governmental stakeholders
- Sending invitation e-mails to and having phone calls with the other stakeholders

Public participation meeting

- •02 August 2024 between10:00am 12:00 pm at Tasdibi Local Coffeehouse
- •02 August 2024 between03:00pm 05:00 pm at Göçbeyli Wedding Hall
- Opening session
- Presentation of the Final Draft ESIA Report
- Questions & Answers session

The public participation meetings carried out at Taşdibi Local Coffehouse in İvrindi district and Göçbeyli Wedding Hall in Bergama district were 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 35 stakeholders in İvrindi district and 45 stakeholders in Bergama district along with consultants from Mott MacDonald

<sup>10</sup> Announcements for Public Participation Meeting in local newspapers are provided in Appendix 9.7.

<sup>11</sup> Announcement for Public Participation Meeting in national newspapers: <u>ENERJİSA ENERJİ ÜRETİM A.Ş.</u> (haberturk.com)

and representatives from the Project Company participated in the meetings. The meetings 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.

There were some negative opinions about the Project raised by some of the stakeholders. These were mainly related to the division of land during the expropriation process and the dust problem on the road route caused by construction activities 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 Q&A Session and answers provided by the Project Company were the following:

### Public participation meeting held at Taşdibi Local Coffehouse:

- Q1: How many years will the Project last?
  - Response: It was clarified that the Project is aimed to be completed by the end of 2025.
- Q2: Will the operation continue in bad weather conditions in winter?
  - Response: It was explained by the representatives of the Project Company that if the
    winter is intense, the operation will be suspended for a short time. Work will continue
    according to weather conditions.
- Q3: Will there be security cameras? We request cameras along the project road. It poses a risk for theft.
  - Response: The request/grievance mechanism has been explained to the stakeholder.
- Q4: There is a risk that the fountains on the road route will deteriorate. What do you suggest about this?
  - Response: It was stated that a reconnaissance will be carried out with the mukhtar of Tasdibi.
- Q5: There is too much dust on the road route.
  - Response: It was stated that a new water truck was purchased for watering of the roads.
     It was also added that the Project Company is investigating new water resources to provide watering service more frequent.
- Q6: We have requests for fences because the shape of our lands has changed.
  - Response: The request/grievance mechanism has been explained to the stakeholders.
- Q7: Will there be local employment opportunities within the scope of the Project?
  - Response: It was conveyed that there are many employment opportunities in the
    neighbourhoods, and those who would like to be employed can submit a list through the
    mukhtar. Employees will be recruited from these lists in case of recruitment needed.

### Public participation meeting held at Göçbeyli Wedding Hall:

- Q1: I cannot utilise the divided lands efficiently, what should I do about them? Some trees such as pistachio pines were not calculated in the process of expropriation, will they be compensated?
  - Response: Expropriation processes have been explained to the stakeholder. It was
    conveyed that these issues should be discussed in the reconciliation negotiations.
- Q2: Vehicles pass very fast and there is a lot of dust on the road route.
  - Response: It was stated that a new water truck was purchased for watering of the road.
     It was also added that the Project Company is investigating new water resources to

provide watering service more frequently. Vehicles are constantly being warned not to speed through the road. It was indicated when a stakeholder sees a high-speed vehicle, s/he can report the licence plates to the CLO team.

- Q3: Consent letters were not given to everyone in the neighbourhoods, and this caused grievances.
  - Response: It was explained that the consent letters are a protocol to be allowed to enter
    the land before the urgent expropriation decision. Everyone who gave this permission
    was paid. After the urgent expropriation decision was made, this process was no longer
    necessary.
- Q4: We have requests for fences because the shape of our lands has changed.
  - Response: The request/grievance mechanism has been explained to the stakeholders.

### Q5: We request that the deteriorated roads to be asphalted.

Response: It was stated that immediate action is taken when the roads deteriorate. At
the end of the construction phase of the Project, cold asphalt application will be carried
out due to the protocol.

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, 37 requests have been registered in the request/grievance log. These requests focus mainly on the support for local people, local employment opportunities, improvement of the neighbourhood roads, and land access restriction. 16 of the 37 requests are closed, and necessary actions are being taken by the CLOs to resolve the remaining 21 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,
- Creating a timetable to ensure that the stakeholders can follow the expropriation process,
- Ensuring that employees comply with the Traffic Management Plan and Air Quality Management Plan within the scope of the construction activities of the Project.

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 pre-construction, 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 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 Officers (CLOs)

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	
Loca	I Communities					
	Residents in the 16 Project Affected Neighbourhoods		<ul> <li>Face-to-face consultation meetings / participatory &amp; dialogue based approach.</li> <li>Regular visits with the local communities and residents</li> <li>Regular visits with the</li> </ul>			
	Local communities including PAPs subject to direct land acquisition	<ul> <li>Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project, provisions</li> </ul>	physically displaced PAPs to provide their needs and demands arising from relocation  Conduct regular monitoring of			
1	One informal user of one of the Project affected public lands identified within the scope of the RAP studies	to prevent the risks of GBVH  Outline the mitigation measures identified in the ESIA report and ESMP  Inform about the local employment and	compensation payments of the PAPs directly affected by the land acquisition  Disclosure of ESIA report together with its NTS (which	<ul> <li>At least monthly (and when needed) during construction</li> <li>Quarterly during operation</li> </ul>	<ul><li>CLOs</li><li>Project Company</li></ul>	
	Structure owners whose structures are within the turbine setback area of the Project	<ul> <li>procurement</li> <li>Inform about the Resettlement Action Plan and compensation procedure</li> <li>Inform about the Project activities involving community health and safety risks (blasting.</li> </ul>	also covers the summaries of CCRA and HRIA), SEP, PID/brochure and other Project related documents including RF, CHA	<ul> <li>3 days prior to risky construction activity</li> </ul>		
	Local Businesses and	transportation of heavy equipment, etc.)	eavy equipment, etc.)  • Disclosure of the Project- specific RAP to the PAPs directly affected by the Project			
	Enterprises (Local shops, beekeepers,		<ul> <li>Website announcements</li> <li>Social media announcements</li> </ul>			
	income-generating agricultural lands)		Announcements through posters/ billboards/ press release			
2	Mukhtars of the 16 Project Affected Neighbourhoods	Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and	<ul> <li>Face-to-face consultation meetings</li> <li>Regular visits</li> </ul>	<ul> <li>At least monthly (and when needed) during construction</li> </ul>	CLOs     Project Company	

No	Stakeholders	Issues to be consulted/discussed	Communication methods Phase and frequency Responsible
		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> <li>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</li> <li>Disclosure of the Project-specific RAP to the PAPs directly affected by the Project</li> <li>Website announcements</li> <li>Social media announcements</li> <li>Announcements through posters/ billboards/ press release</li> </ul>
3	Vulnerable Groups (Women, the landless/homeless people, the elderly, students, people with disabilities, unemployed people)	<ul> <li>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</li> <li>Specific interest to receive their grievances (if there are any) since they may not be able to use the grievance channels</li> <li>Outline the mitigation measures identified in the ESIA report</li> <li>Inform about the local employment and procurement</li> <li>Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.)</li> </ul>	<ul> <li>Face-to-face consultation meetings</li> <li>Regular visits</li> <li>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</li> <li>Disclosure of the Project-specific RAP to the PAPs directly affected by the Project</li> <li>Website announcements</li> <li>Social media announcements</li> <li>Announcements through posters/ billboards/ press release</li> </ul>

No Stakeholders		Issues to be consulted/discussed	Communication methods Phase and frequency Responsible
			Specific meetings held with     women groups and other     particular vulnerable groups
4	Other potentially affected local social institutes (Schools, mosques, local coffeeshops)	<ul> <li>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</li> <li>Outline the mitigation measures identified in the ESIA report</li> <li>Inform about the local employment and procurement</li> <li>Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.)</li> </ul>	<ul> <li>Face-to-face consultation meetings</li> <li>Regular visits</li> <li>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</li> <li>Website announcements</li> <li>Social media announcements</li> <li>Announcements through posters/ billboards/ press release</li> <li>Specific meetings held with children (student) groups</li> </ul>
Gove	rnmental Bodies		
5	Governmental bodies and stakeholders at national level	<ul> <li>Conduct consultation on Project stages</li> <li>Provide information on potential impacts of the Project as well as on the grievance mechanism of the Project</li> </ul>	<ul> <li>Face-to-face consultation meetings</li> <li>Regular visits</li> <li>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</li> <li>Correspondence</li> <li>Annually during construction</li> <li>When needed during operation</li> <li>Project Company operation</li> </ul>

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible	
6	Governmental bodies and stakeholders at provincial and district level	<ul> <li>Conduct meetings and correspondence for Project permits, consultation on the Project stages</li> <li>Provide information on environmental and social impacts of the Project, mitigation measures defined in the ESIA report, Project grievance mechanism</li> </ul>	<ul> <li>Face-to-face consultation meetings</li> <li>Regular visits</li> <li>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</li> <li>Correspondence</li> </ul>	<ul> <li>Every six months during construction</li> <li>Annually during operation</li> </ul>	<ul> <li>Project Company</li> </ul>	
7	District Municipalities	<ul> <li>Conduct meetings and correspondence for Project permits, consultation on the Project stages</li> <li>Provide information on environmental and social impacts of the Project, mitigation measures defined in the ESIA report, Project grievance mechanism</li> <li>Organized meetings for grievances reported to the municipal units and receiving opinions and recommendations</li> </ul>	<ul> <li>Face-to-face consultation meetings</li> <li>Regular visits</li> <li>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</li> <li>Correspondence</li> </ul>	<ul> <li>Every six months during construction</li> <li>Annually during operation</li> </ul>	<ul><li>CLOs</li><li>Project Company</li></ul>	
Unive	ersities					
8	Universities	<ul> <li>Conduct consultation on Project stages</li> <li>Organize meetings about the research needs to be conducted within the scope of the Project.</li> <li>Provide information possible impacts of the Project, information on the grievance mechanism of the Project</li> </ul>	<ul> <li>Face-to-face consultation meetings</li> <li>Regular visits</li> <li>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</li> <li>Website announcements</li> </ul>	When needed during construction and operation	<ul><li>CLOs</li><li>Project Company</li></ul>	

Issues to be consulted/discussed

Responsible

Phase and frequency

NGOs 9 NGOs	<ul> <li>Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project</li> <li>Outline the mitigation measures identified in the ESIA report</li> </ul>	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	When needed during construction and operation	CLOs     Project Company
Media				
<b>10</b> Media	<ul> <li>Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project</li> <li>Outline the mitigation measures identified in the ESIA Report</li> <li>Engage with local and regional media organizations for effective public disclosure and consultation</li> </ul>	<ul> <li>Face-to-face consultation meetings</li> <li>Regular visits</li> <li>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</li> <li>Website announcements</li> </ul>	When needed during construction and operation	<ul><li>CLOs</li><li>Project Company</li></ul>

Communication methodsCorrespondence

Stakeholders

No

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible
			<ul> <li>Social media announcements</li> <li>Announcements through posters/ billboards/ press release</li> </ul>		
Intern	nal Stakeholders				
	Project Staff		<ul> <li>Trainings</li> <li>Face-to-face consultation meetings</li> <li>Disclosure of ESIA report together with its NTS (which</li> </ul>		
11	Contractors and subcontractors and their employees	<ul> <li>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</li> <li>Disclose the grievance mechanism of the Project</li> </ul>	-l	<ul> <li>When needed during operation</li> </ul>	<ul> <li>Project Company and relevant departments (i.e., Human Resources Department)</li> </ul>

### 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 website<sup>12</sup> 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
- Posters<sup>13</sup> that are hung in common areas of the Project affected neighbourhoods, indicating what the clear communication channels are
- E-mails to the Project Company

The steps listed below summarize the external grievance mechanism process:

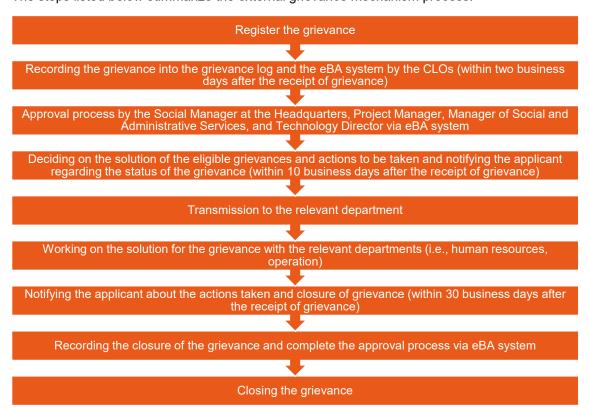


Figure 6.1: Steps of the External Grievance Mechanism Process

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.,

<sup>&</sup>lt;sup>12</sup> Project website can be accessed via <a href="https://yekares2.enerjisauretim.com">https://yekares2.enerjisauretim.com</a>. The link of the grievance form on the Project website will be included once finalized.

Poster is given in Appendices Section 9.5.

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 (including site offices, canteens and/or worker accommodation locations), 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 CLOs 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 (Uygar 1: Durmuşlar Mah, Delikıztaşı Mevkii, Bergama/İzmir & Uygar 2: Kiraz Mah, Yanıkağıl Mevkii, Soma/Manisa)
- Phone number of the Head Office: (0216) 512 40 00
- Project e-mail address: <u>yekares2@enerjisauretim.com</u>
- Project website: <a href="https://yekares2.enerjisauretim.com">https://yekares2.enerjisauretim.com</a>
- 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 CLOs 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 CLOs 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 communityrelated 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 preconstruction, 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 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 preconstruction, 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. Also, regular updates and reports regarding physical and economic displacement issues will be provided to stakeholders, including the Project Lenders to maintain transparency and accountability.

## 9 Appendices

### 9.1 The Consultation Form of the Project Company

<b>ENERJISA</b> ÜRETİM	ENERJISA ÜRETIM								
ENERSISAURETIM		11							
	İSTİŞARE KAYIT FORMU Consultation Form								
Formu Dolduran Kişi Person Filling Out the Form			Tarih						
Ü			Date  Görüşme Kay	ut No					
Toplantı Gündemi Meeting Agenda			Consultation F						
1- Toplantı Bilgileri			Number						
Meeting Information									
Yetkili Kişinin Adı				İletişim					
Name of Authorized Person istişare Edilen Kurum				Type of □ Yüz	Communication				
Institution Consulted				Face-to					
Telefon/E-posta				☐ Tele					
Phone/Email				Phone					
<b>Köy-Mahalle/İlçe/İl</b> Village/District/Province									
<b>Paydaş Tipi</b> Type of Stakeholder									
☐ <b>Kamu Kurumu</b> Public Institution	□ <b>PEK</b> PAP	□ <b>STK</b> Association/NGO	□ <b>İlgili Grup</b> Related Group	☐ Oda/Meslek Birlikleri Chamber/Professional Body					
☐ Yüklenici/Alt Yüklenici Contractor/Subcontractor	□ İşçi Sendikası Labour Union	<b>□ Medya</b> Media	□ <b>Üniversite</b> University	□ <b>Diğe</b> Other	r				
<b>2- İstişare Detayları</b> Details of the Consultation									
<b>Konu</b> Subject									
<b>Geri Bildirim</b> Feedback									
<b>Not</b> 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
							-				

### 9.3 Revised Project Grievance Register Form

A. General Inforn	nation		
Project Name			
Name of the F	Recorder		
Form Registry	<sup>,</sup> No		
Date of Regist	ter		
Place of Regis	ster	□ Project offic □ Other: Plea	ce ase specify the location
B. Means of Rece	eiving Grievance		
to this form)	ease attach one copy	□ Community	re meetings (site visits) r meetings (Public Information Meetings etc.)  □ Other: Please specify
C.1. Information a for anonymous a	about the Applicant (P	lease do not fill	C.2. Stakeholder Category
Name	pplications)		
Gender			□ Local governmental authorities
Contact	Phone number:		□ Local residents
Information	E-mail address:		□ Non-governmental organization
	L man address.		□ Project Employees
Address			□ Workers of contractors/subcontractors
Neighbourhood/			□ Consultant
District/			□ Media
Province			□ Other: Please specify
D.1. Information	about Grievance		D.2. Grievance Category
E. Actions Recor	nmandad		□ Damage to land/crop/structure □ Damage to access roads □ Environmental impacts (pollution, dust, noise) □ Use of lands without owner's consent and legal permission □ Restricting access to natural resources/lands □ Payment of usage fee or compensation □ Expropriation □ Resettlement □ Demand for job or work from local □ Working conditions □ Laying off □ Non-payments of workers' wages □ Debt to local suppliers or subcontractors □ Demanding any supports on education □ Demanding any supports for households/individuals □ Demanding any supports for local authorities □ Other: Please specify
E. Actions recoi	IIIIciiaca		

### 9.4 Project Grievance Closure Form

Name of the Recorder:									
Date of Register:									
GRIEVANCE/REQUEST CLOSURE									
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.									
(For grievances received over the Internet, an e-mail respons	T								
Actions Taken for Grievance/Request	Relevant Depa	rtments /Contractors/ Subcontractors							
1-									
2-									
3-									
4-									
Amount of Expenditure:									
Grievance/Requestor Name and Surname	On behalf of E Title-Name-Su	nerjisa Üretim rname and Signature							

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



### 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?

### 9.7 Local Newspaper Announcement for the Public Participation Meeting

### DUYURU

### ÇEVRESEL VE SOSYAL ETKİ DEĞERLENDİRMESİ SÜRECİ TOPLUMLA İSTİŞARE TOPLANTISI

Enerjisa Üretim tarafından etki alanı yerleşimleri Balıkesir ili, İvrindi ilçesi, Haydar, İkizce, Büyükyenice ve Taşdibi mahallelerinde; İzmir ili, Bergama ilçesi, Oruçlar, Ürkütler, Sarıcaoğlu, Yalnızdam, Yukarıada, İneşir, Kaplan, Alhatlı, Durmuşlar, Çamoba ve Kozluca mahallelerinde ve Manisa ili, Soma ilçesi, Duğla, Kaplan, Kiraz ve Yayladalı mahalleleri olarak belirlenen; 60 adet türbin ve 252 MW kurulu güce sahip Uygar Rüzgar Enerji Santrali Projesi'nin inşaat faaliyetleri devam etmektedir.

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, 'prójemizle ilgili bilgi aktarımı yapmak ve sizlerin değerli görüşlerini yüz yüze almak için aşağıda belirtilen tarih ve saatlerde istişare toplantıları yapılacaktır.

٢		Toplant 1	Toplant 2
	Toplantı Tarihi	02/	08/24
	Toplant Saati	10:00	15:00
	Toplanti Yeri	Taşdibi Köy Kahvesi	Göçbeyli Düğün Səlonu
	Toplantı Yeri Adresi	Taşdibi Mahallesi Taşdibi Sokak No: 106	. Göçbeyli Mahallesi Hüseyin Demir Caddesi (Belediye binası yanı)

Proje Sahibi : Enerjisa Enerji Üretim A.Ş.

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