



Hacıhıdırlar Wind Power Plant (WPP) Project

Non-Technical Summary

June 2024

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Glossary

AFAD	Disaster and Emergency Management Authority
AIS	Alien Invasive Species
AN	Ammonium Nitrate
ANFO	Ammonium Nitrate / Fuel Oil
Aol	Area of Influence
BAP	Biodiversity Action Plan
BMP	Biodiversity Management Plan
CCRA	Climate Change Risk Assessment
CCTV	Closed-circuit Television
CHA	Critical Habitat Assessment
CHIA	Cultural Heritage Impact Assessment
CHS	Community Health and Safety
CIA	Cumulative Impact Assessment
CLO	Community Liaison Officer
CoC	Code of Conduct
COD	Commercial Operation Deployment
CSR	Corporate Social Responsibility
DFC	Development Finance Corporation
DSI	State Hydraulic Works
EAAA	Ecologically Appropriate Area of Analysis
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMI	Electromagnetic Interference
EMR	Electromagnetic Radiation
Enerjisa	Enerjisa Enerji Üretim Anonim Şirketi
EMRA	Energy Market Regulatory Authority
EN	Endangered
EPA	Environmental Protection Agency
EPC	Engineering, Procurement, and Construction
EPRP	Emergency Preparedness and Response Plan
E&S	The Environmental and Social
ESIA	Environmental and Social Impact Assessment

ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESRI	Environmental Systems Research Institute
ETL	Energy Transmission Line
EU	European Union
EURO 5	The fifth iteration of emission standards set by the European Union (EU) for vehicles
GBVH	Gender-Based Violence and Harassment
GHG	Greenhouse Gas
GIIPs	Good International Industry Practices
GIS	Geographical Information System
HR	Human Resources
HRIA	Human Rights Impact Assessment
ICNIRP	International Commission on Non- Ionizing Radiation Protection
IEC	International Electrotechnical Commission
IESC	Independent Environment & Social Consultant
IFC	International Finance Corporation
ILO	International Labour Organisation
ISO	International Standardisation Organisation
KPI	Key Performance Indicator
KBAs	Key Biodiversity Areas
LRP	Livelihood Restoration Plan
MAPEG	The General Directorate of Mining and Petroleum Affairs
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NTS	Non-Technical Summary
OECD	Organisation for Economic Co-operation and Development
OHS	Occupational Health and Safety
PAA	Project Affected Area
PAHs	Project-Affected Households
PAPs	Project Affected Persons
PAS	Project Affected Settlements
PBF	Priority Biodiversity Features
PID	Project Information Document
PM	Particulate Matter
PPE	Personal Protective Equipment

PPM	Public Participation Meetings
PR	Performance Requirements
PS	Performance Standard
RAP	Resettlement Action Plan
RCAPOI	Regulation on the Control of Industrial Source Air Pollution
RENC	Regulation on Environmental Noise Control
REPA	Türkiye Energy Potential Map
RF	Resettlement Framework
SCADA	Supervisory Control and Data Acquisition
SDoD	Shut-down on Demand
SEP	Stakeholder Engagement Plan
SMP	Security Management Procedure
SSPs	Shared Socioeconomic Pathways
TEIAS	Turkish Electricity Transmission Corporation
The Consultant	Mott MacDonald Türkiye
The Project	Hacıhıdırlar Wind Power Plant (WPP) Project
TS	Transformer Substation
UNESCO	United Nations Educational, Scientific, and Cultural Organisation
VEC	Valued Environmental and Social Component
VP	Vantage Point
VU	Vulnerable
WBG	World Bank Group
WHO	World Health Organization
WPP	Wind Power Plant
YEKA	Renewable Energy Resource Area
ZVI	Zones of Visual Influence

1 Introduction

1.1 Background

This document is a Non-Technical Summary (NTS) which provides a description and the main findings of the Environmental and Social Impact Assessment (ESIA), which has been conducted to evaluate the impacts associated with the Hacıhıdırlar Wind Power Plant (“the Project”) with 15 turbines located in Aydın Province, Karacasu District, Karacaören and Ataköy Neighbourhoods; Denizli Province, Sarayköy and Babadağ District, Kiranyer, Yeşilyurt and Hisar Neighbourhoods.

The Project is part of a nine-project wind energy investment package which has a 750 MW total installed power from a total of 180 wind turbines located in western Turkey. The Project has been initiated by the Enerjisa Enerji Üretim Anonim Şirketi (“Enerjisa Üretim” or “the Project Company”) which has been awarded to utilize potential wind energy resource by constructing and operating a wind power plant (WPP) in the allocated region as a Renewable Energy Resource Area (YEKA) where the Project licence area is located. The main reason for selecting the Project site is its designation as a YEKA, as officially announced on 21 March 2021 (Official Gazette number: 31430) in accordance with the Renewable Energy Resource Areas Regulation. This designation primarily aims efficient utilization of renewable energy resources, allocating areas to investors promptly, expediting investments, and promoting the production of advanced technology components domestically or through local procurement for renewable energy facilities, contributing to technology transfer in Türkiye. YEKA can offer several advantages and positive outcomes for local communities and their members in terms of economic growth and job creation (even though it is at lower extent), improvements in local infrastructure such as roads and power grids that are beneficial for the wider community, better public health since renewable energy (with little to no greenhouse gas emissions and reduced air pollution) is produced, and energy independence, stability and security against imported price fluctuations and supply disruptions thanks to locally produced renewable energy. Additionally, renewable energy projects often involve local stakeholders in planning and decision-making, fostering a sense of ownership and empowerment within the community. In this regard, YEKA can play a crucial role in fostering sustainable, resilient, and prosperous local communities.

The construction phase of the Project is estimated to be completed in 13 months and the Power Plant will be operated for 49 years.

The Project, which will be realized using the planned financing provided by a group of development finance institutions and commercial lenders, jointly “Project Lenders” and with partial coverage by the German ECA Euler Hermes Aktiengesellschaft (“EH”), includes following components:

- Turbines (a total of 15 wind turbines)
- Switchyard and Administration Building
- Access Roads and Site Roads
- Associated Facility (the Energy Transmission Line)

It is important to mention that a case was filed by local community members on 15 June 2023, requesting annulment of the National EIA Positive decision given on 3 April 2023 for the Hacıhıdırlar WPP Project. The discovery was made by the Experts elected on 6 July 2023, and the Experts Opinion Report was prepared and submitted on 11 November 2023. The Expert Report focused on the following issues;

- Examination of the area in question in terms of agricultural production and agricultural engineering,
- Evaluation of the case subject in terms of environmental engineering and environmental legislation,
- Evaluation of the case in terms of energy engineering,
- Examination of the area in question in terms of forest engineering,
- Examination of the area in question in terms of fauna structure,
- Examination of the flora in question,
- Examination of archaeology.

After the examinations, it was stated that the National EIA Report was suitable in terms of environmental engineering, energy engineering, and archaeology, but it was not sufficient in terms of representing the fauna and ornithological structure of the Project area, flora, agricultural engineering and forest engineering. However, on 14 December 2023, Enerjisa Üretim submitted a Petition of Objection to the Expert Report to the Presidency of the Aydın 2nd Administrative Court. The Consultant received the case files from Enerjisa Üretim in January 2024.

According to the latest information shared by the Project Company with the Consultant after the annulment of the National EIA Positive decision, the Project Company has conducted additional studies and these studies will be added as additional assessments to the National EIA and the Project Company will be seeking approval for the revised National EIA.

- Ecosystem Assessment Report
- Forestry Assessment Report
- Agricultural Survey Report
- Bat Survey Report
- Research on Pollinator Insects

According to the information shared by the Project Company, a positive decision on the revised National EIA is expected to be obtained in July 2024 from MoEUCC.

1.2 Project Parties

The Project is planned to be implemented by “Enerjisa Üretim” or the “Project Company” as a leading private sector energy producer in Türkiye. The total installed capacity of the Company’s power generation portfolio is approximately 3,748 MW, of which 9.4% consists of six wind power plants with a total installed capacity of 352.8 MW. The Project Company’s goal is to complete 1,000 MW YEKA-2 project investments by early 2026 and increase their total installed capacity to 5,000 MW. They will focus on flexible and high-efficiency generation units and expanding the utilization of renewable energy resources potential in the upcoming years.

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. Furthermore, the Project Lenders have appointed Lenders’ Independent Environment & Social Consultant (IESC), namely Ramboll UK Limited (Ramboll) and ACE Consulting and Engineering Inc (ACE), for monitoring of the Project in line with the Lenders’ standards and requirements. As part of the financing process and achieving the sustainable outcomes with the Project, Mott MacDonald Türkiye (“the Consultant”) has been appointed by Enerjisa Üretim to undertake an ESIA Study. Project organization chart is provided in Figure 1.1.

The Project Company holds the ultimate responsibility for the environmental and social performance including the performance of its contractors and overall accountability for the compliance of the Project activities during both construction and operation phases. It is the responsibility of the Project Company to oversee and monitor the implementation of relevant environmental and social (E&S) elements by subcontractors during the construction phase. This includes auditing and assessing subcontractors' implementation of the relevant E&S aspects, ensuring that corrective actions are taken when necessary to maintain performance in line with international standards and good international industry practice (GIIP).

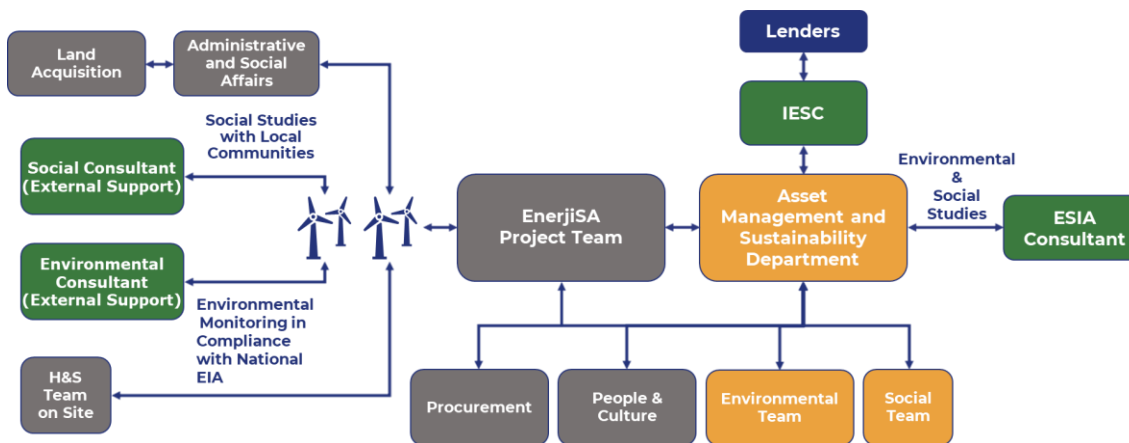


Figure 1.1: Project Organisational Chart

Source: Provided by the Project Company on 14 May 2024.

1.3 ESIA Objective and Requirements

The objective of the ESIA is to identify and assess the severity of potential impacts on receptors and identified resources; develop and describe mitigation measures that will be taken to prevent or minimize any potential negative effects and maximize the potential benefits; and communicate the severity of residual impacts that will remain once the mitigation has been applied. In the context of project financing requirements, as outlined in section 1.1 above, the ESIA study has been conducted to meet primarily the requirements of the following international standards:

- International Finance Corporation (IFC)'s Environmental and Social Policy & Performance Standards (2012)
- IFC's Environmental, Health and Safety (EHS) General Guidelines (2007)
- IFC's EHS Guidelines for Electric Power Transmission and Distribution (2007)
- IFC's EHS Guidelines for Wind Energy (2015)
- Equator Principles IV (2020)
- The Organization for Economic Cooperation and Development (OECD) Recommendation of the Council on Common Approaches on the Environment and Officially Supported Export Credits – "The Common Approaches"
- IFC/KfW/ European Bank for Reconstruction and Development (EBRD) Post-construction Bird and Bat Fatality Monitoring for Onshore Wind Energy Facilities in Emerging Market Countries - Good Practice Handbook (2023)
- EBRD's Environmental and Social Policy & Performance Requirements (2019)
- IFC/EBRD's Guidance Note on Workers Accommodation: Processes and Standards (2009)

- U.S. International Development Finance Corporation (DFC)'s Environmental and Social Policy and Procedures (2020)
- International Labour Organization (ILO)'s fundamental conventions concerning the abolition of child labour, the elimination of discrimination at the workplace and forced/compulsory labour.

In addition to these standards, the Project comply with Turkish environmental and social legislation. The relevant European Union (EU) Directives and good international industry practices are also applicable to the Project.

1.4 Assessment Topics

The assessment has been broken down by topic to reflect the scope of the ESIA agreed with the Project Lenders. These topics are as follows:

- Water Quality, Hydrology and Hydrogeology
- Land Use, Soil and Geology
- Air Quality
- Climate and Greenhouse Gases
- Noise and Vibration
- Landscape and Visual
- Shadow Flicker
- Waste and Resources
- Biodiversity
- Social Environment
- Labour and Working Conditions
- Community Health and Safety (Water, Noise and Air Quality, Structural safety, Life and Fire Safety, Traffic Safety, Abnormal Load Transportation, Transport and Storage of Hazardous Materials, Disease Prevention, Emergency Preparedness and Response, Ecosystem Services, Public Access and Security Personnel)
- Cultural Heritage
- Cumulative Impacts
- Stakeholder Engagement, Information Disclosure and Consultation

1.5 ESIA Scope and Methodology

Lenders have confirmed the category of the Project as Category A in accordance with their E&S Policies.

The initial stage of the ESIA process involves screening current conditions to determine if a study is needed for the proposed project, aligning with the lender's categorization criteria. The ESIA study is deemed necessary, and a Scoping report has been submitted to lenders, outlining the scope of the assessment. The final scope, agreed upon after reviewing justifications for certain excluded impacts, includes considerations for water quality, hydrology, hydrogeology, geology, soils, air quality, traffic, transport, archaeology, and cultural heritage during the construction phase. Landscape, visual and shadow flicker impacts are only considered within the scope during the operation phase. Climate change, Greenhouse gases, noise and vibration, waste and resources, biodiversity and social impacts are scoped in for both construction and operation phases. It is to be noted that ESIA does not assess the likely impacts that may arise from the decommissioning phase. A decommissioning plan must be developed five years prior to decommissioning, including a full impact assessment and mitigation plan.

Criteria of the magnitude, sensitivity of a receptor, types of effect and evaluation matrix are determined within the scope of the ESIA methodology. In addition, the assessment of cumulative impacts (combination of multiple effects) has been considered as a part of ESIA methodology.

1.6 Previously Carried out Environmental & Social Studies

The Project Company secured a pre-license for the Project on 10 February 2022, which was issued by the Energy Market Regulatory Authority (EPDK) and is valid for twenty-four months,

however, the pre-license has been subject to an amendment due to the changes in Project design criteria. Therefore, the latest positive consent letter was obtained from Ministry of Energy and Natural Resources (MoENR) on 27 March 2023 regarding this change. In accordance with the relevant provisions of the national regulations governing National Environmental Impact Assessment (EIA) studies, the baseline environmental and social activities were conducted. According to information received by the project company on May 23, 2024, the Pre-license Expiration Date has been extended until May 10, 2025.

An Environmental Consultancy Company named Nartus, with a competency certificate, prepared the National EIA Report, which was submitted to the Ministry of Environment, Urbanization and Climate Change (MoEUCC) in March 2023. The opinions of several institutions were requested during the National EIA process. According to the received opinion letters, a number of important concerns are noted as described below. These concerns and opinions are assessed and necessary mitigation measures are defined in relevant chapters of the ESIA report prepared for the Project.

Within the scope the received opinion letters, several institutions have addressed important concerns. Firstly, Ministry of Energy and Natural Resources, General Directorate of Mining and Petroleum Affairs, Special Areas and Map Department has emphasized that, the examination of the Project area has concluded with a favourable evaluation of the Project. As a result, the Project has been registered in the Authority's system as "Hacıhıdırlar WPP Special Permit Area" under number ER: 3419240, as identified within the provided coordinates. Therefore, it was noted that there is no objection from the Authority to the finalization of the Project. In addition, it was stated that, Project area intersect with geothermal resources and mineral water exploration license area under number ER:3388859, for this reason Project company should obtain relevant Governorship opinion.

Secondly, Aydın Metropolitan Municipality Directorate of Environmental Protection and Control has reported that in accordance with the Environmental Law No. 2872, all necessary precautions must be taken for all kinds of liquid wastes, gaseous wastes, dust emissions, noise, excavation wastes, solid wastes and all other hazardous and non-hazardous wastes, and ground and surface waters must not be damaged.

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

Within the scope of the National EIA studies, social impact assessment studies were conducted as well. The public participation meetings were carried out in Aydın and Denizli provinces within the scope of the National EIA Studies. Public participation meetings were conducted on 7 December 2021 in Aydın, Karacasu District, Işıklar Neighbourhood and on 7 December 2021 in Denizli, Babadağ District, Kiranyer Neighbourhood. These meetings aimed to engage with the public, provide information about the Project, and gather their feedback regarding the Project. The discussions held during these meetings were documented in final National EIA report. The questions and concerns shared by the participants are presented in Section 3.16 of this NTS.

Furthermore, within the scope of the National EIA studies, biodiversity assessment studies, baseline environmental measurements/analyses such as noise and air quality measurements, assessment of electromagnetic pollution were also conducted.

Upon submission of the Final EIA Report to the MoEUCC General Directorate of Environmental Impact Assessment, Permit and Inspection, the EIA Positive Decision for the Project was published on 03 April 2023 by the MoEUCC. The Consultant has been informed that permitting

process for the Electrical Transmission Line (ETL) is being managed by Turkish Electricity Transmission Corporation (TEIAS) including preparation of the National EIA. The Project Company has provided the Final Project Introduction Document dated 28 September 2023. However, the decision issued by the MoEUCC has not been provided yet. According to information shared with the Consultant, the target date for securing EIA decision from the MoEUCC is 19 July 2024. Expropriation process of the ETL will commence once permitting processes of the WPP are completed.

The outputs of the completed National EIA studies are evaluated by the Consultant, and the gaps analysed within the scope of the ESIA Report to assess the Project's compliance with the applicable national and international environmental, health, safety, and social standards. The identified compliance gaps include any additional data that should be collected, and any additional assessments required for the Project to meet the applicable standards.

1.7 Timeline

The tasks undertaken to support this ESIA including baseline data collection, public consultation, detailed assessment as noted below:

- The detailed design phase of the Project has commenced.
- The National EIA Positive decision secured in December 2022¹.
- Primary ESIA baseline data collection performed from October 2023 to November 2023.
- Draft ESIA Report to be submitted to the Lenders in May 2024.
- The disclosure period of the Final Draft ESIA in planned to start in June 2024.
- Final ESIA Report to be submitted in August 2024.

1.8 Grievance Mechanism Channels of the Project

- 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[This information is not yet available for the Project since there is no active administration office. The information will be included when the office is determined.]
 - Phone number of the Head Office: (0216) 512 40 00
- Project e-mail address: yekares2@enerjisauretim.com
- Project website: <https://yekares2.enerjisauretim.com>
- Posters that are hung in common areas of the Project affected neighborhoods (i.e., teahouses and/or mukhtars' offices), indicating what the clear communication channels are
- The grievance form disclosed on the Project website² that enables anonymous grievance applications.

Contact Details of the Community Liaison Officer (CLO)

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

¹ On 15 June 2023, local community members filed a case to annul the positive EIA decision for the Project. The discovery was made by the Experts elected on 6 July 2023, and the Experts Opinion Report was prepared and submitted on 11 November 2023. The Project Company is currently conducting additional studies and plans to submit the revised assessments and request to obtain a positive decision on the revised EIA from the MoEUCC in July 2024.

² The link of the grievance form on the Project website will be included once finalized.

1.9 NTS Structure

The NTS is structured as follows:

Table 1.1: Report Structure

Section	Title
Section 1	Introduction
Section 2	Project Description
Section 3	Environmental and Social Impacts and Mitigations
Section 4	Project Environmental and Social Management System

2 Project Description

2.1 Project Overview

Need for the Project

Energy is a pivotal factor in both production processes and human settlements, serving as a key indicator of a country's economic and social development. The global energy crisis and the Covid-19 pandemic have underscored the necessity for a secure, affordable, and people-centric transition in energy generation. With a growing demand for primary energy, Türkiye faces challenges due to its reliance on non-renewable resources, particularly fossil fuels. These not only contribute to climate change but also pose threats to ecosystems and human life.

In response, Türkiye aims to strategically integrate renewable energy resources, such as wind, solar, biomass, wave, and current, into its economy to ensure resource diversity and sustainable development. This initiative seeks to enhance the efficient use of public resources by expanding renewable energy power plants, supporting local resilience, and diversifying the country's energy mix.

The Project, particularly focusing on wind power, aligns with global trends, contributing to national renewable energy targets and reducing external energy dependency. By leveraging Türkiye's existing wind energy potential, the project addresses climate change concerns and diminishes reliance on fossil fuels. In essence, this initiative holds strategic significance, aligning with national objectives and promoting sustainable energy practices.

Project location and layout

The Project licence area falls within two province of Türkiye; namely Aydın and Denizli, which are located in Aegean region of Türkiye. Figure 2.1 provides the locations of Aydın and Denizli provinces in Türkiye.



Figure 2.1: Aydın and Denizli Provinces of Türkiye where the Project License Area Falls within³

Source: Mott MacDonald

³ Blue colour represents Aydın, purple colour represents Izmir, and green colour represents Manisa.

According to the Wind Power Plants Report published by Türkiye Wind Energy Association (TÜREB), considering the share of wind turbine power plant in operation in the Aegean Region Aydın ranks ninth with an installed capacity of 366.50. MWm (3.45% share) and Denizli ranks twenty sixth with an installed capacity of 74.80. MWm (1.13% share). With the Hacıhıdırlar WPP Project, it is aimed to contribute to the national energy strategy targets as well as regional economy by utilizing the wind potential of Aydın and Denizli provinces.

2.2 Project Components

There are three main units of the Project namely the turbines for energy production, the switchyard transmitting energy to the grid, and access roads for transportation. In addition to the Project components, an ETL will be constructed as an Associated Facility for the Project.

The Project components including the access roads and ETL are provided in Figure 2.2.

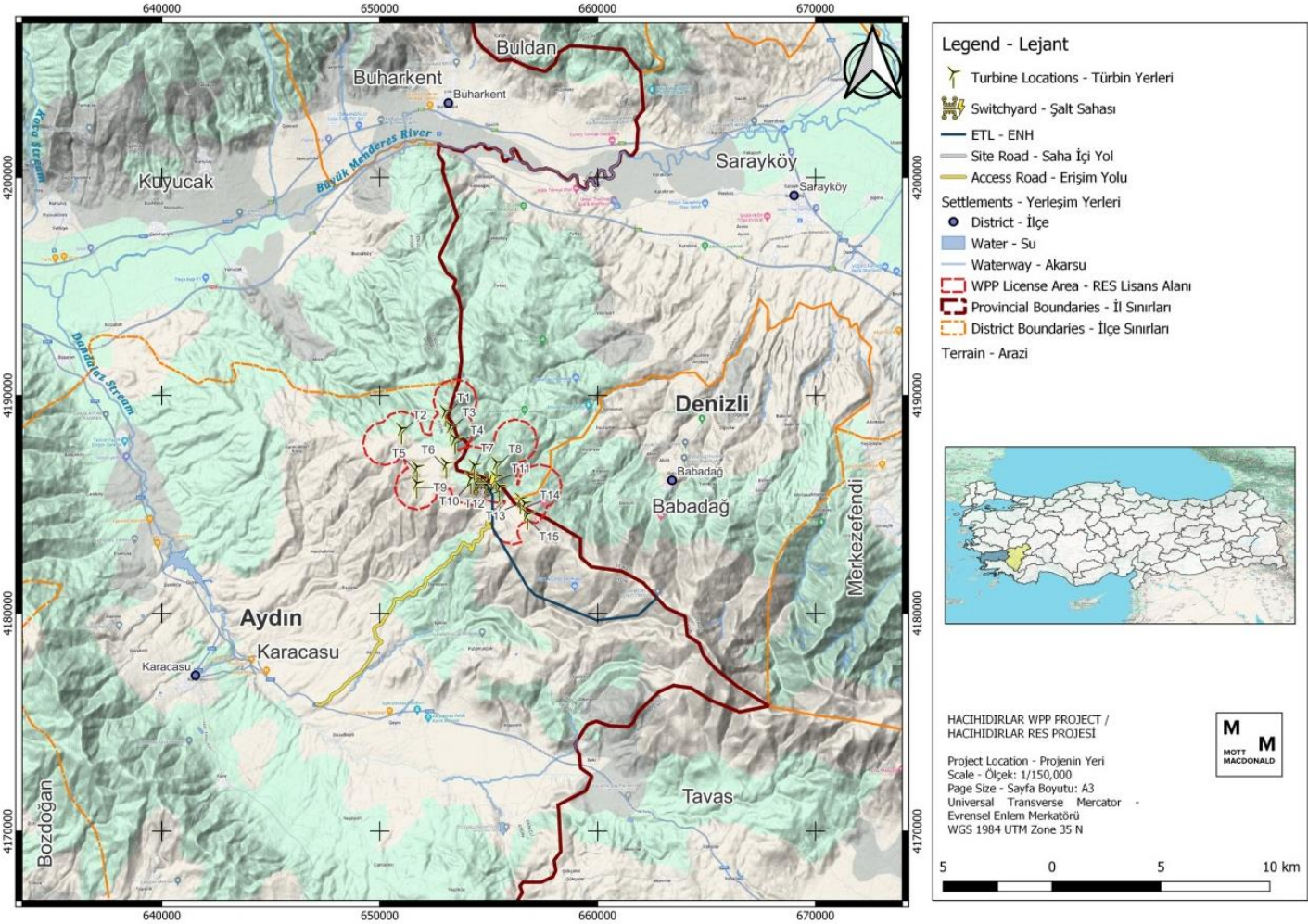


Figure 2.2: The Project Components Including the Access Roads and ETL

Wind turbines: The Project comprises to build 15 horizontal wind turbines (Figure 2.3) to generate a maximum of 63 MWm of power for the national grid. Wind turbines, the main components of wind power plants, operate on a simple principle: they convert the kinetic energy of moving air into mechanical and then electrical energy. As the wind turns the turbine blades around the rotor, connected to a main shaft, a generator produces electricity. The turbines which will be used in the Project typically have two or three blades and include a foundation, tower, nacelle (containing essential components), generator, rotor hub, and rotor blades.

In full load operation mode, with wind speeds above 15 m/s, the turbine limits power to 4,200 kW. In partial load mode (wind speeds between 2 m/s and 15 m/s), the turbine adjusts rotor speed for optimal power extraction. In idle mode (wind speed below 2 m/s), the turbine slows or stops, preventing power feed into the grid. This minimizes strain on the rotor in low-wind conditions.

The wind turbine is equipped with a number of safety devices in order to keep the wind turbine within a constantly safe operating range. These safety devices include components for safe stopping of the wind turbine as well as a system of sensors. The sensor system records all relevant operating states of the wind turbine and feeds the information into the SCADA⁴, which is a control system architecture comprising computers, networked data communications and graphical user interfaces for high-level supervision of machines and processes, remote system of Enercon⁵ (type of wind turbine). The safety equipment and sensor systems of the wind turbine are emergency stop button, main switch, redundant sensors, speed monitoring, air gap monitoring, oscillation monitoring, temperature monitoring, nacelle-internal noise monitoring, and cable twisting monitoring systems.

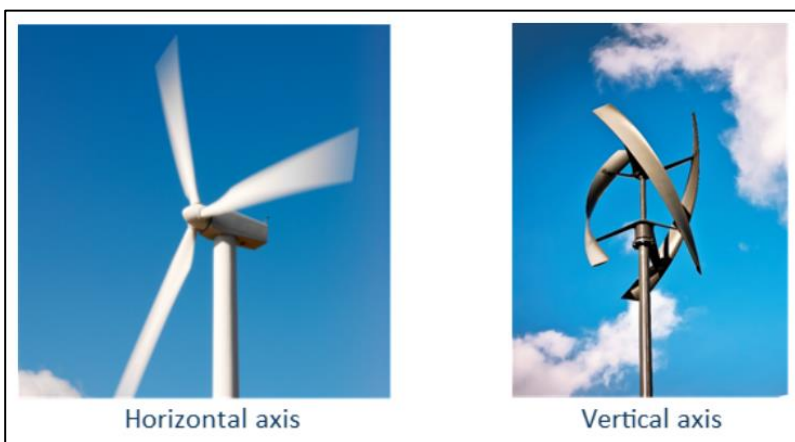


Figure 2.3: Types of Wind Turbines⁶

Source: Energy Knowledge Base (n.d) Wind Power
<https://energyknowledgebase.com/topics/wind-power.asp>

The switchyard: The wind turbines will be connected at the switchgear panels through a cross linked cabling system to the switchyard located within the Project area. The connection between

⁴ Supervisory Control and Data Acquisition

⁵ ENERCON GmbH, n.d. WEC Components. Accessed from <https://www.enercon.de/en/technology/wec-components/> on 02 November 2023

⁶ The shaft that carries rotational energy from the blade to the generator in wind power technology can be positioned vertically or horizontally. The horizontal axis is the most widely used. The vertical axis is not as widely used.

the turbines and the switchyard will be made using underground transmission cables buried in ground. The cables are selected as AL core XLPE insulated underground MV cables. The connection between the switchyard and substation will be provided by 154 kV 12.5 km single circuit transmission line.

Access Roads and Site Roads: The Project involves two types of roads: access roads, connecting the existing transport road to the site, and site roads, the path along the wind turbines in the Project area. According to the Project Company and the National EIA Report, no additional roads are expected to be opened during construction. If needed, improvements will be made to existing roads. The connection to the Project area will be through D585 Highway Connection and connection roads through Ataköy-Babadağ-Sarayköy neighbourhoods, referred to as "access roads" in this NTS. According to National EIA, within the scope of the Project, new roads will be constructed of approximately 17,727 m.

As mentioned, it is anticipated that road construction will be performed inside and the outside the Project licence area. Although the route of the access roads is broadly fixed, there may be adjustments to the final design, which will be consulted upon with relevant stakeholders, including community members, as necessary.

Mobile Crushing and Screening Facility: As a result of the technical evaluations and completing the geological-geotechnical survey reports regarding the Project Area, the "Mobile Crushing and Screening Facility" in the Project have been not necessary and removed from project construction phase.

Administration Building: An administration building will be constructed in the switchyard area for the Project. The administration building will consist of the Enercon SCADA⁷, which is a control system architecture comprising computers, networked data communications and graphical user interfaces for high-level supervision of machines and processes, system room, a working station for the monitoring of the Project, and facilities for maintenance personnel as deemed necessary, as well as storage areas. The Administration Building is designed to deploy full operational staff, not only technical but also administrative staff.

Project Associated Facility (Electricity Transmission Line): Associated facilities are facilities or activities that are not funded as part of the Project, but which are significant in determining the success of Project or in producing agreed project outcomes. In addition to the Project components, the Project activities also cover construction of the ETL for connection of the generated electricity to the national grid. The ETL will be constructed by Enerjisa Üretim, but the ownership will be under to TEIAS once connection is completed. The Consultant has been informed that permitting process for the ETL is being managed by TEIAS. The Project Company has provided the Final Project Introduction Document dated 28 September 2023. However, the decision issued by the MoEUCC has not been provided yet. Expropriation process of the ETL will commence once permitting processes of the WPP are completed.

The wind turbines will be connected at the switchgear panels through a cross linked cabling system to the switchyard located within the Project area. The connection between the turbines and the switchyard will be made using underground transmission cables buried in ground. The cables are selected as AL core XLPE insulated underground MV cables. The connection between the switchyard and substation will be provided by one 154 kV single-circuit overhead transmission line of approximately 12.5 km for connection to Denizli Transformer Substation, which is currently operated by TEIAS.

According to the Project Information Document (PID) prepared for the ETL to be constructed within the scope of the Project, excavation works will be performed to open the pits where the pylons will be placed. A total of four pits, each with a depth of 3 m and and a surface area of 9

⁷ Supervisory Control and Data Acquisition

m², will be dug for each pylon. Excavated materials will be stored nearby storage area and used to backfill the excavated pits.

At this stage, the ETL is the only facility identified as an Associated Facility to the Project. There will not be any other facility considered as a project Associated Facility such as quarries, borrow pits, wastewater treatment plant, landfilling site, etc.

2.3 Project Activities

Project activities are planned to consist of three phases:

- Pre-licence (permitting) phase, encompassing the completion of necessary design measurements and permitting processes.
- Construction (licence) phase, involving site preparation, infrastructure, and assembly operations as well as commissioning test studies.
- Operation (production licence) phase, where the connection to the interconnected system is established through temporary-final acceptance processes, enabling electricity production.

The construction of the Project has been initiated in the fourth quarter of 2024 with the construction of Project roads and is planned to be completed by the third quarter of 2025.

Within the scope of the Project, the construction phase is expected to be 13 months, and the duration of operation phase will be 49 years. It is expected that the total number of workforce for the construction phase will be 157 at peak times, seven Enerjisa Üretim employees and 150 subcontractor employees, while this number is expected to be seven during the operation phase.

The breakdown of workforce (e.g. national/international, gender etc.) will be monitored and reported during construction phase.

Within the scope of the Project, the utility water to be supplied from the licensed water supply contractor will be delivered by water trucks and used during the construction phase to meet the personnel needs as well as to prevent generation of dust during construction activities. At the current state of construction phase planning, no rainwater harvesting is planned on site. The Project company ensures that the water supply needs will be met by the licensed companies all throughout the construction phase. According to the information shared by the Project Company, the amount of water to be supplied is within the capacity of the local water suppliers and will not have a major impact on the local water sources.

The fuel will be used due to the use of construction equipment and machinery and during the transportation of Project's workers during the construction phase. The fuel will be stored in above-ground storage tanks located in the mobilization areas.

The electricity to be used in the Project construction area will be supplied from the national grid or diesel-fired generators.

Excavated surplus material will be reused for filling purposes.

Within the scope of the Project, utility water to be supplied from the licensed water supply contractor will be used during the operation phase to meet the personnel needs. According to the information shared by the Project Company, the amount of water to be supplied is within the capacity of the local water suppliers and will not have a major impact locally.

During the maintenance and repair of the turbines within the Power Plant, chemical substances are employed. The utilized chemical materials will be temporarily stored in dedicated storage areas provided with secondary containment and then sent for disposal through licensed companies.

2.4 Area of Influence

As defined in IFC PS1, Area of Influence (Aol) encompasses the following, as appropriate:

- The area likely to be affected by: (i) the project and the client's activities and facilities that are directly owned, operated or managed (including by contractors) and that are a component of the Project; (ii) impacts from unplanned but predictable developments caused by the Project that may occur later or at a different location; or (iii) indirect Project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are dependent.
- Associated facilities, which are facilities or activities that are not funded as part of the Project, but which are significant in determining the success of Project or in producing agreed project outcomes. These would not have been constructed or expanded if the project did not exist and without which the Project would not be viable.
- Cumulative impacts that result from the incremental impact, on areas or resources used or directly impacted by the Project, from other existing, planned or reasonably defined developments at the time the risks and impacts identification process is conducted.

The Area of Influence (Aol) covers all land or water, directly or indirectly impacted by the Project, and therefore extends beyond the Project boundary. This includes communities and areas adjacent to the Project Affected Area (PAA) that may experience impacts during the construction or operation of the Project, despite being located outside of the area in which the Project will be located e.g., air or noise impacts. The Aol is defined on a topic-by-topic basis, as each topic will define its Aol based upon the potential effects.

2.5 Analysis of Alternatives

In order to make sure that the goals of the proposed Project have taken into account social, environmental, economic, and technological choices, it is necessary to evaluate different project designs and activity alternatives in accordance with best practises for ESIA Study. During the feasibility stage, the following project alternatives were taken into account:

- No Project Alternative;
- Location Alternatives; and
- Design Alternatives.

Detailed evaluation of locations as well as design of Project components was conducted in terms of various environmental and social factors including avoidance of designated sites, cultural heritage aspects, bird migration routes, community health and safety aspects as well as community acceptance, conditions of physical displacement etc. The Project avoids known major migratory routes of species, however might overlap some minor routes. The turbine locations were also evaluated within the framework of the authorities and responsibilities of relevant public institutions and organizations. The change was notified to the Ministry of Energy and Natural Resources, General Directorate of Energy Affairs and the National EIA Report was prepared based on last declared locations.

As a result of these careful considerations, the Project area, turbine locations and design subject to this ESIA Study have been selected as the most favourable locations for realisation of Hacıhıdırlar WPP.

2.6 Site selection

There are several factors considered during the site selection process to ensure minimal environmental impact and optimal energy generation.

- Legal requirements: Within the scope of the "Competition Announcement for the Allocation of Renewable Energy Resource Areas and Connection Capacities Based on Wind Energy" published in the Official Gazette dated 7 November 2018 and numbered 30588, Enerjisa

Üretim was selected for the Aydın and Denizli region by the Ministry of Energy and Natural Resources on 30 May 2019. The YEKA contract was signed on 9 March 2020, and the region where the Project is located was transferred to Enerjisa Üretim on 21 March 2021. Accordingly, the Project area has been determined by the General Directorate of Energy Affairs of the Ministry of Energy and Natural Resources.

- Access to and within the Project Area: The Project Company confirmed during the Consultant's site visit that the existing roads will be used for access to the Project area to the extent possible, and where found necessary, improvements and additions will be made to the existing roads. The ease and readiness of access is one of the factors that made the Project area favourable for this investment.
- Wind Potential of the Project Area: The Project Company plans to install 5 turbines in Aydın and 10 in Denizli. The Türkiye Energy Potential Map (REPA) indicates a maximum wind speed of 9.69 m/s and 8.15 m/s in Aydın and Denizli respectively, with average of 4.59 m/s and 4.13 m/s. Project-specific wind measurements indicates an annual average speed of approximately 5-6 m/s.
- Avoiding designated ecological and cultural heritage sites: While selecting the locations of Project components within the license area as well as the associated facilities, the designated ecological and cultural heritage sites are taken into consideration and avoided to avoid or minimize the impacts. During site selection process national authorities do not consider key Biodiversity Areas (KBAs) as a factor since those are not nationally recognized, however KBAs are internationally recognized areas that carry ecological significance and the Project overlaps Akdag – Denizli KBA.
- Avoiding physical displacement regarding land acquisition: While determining the lands needed for the Project, criteria that will minimise the negative social and economic impacts arising from land acquisition have been taken into consideration by avoiding resettlement as much as possible. For this purpose, in the determination of the Project area, state lands were preferred by avoiding private parcels and physical displacement, especially living areas with buildings, as much as possible where technical conditions are suitable. Collective findings indicate that the Project aligns with the existing land use patterns and regulatory frameworks, fostering socially responsible land acquisition process that Project Affected Persons (PAPs) are approached in a sensitive manner.

3 Environmental and Social Impacts and Mitigation

3.1 Overview

The proposed project is a green energy project proposing to generate electricity through wind energy. Impacts due to proposed wind energy project are short term, generally limited to construction phase and operation phase have negligible to critical environmental, ecological and social impacts.

3.2 Summary of Impacts and Mitigation Measures

The Project and its key components such as access and site roads, administration building, and switchyard, are likely to have potential environmental impacts on baseline parameters such as land use, ambient air quality, noise quality and waste management in the immediate vicinity of the Project area during the construction phase, the Project is also likely having potential impact on the biodiversity in immediate area. The Project shall prove to be beneficial in terms of employment generation, reduction in greenhouse gases emission, community benefits through corporate social responsibility (CSR) activities.

The outcomes of the comprehensive assessment of identified impacts without mitigations during the construction and operation phases are outlined in below table.

Topics	Occurrence of the Impact	Receptor	Impact Significance without mitigations
Construction Phase			
Water Quality, Hydrology and Hydrogeology	Use of Water Resources	Surface water bodies	Moderate
		Groundwater bodies	Minor
	Water Quality Alteration: Surface water contamination due to runoff from construction of temporary and permanent impermeable hard surfaces, accidental spills, wastewaters, sewage, and cleaning of equipment	Surface water bodies	Moderate
	Water Quality Alteration: Groundwater contamination due to accidental spills, wastewaters, sewage, and cleaning of equipment	Groundwater bodies	Minor
	Alteration of Water Flow Systems	Surface water bodies & Groundwater bodies	Minor
	Alteration of Surface Water & Groundwater Interaction	Surface water bodies & Groundwater bodies	Minor
Land Use, Soil and Geology	Land Loss / Impacts on arable lands	Lands having land use capability of Class V-VI	Moderate
	Land Loss / Impacts on arable Lands	Lands having land use capability of Class VII-VIII	Negligible
	Soil Contamination	Lands having Class V-VIII land use capability	Negligible

Topics	Occurrence of the Impact	Receptor	Impact Significance without mitigations
	Topsoil Stripping	Lands having land use capability of Class V-VIII	Minor
	Stability of Structures after Earthquake	Project Area	Major
		Project Components	
	Stability of Structures after Soil erosion	Moderate risk areas	Moderate
	Stability of Structures after Soil erosion	Severe risk areas	Minor
Biodiversity	Habitat loss and degradation Disturbance Air pollution Death or injury AIS competition	Akdag-Denizli KBA	Major
	Habitat loss and degradation Air, soil and water pollution Artificial light Dust emissions Disturbance Accidental injury or death	Mammals (excluding bats)	Minor
Air Quality	PM ₁₀ and PM _{2.5} emissions	Nearby receptors	Insignificant
Noise	Noise	Nearby receptors	three Major, one "Moderate", one "Negligible" and 11 "No Impact"
Social Environment	Population	Local community members / Project affected neighbourhoods	Negligible
	Education	Local community members / Project affected neighbourhoods	Negligible
	Land Use and Economic Displacement	Local community members whose lands are acquired-expropriated / Formal and informal users of the acquired-expropriated lands	Major
	Local Economy, Livelihood Sources and Employment	Local community members	Moderate
	Infrastructural Services	Local community members / Project affected neighbourhoods	Minor
	Gender	Local community members	Negligible
	Vulnerable Groups	Local community members who are in a more disadvantaged position	Negligible
Labour and Working Conditions	Working Conditions and Terms of Employment	All Project workforce (including subcontractors and supply chain workers where relevant)	Moderate
	Fair Treatment, Non-Discrimination and Equal Opportunity for Workers		
	Workers' Organisations		
	Workers' Grievance Mechanism		

Topics	Occurrence of the Impact	Receptor	Impact Significance without mitigations
	Management of Contractors, Subcontractors and Supply Chain (Including Child and Forced Labour)		
	Overtime Working without Workers' Consent and/or Compliance with National and International Requirements		
	Conditions In Construction Camps and Other Facilities		
	Retrenchment and Demobilisation Risks		
	Gender-Based Violence and Harassment (GBVH) Risks	All Project workforce/ Local community members / Project affected neighbourhoods	Moderate
	Increase In Local Employment Rates Through Employment Opportunities Created by The Project		
Community Health and Safety	Water quality and availability	Groundwater bodies	Negligible
	Air Quality	Local community members / nearby settlements	Negligible
	Noise	Local community members / nearby settlements	Negligible
	Structural safety of Project Infrastructure	Project Area / Components	Minor
	Life and Fire Safety	Forest Area	Minor
	Traffic Safety	Passengers on Sarıgöl-Ödemiş State Road Students	Minor
	Abnormal Load Transportation	Passengers on Sarıgöl-Ödemiş State Road	Negligible
	Transport and Storage of Hazardous Materials	Local community members / nearby settlements Groundwater bodies	Negligible
	Disease Prevention	Local community members / nearby settlements	Negligible
	Emergency Preparedness and Response	Local community members / nearby settlements	Minor
	Ecosystem Services	Local community members benefiting from ecosystem services	Negligible
	Public Access	Local community members / nearby settlements	Negligible
	Security Personnel	Local community members / nearby settlements	Negligible
Operation Phase			
Biodiversity	Habitat loss and degradation Disturbance Air pollution Death or injury AIS competition	Akdag-Denizli KBA	Minor
	Collision / barotrauma mortality	Bats	Major
	Artificial light	Bats	Moderate

Topics	Occurrence of the Impact	Receptor	Impact Significance without mitigations
	Collision / electrocution mortality	Large soaring migratory birds of Turkish flyways Large soaring resident bird species Birds CR, EN, VU species Large soaring migratory birds of Turkish flyways Large soaring resident bird species All other bird species	Minor to Major
	Artificial light	Birds	Minor to Major
Vibration	Vibration	Nearby Receptors	three "Moderate", one "Minor" and 12 "No Impact"
Social	Local Economy, Livelihood Sources and Employment	Local community members	Negligible
Labour and Working Conditions	Working Conditions and Terms of Employment	All Project workforce (including subcontractors and supply chain workers where relevant)	Moderate
	Fair Treatment, Non-Discrimination and Equal Opportunity for Workers		
	Workers' Organisations		
	Workers' Grievance Mechanism		
	Gender-Based Violence and Harassment (GBVH) Risks		
	Increase In Local Employment Rates Through Employment Opportunities Created by The Project	All Project workforce/ National wind industry workforce	Moderate
Community Health and Safety	Blade Ice Throw	Local community members / nearby settlements	Major
	Aviation	Helipads nearby	Minor
	Electromagnetic Interference and Radiation	Local community members / nearby settlements	Minor
	Traffic Safety	Local community members / nearby settlements	Negligible
	Shadow Flicker	Local community members / nearby settlements	Major
	Public Access	Local community members / nearby settlements	Negligible
	Security Personnel	Local community members / nearby settlements	Negligible
	Noise	Local community members	Minor
Construction and Operation Phases			
Waste and Resources	Soil Contamination due to poor waste management	The land where the Project is situated possesses characteristics typical of agricultural lands not suitable for soil cultivation and non-arable lands.	Minor

Topics	Occurrence of the Impact	Receptor	Impact Significance without mitigations
	Life and Fire Safety vulnerability due to not properly stored waste	Forest Area, the Project area and residents who lives in the near settlement	Moderate
	Poor management of high-volume excavation waste due to insufficient storage conditions onsite and offsite.	Existing local excavated soil disposal waste disposal areas and the Project area Local community members / nearby settlements to be affected from Community Health and Safety related concerns by transport of waste from site to waste disposal areas	Moderate to High
	Increase in load on the capacity of existing waste recycling/landfilling facilities	Existing local waste disposal facilities including landfills, waste transfer stations (TS)	Moderate
	Runoff from the exposed soil and concrete stockpiles	Surface water bodies	Moderate
	Groundwater contamination due to poor waste management	Groundwater	Minor
	Increase in the load on the capacity of the existing wastewater treatment plants	The land where the Project is situated possesses characteristics typical of agricultural lands not suitable for soil cultivation and non-arable lands.	Minor
Biodiversity	Habitat loss and degradation	Natural Habitats Modified Habitats	Major Minor
	Habitat loss and degradation Air, soil and water pollution Dust emissions AIS competition	Flora	Major and Minor
	Habitat loss and degradation Air, soil and water pollution Dust emissions Disturbance	Bats	Negligible
	Habitat loss and degradation Air, soil and water pollution Dust emissions Disturbance Accidental injury or death	Birds <i>Herpetofauna</i> <i>Testudo graeca</i> <i>Rana tavasensis</i>	Minor

3.3 Water Quality Hydrology and Hydrogeology

As a result of baseline studies the following results are examined.

- The Project area is located within the Büyük Menderes Basin
- The nearest significant surface water body is to the Project area is Büyük Menderes River, which is located approximately 11 km away in the north
- According to the National EIA Report prepared for the Project, almost all of the project license area and turbine locations have been formed by the Paleozoic Esme Metamorphites (Pze), consisting of gneiss, migmatite, metagranitoid, metagabbro, amphibolite and marble,

and the Kestel formation (Pzk), consisting of metaryolite, schist, phyllite, quartzite, metaspilite and marble.

A 3 km radius from the site is used to assess water (both groundwater and surface water) derived receptors. It is considered that beyond this distance, natural processes such as attenuation and dilution of substances is expected to occur. Therefore, the proposed development is unlikely to have a hydrological effect beyond the area of influence. In addition, no significant impacts associated with the following aspects are considered during the implementation of the Project:

- No significant impact on water sources is anticipated due to activities to be carried out during operation phase.
- The Project area does not fall within any floodplain and no decision taken by the regulatory authorities indicating that the site is in an area that may subject to flood. Therefore, no flood risk is likely to cause.
- The groundwater and surface water usage are not planned within the scope of the Project; therefore, no significant impact is anticipated on water quantity of groundwater and surface water bodies due to water consumption. Therefore, no impacts related to direct withdrawal of water bodies in changing water flows is anticipated.

The following impacts on water quality, hydrology and hydrogeology have the potential to take place during the construction phase of the Project.

Use of water resources: There will be numerous activities that would use water during construction. According to the information shared by the Project Company the construction period of the Project will be 13 months. Hence, potentially significant amounts of water would be needed. Water will come from licensed sources which have been confirmed to have sufficient capacity to supply the project without impacting supply to existing local users. The amount of drinking and potable water for the personnel planned to work within the scope of the Project is determined as 216 L/person-day.

Water quality alteration: traffic at the site due to transport of material could increase the risk of the accidental spills which is likely to cause contamination on surface water. Elevated levels of the materials contain environmental pollutants originating from routine construction activities such as dust creation and settlement and coliform bacteria from human waste may also interfere to water resources via surface runoff and may have significant impacts on water quality. Stormwater is made up of flows and surface runoff from a variety of sources, such as drainage and precipitation. Stormwater runoff includes a variety of contaminants, including suspended sediments, metals, petroleum hydrocarbons, and coliform. Moreover, even from clean rainwater, fast runoff can erode streambeds and banks, lowering the quality of the water that is eventually received. Furthermore, soil erosion may be in question locally due to ground surface disturbance. Depending on the erosion potential of the soil, local terrain, vegetation cover, and distance to the surface water bodies, soil erosion may lead to degradation of water quality in nearby surface water bodies.

Alteration of water flow systems: Construction activities, including excavation and trenching, could potentially impact natural surface water and groundwater flow systems, including agricultural drainage channels.

Alteration of surface water and groundwater interaction: construction activities such as excavation could have a risk to conduit between a surface water body and groundwater aquifer or between two aquifers by breaching the hydrologic barriers. This could result in unwanted dewatering or recharge of any of these water resources depending on local hydrogeologic conditions. The Project area has low hydrogeological permeability due to its unique morphology and features of the rock. Groundwater potential is also low. Anticipated alterations to water flow

systems and surface water and groundwater interaction are minor. The impact is localised within the area of the influence and unlikely to significantly affect local livelihoods.

Mitigation Measures

Specific mitigation measures to avoid and/or mitigate the potential impacts on surface water and groundwater during construction phase are shared below.

- Accidental spill prevention will be ensured by developing and implementing the “Emergency Preparedness Response Plan”.
- Construction workers and relevant staff will be trained related to the implementation of good construction site practices and on spill response and prevention measures.
- Compliance with rules of material storage and use, waste storage and its timely removal. A material storage area will be determined in accordance with the requirements determined in the “Waste and Wastewater Management Plan”.
- Water Quality Management Procedure will be developed to provide management procedures, mitigation measures, and other requirements e.g., training, Key Performance Indicator (KPIs) for unplanned events related to spills and flooding for both construction and operation phase.
- Fuel will be used due to the use of construction equipment and machinery and during the transportation of Project’s workers during the construction phase. The fuel will be stored in above-ground storage tanks located in the mobilization areas.
- Adequate secondary containment for fuel storage tanks and for the temporary storage of other fluids such as lubricating oils and hydraulic fluids will be provided.
- Personnels will be trained on the correct transfer and handling of fuels and chemicals and the response to spills.
- Suitably sized impervious bunds or other containment will be installed where hazardous materials are handled to prevent hazardous materials entering the site drainage.
- Use of the existing roads for material delivery.
- Work performed strictly within the construction site.
- Strict prohibition of vehicle washing and refuelling outside of the specially equipped places.
- Construction activities will be regularly inspected on site by the Project Company.
- In order to prevent direct or indirect impacts on stream beds, no intervention will be made to the bed sections of the streams in the vicinity of the Project area, bed sections will not be narrowed, and activities will not be carried out to disrupt the flow regimes.
- Within the scope of the Project, if a water source is encountered in the vicinity of the turbine sites and switchyard, the relevant institution will be contacted, and no destruction and construction activities will be carried out in the water source and the area feeding the source.
- No waste material, solid or liquid, will be poured into the existing stream beds in the vicinity of the Project area including ones with seasonal flowing, their cross-sections will not be narrowed, the existing and cadastral width of the stream beds will be preserved,
- Additionally, a groundwater quality and groundwater table monitoring regime should be implemented regularly during the construction phase. It is recommended that water is sampled from the groundwater wells and springs around the Project site in 1 km distance from the boundary.
- Construction vehicles should only use the designated roads to prevent any harm or alteration on the agricultural drainage channels.

The Project Company has informed that communication with Mukhtar during the construction activities regarding the safeguard of the water source will be ensured.

Although the likelihood of the impacts will be greatly reduced with the application of mitigation, sensitivity of the receptors does not change. However, the application of mitigation including best practice measures means that the impact of spillages, leaks and pollution is reduced to negligible. As this mitigation would remove the likely risk of an incident occurring that could affect water resources, any major spillages would be considered an emergency which would require implementation of the emergency spill response measures.

3.4 Land Use, Soil and Geology

The Project's area of influence is defined by considering northern section of the Project area where the wind turbines are planned to be located. This includes the planned locations for wind turbines, the access road, and the route for the ETL. Additionally, a 1 km protective area has been established around this area.

The baseline conditions regarding land use, soil and geology are shared below for the Project area:

- No built area within area of influence except for the substation located where the ETL is connected.
- Industrial and commercial activities are identified to be located far away from the footprint of the Project Area.
- It shall be noted that a few villages located around the area of influence is determined.
- On 15 June 2023, local community members filed a case to annul the National EIA Positive decision for a project, which was approved on April 3, 2023. Experts conducted a discovery on July 6, 2023, and submitted their opinion report on November 11, 2023. In response to the ongoing lawsuit, the Project Company shared new documents on May 2, 2024, detailing additional studies to address the objections. These reports include Ecosystem Assessment Report, Forestry Assessment Report, Agricultural Survey Report, Bat Survey Report, Research on Pollinator Insects.
- The Project Company plans to incorporate these studies into the National EIA to seek new approval, with an expected decision in June 2024. For more details, see Chapter 12: Biodiversity.
- Key points from the "Forestry Assessment Report": Soil erosion can be prevented by safely storing mineral soils and taking precautions after tree cutting. The area is fire-prone, so road construction should be coordinated with forestry authorities. There are no unique geological features in the project area.
- Key points from the "Agricultural Survey Report": Construction involves turbine installation and road opening. Topsoil from excavation should be stored properly, and soil conservation is crucial. A soil protection project should be prepared before starting excavation. The area includes dense olive plantations and land classified as V, VI, and VII below 1000 meters altitude. Care should be taken to avoid damaging olive trees during construction. The impact on class VI agricultural land is minimal and manageable. If the recommended measures are followed, the project is not expected to have long-term negative effects on agricultural lands in the region.

The following aspects are considered in land use, soil and geology have potential to take place during the construction phase of the Project:

Land loss: most of the Project area has land use capability which restriction on the productivity and utilization of agriculture is suggested. In the land preparation phase of the Project, land loss is anticipated due to earthworks to prepare the land for turbine foundations and the site and access roads. Since there is a limited land use capabilities in the area, it is not anticipated that land loss would be significant. Total footprint of the Project area is 219,632 m².

Soil integrity: Topsoil stripping activities during the site preparation and accidental spills could be raised during the implementation of the Project could affect adversely to soil integrity.

Topsoil loss: Topsoil stripping will be carried out during the site preparation could cause in soil degradation and loss of fertile layers. This leads to impact the ecosystem's ability to support vegetation and wildlife adversely.

Soil erosion: The National EIA Report gathered information about the land in the area of influence considering its use and condition. It is yielded that all of the turbine locations are located on areas with low or very low erosion risk areas. The construction activities that could contribute to soil erosion include ground surface disturbance during the installation of access roads, wind turbines, disturbing soil stability due to heavy equipment traffic and surface runoff pattern disturbance by diverting natural drainage into new areas and locally increasing runoff volume.

Soil contamination: Construction equipment would need to be refuelled and some hazardous materials or wastes (such as waste paints and degreasing agents) may be generated. Accidental fuel spills or releases of hazardous materials could result in the exposure of vegetation at the project site, and reestablishment of the vegetation may be impacted or delayed because of residual soil contamination. However, after expected hazardous materials handling and refuelling requirements were met, only small spills or releases would be anticipated, if any.

Seismicity/Stability of structures: The National EIA Report gathered information about that the Project area is located in 1st Degree Earthquake Zone (1st degree being the highest risk and 5th degree being the lowest risk).

Potential geological hazards: Landslides, rock falls and earthquakes could affect the construction and operation of the Project area. If site construction activities were not conducted properly, they could destabilize slopes leading to increase destabilization risk of soil.

Mitigation Measures

Specific mitigation measures to avoid and/or mitigate the potential impacts on land use, soil and geology during construction phase will need to include the following:

- The impacts on land use will be mitigated by adopting a hierarchical approach, beginning with avoidance and minimisation strategies. Turbine locations had been already selected by considering land use capability in design process, so majority impacts had been avoided in design process. In the design of access and side roads, existing terrain contours will be considered to minimise land clearance requirements includes avoidance of sensitive areas and utilizing existing infrastructure where possible.
- The soil disturbed areas will undergo restoration in accordance with the "Biodiversity Management Plan" which includes reinstating topsoil, reseeded with native vegetation.
- Restoring ecological functions of the land by developing and implementing "Erosion Control Management Plan"
- Stripped topsoil will be stored within the Project area in accordance with requirements specified in the relevant national legislation.
- After topsoil stripping, filling will be carried out immediately and stockpiling of the topsoil be carried out.
- The several management and mitigation techniques will be used in the event that soil contamination occurs of which include releasing of substances into soil that could contaminate it will be prevented, "Emergency Preparedness and Response Plan" will be developed and implemented. Mitigation measures in Waste and Wastewater Management Plan and Emergency Preparedness and Response Plan will be applied in case of hazardous spills (e.g. during the refuelling procedure).
- The several erosion control methods will be applied. The vegetative cover with the native grasses, shrubs, and trees helps stabilizing the soil, will be planted reducing the risk of

erosion. The erosion control blankets or mats will be employed on slopes to provide immediate protection and support the growth of vegetation. Sediment basins and silt fences will be implemented to trap sediment-laden runoff and prevent it reaching vulnerable areas. Regular monitoring and maintenance of erosion control measures will be implemented.

- Visual observation will be carried out and database of AFAD's latest earthquakes list⁸ will be controlled regularly to detect changes in soil conditions, subsurface stability, and potential seismic activity. Adaptive management strategies will be employed to adjust mitigation measures in response to monitoring results.
- In addition, the requirements identified in Erosion Control Management Plan Including Drainage and Sediment Management Procedure for the Construction and Operation Phases will be followed.

Residual impact significance is negligible to major for the impact categories of Land use, soil and geology.

3.5 Air Quality

Several factors have been evaluated to determine area that could be affected by the emissions due to Project activities. In this context, following evaluations have been made to determine Aol:

- The distribution of the emission sources,
- The land uses and intensities of sensitive receiver types, and
- Regulations and guidelines.

Another criterion to determine Aol is Turkish Regulation on the Control of Air Pollution Originating from Industry (RCAPOI). The impact area defined in the RCAPOI for the modelling study suggests an area should be taken as square-shaped area with a side length of two km which is the minimum Aol.

Within the scope of the Project, emissions from point, areal, and linear sources arising from road and turbine construction activities are distributed heterogeneously in the field. Hence, examination areas have been established by separately evaluating each emission source based on its type.

Additionally, Project specific baseline monitoring has been undertaken to support the assessment. The study area includes various sensitive receptors such as settlements, forest lands, and agricultural lands.

Air quality measurements were conducted for the particulate matters (PM₁₀ and PM_{2.5}) at 3 locations which are determined to represent the receptors such as residential areas and agricultural lands, around the Project area.

It is observed that both PM₁₀ and PM_{2.5} values comply with both national and EU limit values. When the values at the four measurement points are evaluated, it is concluded that the total impact significance is insignificant for all measurement points. Although overall air quality impacts by the project activities are insignificant, the following mitigation measures will be taken into account to avoid potential impacts and mitigate those that do occur.

During the construction phase of the Project, dust emission will occur due to excavation activities and movements of construction machinery. Secondly, exhaust emissions from the engines of the vehicles will occur. Impact significances are found as insignificant for PM₁₀ and PM_{2.5} parameters.

⁸ AFAD's list of latest earthquakes (URL: <https://deprem.afad.gov.tr/last-earthquakes>)

Mitigation Measures

The World Bank Group (WBG) General EHS Guidelines document was used for air emission abatement techniques concerning to the construction phase. Specific mitigation measures to avoid and/or mitigate the potential impacts ambient air quality during construction phase will need to include the following:

- All the provisions provided in Air Quality Management Plan will be complied with.
- Community grievances regarding air quality including air emissions and dust generation will be collected through Community Grievance Mechanism established as part of Stakeholder Engagement Plan (SEP) and will be addressed by the Project Company.
- Any unnecessary soil moving/clearing will be avoided to minimize dust.
- All vehicles will undergo regular maintenance according to the manufacturer's recommended intervals and individual maintenance schedules will be created for each vehicle.
- Operators will be trained to take appropriate action in case of abnormal events (e.g., black smoke emission).
- Vehicles will be turned off when idling is necessary, provided that the ambient temperature is above 0°C. For ambient temperatures below 0°C, vehicles will be turned off if the idling time exceeds 5 minutes. Exceptions to this rule may apply in emergency situations, for occupational health and safety reasons, or due to traffic conditions. Operators will be informed about these exceptions during their training.
- Drivers will be instructed about the importance of adhering to speed limits and smooth acceleration to minimize fuel consumption and emissions.
- All piling of materials/soils will be stabilized in a manner that minimizes the occurrence of dust by wetting the top layer. Seeding will also be applied, if necessary, so that vegetation will prevent wind erosion.
- Any loose material that could produce dust when travelling will be covered and/or maintained appropriate freeboard (+0.3m) on trucks or vessels hauling.
- Stockpiles will be inspected regularly.
- Excessive vehicular movement will be avoided.
- If necessary, haul roads and areas of hard standing of excessive dust will be cleaned.
- Covers and/or control equipment can be used to minimize dust from material handling.
- Vehicles will be kept clean, so that no dirt is carried on the vehicles into and out of the area. Wheel washing will be done for all construction vehicles prior to exiting the construction site.
- Stockpiling of stripped surface material, e.g. rock, sand and soil, stockpiling of unwashed materials, will be limited.
- Design of stockpiles will be optimized to maintain a low profile without a sharp change in shapes.
- Good practice will be applied for selection of Project vehicles that meet the latest emission standards (e.g. EURO 5 or US EPA Tier 2 emission standards) and maintained in a reasonable working order.
- Emissions from road and off-road vehicles must comply with national or regional programs.
- A 24-hour monitoring study for PM₁₀ and PM_{2.5} parameters will be conducted once every quarter to determine the impact of the works on air quality and the effectiveness of emission control measures, as specified in the Air Quality Management Plan.

3.6 Climate Change and Greenhouse Gas (GHG) Emissions

3.6.1 Climate Change

To identify physical climate change risks to the Project receptors (i.e., physical, social, and environmental receptors) during construction and operation phases, the following methodology have been used:

- The climate change scenarios including the evaluation of the current baseline scenario and future climate change projections have been constructed based on SSP1-2.6, SSP2-4.5, and SSP5-8.5 climate change scenarios both for the mid-future (2040-2059) and the far-future (2060-2079) considering the Project lifetime have been developed.
- A qualitative risk assessment for each vulnerability through consideration of the likelihood of climate impacts and severity of the impact have been performed.
- Embedded mitigation actions (i.e., mitigation actions incorporated into the Project design) and potential mitigating actions for identified risks have been reviewed.

Impacts and Mitigation Measures

The projected climate indicates warmer winters with reduced precipitation and hotter, drier summers, posing increased risks of drought and high temperatures. The impacts during construction and operation phases include damage to physical, environmental, and social receptors due to high temperatures, wildfires, flooding, and extreme weather events (including storms, high winds and rainfalls, etc.).

Based on identified climate hazards, climate impacts and mitigating actions have been determined for construction and operation phases. A summary of climate impacts and mitigation actions identified for construction and operation phases has been provided below:

Construction phase

Due to high temperatures,

- The engines of construction equipment and machinery can overheat. To mitigate the risk, construction equipment and machinery will be inspected regularly, cleaned to prevent dust accumulation, shutdown when they are not used, and stored away from the direct influence of sunlight.
- Office / welfare facilities can overheat. To mitigate the risk, office / welfare facilities will be equipped with proper air conditioning system.
- Workers may have heatstroke. To mitigate the risk, air-conditioned areas, proper Personal Protective Equipment (PPE), and training to raise awareness of heat-related stress symptoms will be provided to workers,

Due to drought,

- Stockpiles of materials and soil can dry out, leading to more dust on the site. To mitigate the risk, measures will be considered in stockpile design for the prevention of dust generation and runoff (e.g., avoiding steep angles), a dust suppression system will be available on the site, and the air quality on the site will be monitored and reported regularly.

Due to high winds,

- Materials and soil can be blown away, leading to dust on the site. To mitigate the risk, windbreaks around material storage areas / soil stockpiles will be placed and a dust suppression system will be available on the site.

- Offices / welfare facilities may be damaged. To mitigate the risk, items such as partially installed decking, roofs, walls, etc. that might be dismantled or damaged by high winds will be supported.
- Unsafe working conditions can occur and lead to restrictions on working time or activities being carried out. To mitigate the risk, an Emergency Response Plan will be developed and implemented throughout the construction activities.

Due to intense rainfall,

- Materials and soil may runoff into watercourses, leading to pollution. Obtaining the necessary permits constitutes an embedded mitigating action. To further mitigate the risk, an Erosion Control Management Plan will be developed and implemented throughout the construction activities.
- The sites may be flooded and leads to restrictions on the operation of construction equipment and machinery on wet ground. To mitigate the risk, an Emergency Response Plan will be developed and implemented throughout the construction activities.

Operation phase

Due to high temperatures,

- Wind energy converters may fail and metallic or plastic components and joints of moving parts can expand. The inclusion of the SCADA system, which allows for ongoing controlling and monitoring of the system, and a cooling system for the components sensitive to high temperatures in the design are considered as embedded mitigating actions. To further mitigate the risk, mechanical and electrical components will be reviewed to confirm that temperature tolerances include projected temperature increases.
- Power storage and transmission within the substation and transformers may reduce. The same embedded mitigating actions described above applies, if relevant. To further mitigate the risk, adequate cooling or capacity for fitting additional cooling will be included.
- Cables may overheat and their energy transmission capacity may reduce. The same embedded mitigating actions described above applies, if relevant. To further mitigate the risk, wind energy converters and substation will be inspected and reviewed during and after heatwaves.

Due to wildfires,

- The infrastructure may significantly be damaged and there may be a significant health and safety risks to workers. The inclusion of fire protection and suppression system in the design is considered as an embedded mitigating action. To further mitigate the risk, an Emergency Response Plan will be developed and implemented throughout the construction activities.

Due to high winds,

- There might be increased wear and tear on wind turbine blades and infrastructure may significantly be damaged due to extreme high wind speeds, fallen trees. Designing the Project considering the high wind speeds typical for the site constitute an embedded mitigating action. To further mitigate the risk, weather data will be monitored, equipment & infrastructure will be inspected during and after extremes, and equipment will be upgraded in line with projected wind speeds for the lifetime of the Project.

Due to intense rainfall,

- There might be increased wear and tear on wind turbine blades and electrical equipment may damage. Coating blades with a polyurethane-based surface coating, which allows protection against erosion, constitutes an embedded mitigating action. To further mitigate the risk, weather data will be monitored, and equipment & infrastructure will be inspected during and after extremes.

3.6.2 GHG Emissions

Using the equation below, GHG emissions during construction and operation phases have been calculated based on publicly available emissions factor data for operating activities.

$$\text{Emissions (tCO}_2\text{e)} = \text{rate of activity (unit)} \times \text{emission factor (tCO}_2\text{e/unit)}$$

GHG emission sources arising from the construction of the Project include the following:

- Emissions due to construction activities
 - During the manufacture of materials to be used within the scope of each project,
 - During the transportation of materials to each project site,
 - During the construction / installation processes (including site preparation) associated with the following activities:
 - Electricity and fuel consumption by construction equipment and machinery
 - Electricity and fuel consumption during the worker’s access to and from the site,
 - On-site waste production,
 - Maintenance activities,
 - Land use change

GHG emission sources arising from the Project operations include the following:

- Emissions due to;
 - Fuel consumption associated with the use of on-site generators,
 - Fuel consumption associated with maintenance and repair activities,

Electricity consumption for lighting and security purposes (e.g., operating security systems, CCTV, etc.) when climate conditions (i.e., the wind speed) are not suitable for operating activities.

GHG Emissions Assessment

Construction phase

Based on the methodology provided above, construction-related GHG emissions have been assessed and presented below.

Table 3.1: Project emissions by scope

Scope	tCO ₂ e	% of total
Scope 1	1,600	3.86%
Scope 2	60	0.14%
Scope 3	39,740	95.99%
Total	41,400	100%

The construction period of the Project was 13 months. Therefore, total Scope 1 and Scope 2 emissions arising from the construction phase are 1,520 tCO₂e per year, which is below the threshold value (25,000 tCO₂e/year) as per the IFC guidance. Construction emissions are also below 5% of the lifetime emissions avoided through this renewable energy development, therefore, the Project is compliant with the EBRD guideline.

According to the assessment of construction-related GHG emissions, the most five emitting components / activities of the Project are blades (30% of the total emissions), tower (18% of total emissions), material transport to the site (13% of the total), turbine hub (8% of the total), and bearing system (6% of the total).

Emissions related to vegetation loss and the loss of sequestration potential have been calculated separately since they are not direct construction related emissions. Assessment results are presented below.

Table 3.2: Project specific land-use change emissions by scope

Scope	tCO ₂ e / year	tCO ₂
Scope 1	130*	1,910**
Scope 2	0	0
Scope 3	0	0

*Annual estimated loss of forestry sequestration potential
 **Total estimated vegetation (tree) loss emissions

Operation phase

Potential carbon sources during the operation phase of the Project will include emissions due to:

- Fuel consumption associated with on-site generators,
- Fuel consumption associated with maintenance and repair activities,
- Electricity consumption for lighting and security purposes (e.g., operating security systems, CCTV, etc.) when climate conditions (i.e., the wind speed) are not suitable for operating activities.

Calculations have not been made due to lack of data on consumptions at this stage of the Project. However, no significant operational GHG emissions is anticipated due to the nature of the Project.

Additionally, the Project results in an emission reduction thanks to its nature (i.e., a renewable energy investment). According to the methodology outlined above, avoided GHG emissions compared to typical grid generation emissions have been calculated as 116,784 tCO₂e/year.

Mitigation Measures

Construction phase

Based on the assessment of construction related GHG emissions provided above and considering mainly the components / activities emitting the most GHG emissions, the following measures have been identified to minimise these sources of GHG emissions as far as possible:

- Implementation of appropriate waste management during construction works, adhering to the Waste Management Hierarchy to avoid and/or minimize on-site waste generation,
- Sourcing construction materials locally where possible to minimise the amount of construction traffic movements,
- Minimizing construction related transport impact through enhancement of transportation of construction materials and construction workers,
- Where possible, preferring materials with low carbon footprint in the design.
- Design optimisation to minimise the quantities of new raw materials required, for example by limited haul road widths, optimising design of foundations for turbines, etc.
- Establishing sustainable construction management practices to optimise energy efficiency measures during construction site work activities, including:
 - Toolbox talks for workers about switching off plant and construction equipment and machinery when not in use;
 - The use of energy zoning in construction site cabins to control energy usage; and
 - Regular servicing of plant and diesel-powered construction equipment and machinery.

Operation phase

There is no anticipated significant GHG emissions arising from the operation of the Project considering the nature of the Project (i.e., a renewable energy investment). Therefore, no further action is anticipated.

Renewable energy investments produce energy without emitting carbon emissions. In other words, renewable energy projects avoid the release of carbon emissions that would be occurred if a fossil-fuel based technology was used to produce energy. The Project results in an emission reduction of 116,784 tCO₂e per year. This is equal to approximately 0.02% of the country's annual emissions in 2020 year.

3.7 Noise and Vibration

The Project's Aol for noise impact is determined with the consideration of elevation and horizontal distance differences from the potential noise sources to receptors. 500 m distance was used for the Aol. Accordingly, baseline noise measurements were conducted at the potentially impacted settlements and noise model was prepared to cover potential impact zones.

The specific objectives of the impact assessment are to:

- Identify the main sources of potential impacts to ambient noise and vibration from Project activities during construction and operation phases,
- Assess noise and vibration impacts on sensitive receptors in the vicinity of Project area,
- Suggest mitigation measures and determine the residual impacts.

Potential sources of noise and vibration can be outlined as:

- Noise generated by construction works.
- Noise generated from earth-moving truck activities on road route during the construction period.
- Vibration caused by construction activities.
- Noise generated turbine activities for operation phase.

In order to evaluate the significance of impact from the Project, magnitude of impact and sensitivity of the receptors have been identified throughout the Project area. Magnitude of impact is a parameter defined as characteristics of impact and the Project. On the other hand, responsivity defined as characteristics of receptors.

Measurements were carried out at three locations which were selected as the closest residential areas to the Project area. During the measurement period, ISO 1996-2 Standard was followed and IEC 61672 – 1 type 1 sound level meters were used. Measurements were conducted for 48 hours. A noise model was developed using commercial noise modelling software CadnaA from Datakustik. Meteorological data (average relative humidity, average temperature, wind frequencies) were included in the noise mapping software to calculate the most suitable sound propagation conditions.

Construction noise

Satellite view of the assessment points are presented in Figure below.

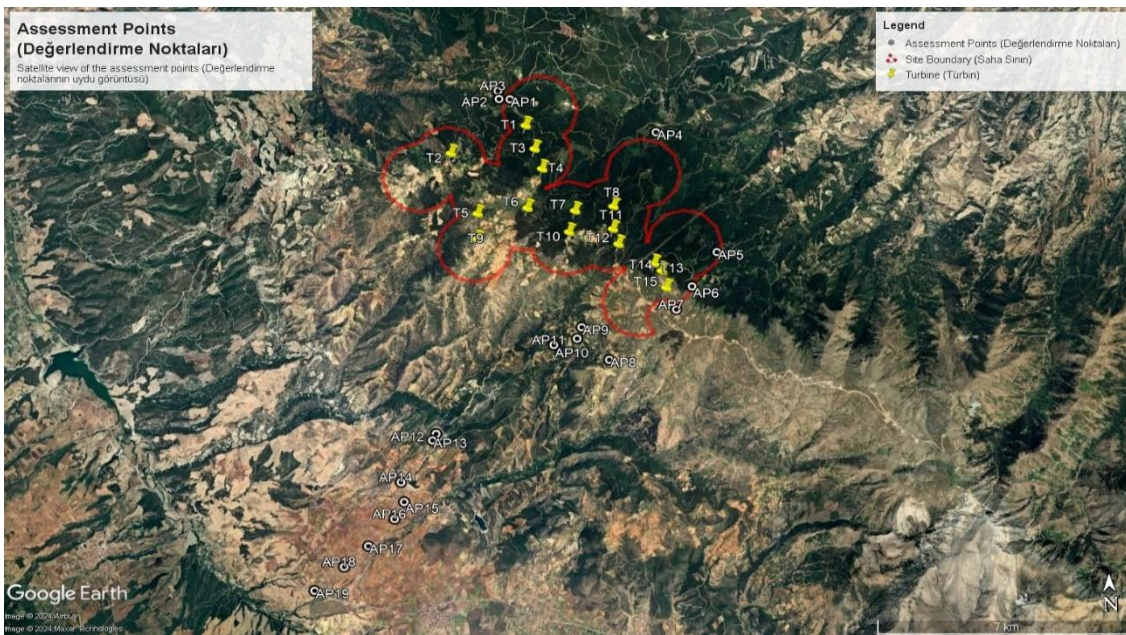


Figure 3.1: Satellite View of the Assessment Points

The importance of the receptor and the sensitivity of the receptor to the effect determines the damage that the effect will cause to the receiving environment in a given spectrum. This effect is rated in a matrix from 'Negligible' to "Major". Regarding the construction phase of the Project; there is three Major (AP 15, AP16, AP 19), one "Moderate" (AP 17), one "Negligible"(AP 18) and 11 "No Impact" final impact significance measurement results in accordance with IFC limits for 19 assessment points without mitigation .

Operation noise

Regarding the operation phase of the Project; all final impact significances were found to result in "No Impact" in accordance with both national and IFC limits for 19 receiver locations.

Construction vibration

Vibration analyses were conducted for construction phase. There is no vibration impact expected for operation phase of the Project. Vibration during the construction stage is mostly caused by earthworks. It was assumed that machinery that have maximum vibration impact, will work at the closest construction area to receiving location. Thus, the worst-case scenario was studied.

All final impact significances were found to result in "No Impact" in accordance with RENC regarding the vibration due to construction phase.

Operation vibration

There is no vibration impact expected for operation phase of the Project.

Mitigation Measures

The Project will seek compliance with international guidelines and national legislation regarding prevention and control of noise and vibrations during construction. Following measures could be taken to mitigate any impact.

- Earth-moving and noisy equipment will be kept as far away from sensitive areas as feasible on the construction site.

- Activities that cause noise and vibration will be spread over time as much as possible so that multiple activities that generate noise and vibration do not occur at the same time and their cumulative impacts are mitigated.
- Baseline noise will be taken into account when construction activities are planned. At low baseline noise regions, hours and at the weekends, truck activities will be limited as much as possible and low noise generating activities will be scheduled.
- Construction impacts detected are directly related with truck routes. Truck access routes can be altered at impacted zones.
- Site-specific measures could be implemented. (i.e. extra speed limits at impacted zones).
- Construction workers will be trained on relevant management plans and be aware of the sensitive nature of workplaces they are operating in and advised to limit verbal noise or other forms of noise.
- Noise and vibration will be minimized at the Project area and surrounding areas through instructing construction truck drivers to switch off vehicle engines while offloading materials and to shut down or throttled down to a minimum when not in operation.
- Local communities will be engaged to minimize any disturbance and effect on the safety, health of people in the nearby buildings.
- Complaints on noise and vibration disturbances will be recorded, assessed and necessary preventive measures will be taken.
- Mitigation measures specified in Noise Management Plan will be implemented.

Considering detected impact is sourced from truck passages, no residual impacts are expected. Following the end of construction works source will be removed.

In terms of both operational noise and vibration there is no significant impact detected at any of the assessment points. Thus, there is no need for mitigation measures and no residual impacts are expected in terms of the operation phase.

3.8 Landscape and Visual

Modelling studies were undertaken to analyse shadow flicker impact and zones of turbine visibility. An analysis of landscape and visual baseline conditions were undertaken to inform the assessment of change and resulting significant effect. All wind turbines within the scope of Project have been considered. The anticipated activities at each receiver are modelled using the WindPRO 4.0 software. Shadow impacts were assessed in line with “IFC Environmental, EHS Guidelines for Wind Energy” document.

The proposed WPP will consist of 15 wind turbines with a hub height of 96m and turbine tip height of up to 165m. Proposed ancillary assets include access roads and a 154 kV single-circuit transmission line of approximately 12.5 km for connection to Denizli Transformer Substation, which is currently operated by the TEIAS. Further information regarding the scheme description is presented in *Chapter 2: Project Description*.

The Project’s AOI for the assessment of landscape and visual effects was determined by the outputs of the zone of visual influence (ZVI) modelled for the project, along with field studies undertaken by local consultants in country. The ZVI and site visits determined an initial study area of 20 km for the assessment of landscape and visual effects.

A digital ZVI has helped to inform the identification of visual receptors (those who would have a view of the proposed development) and a selection of corresponding representative viewpoints. A ZVI is a computer-generated model which illustrates the areas from which the project could theoretically be visible from a viewer height of 2m. A ZVI based on the operational project has been produced for this assessment. The ZVI has been modelled in ESRI’s ArcGIS Pro Geographical Information System (GIS) using 25m resolution topographical data from Airbus.

The ZVI is based on bare ground data, with any ridgelines, plateaux and valleys reflected in the extent of predicted visibility. Existing vegetation including forestry is therefore not accounted for in the ZVI and presents a worst-case scenario. The ZVI assumes a maximum 150m tip height above ground level.

According to studies conducted by United States Department of the Interior Bureau of Land Management about wind turbine visibility, maximum theoretical visibility of wind turbines varies between 16-58 kilometres. However same document states that; dominant landscape impact is limited to 4-8 kilometres according to hub heights. Since visual impact assessment is based on landscape alteration, area of influence for visual impact is 8 km radius from turbines.

- Visual Impacts, Zones of Visibility
 - In order to make a complete visibility assessment for the Project, the visibility of each turbine is calculated and mapped for identified receivers.
- Turbine information
 - Information related to the turbines to be used in the Project
- Modelling factors
 - The attenuation factors used in this study are: The sunshine/cloudiness data of the project region and the topography of the Project area.

During field trips and spatial surveys landscape identification conducted for current situation around planned facility site. In terms of current landscape followings are noted;

- The field is mostly consists of rural and forest villages.
- The terrain is mostly forests and rocky mountainous areas.
- As a consequence of the hilly terrain, very close distances can be shadowed by terrain fluctuations.
- When accounting for the lack of designations within the study area, and accounting for the low level of development in this vast mountainous landscape, the sensitivity is considered to be medium.
- No recognized recreational viewpoints, United Nations Educational, Scientific, and Cultural Organisation (UNESCO) sites, or specific landscape designations.

Considering the lack of designations and the low development level, the area's sensitivity is considered medium.

Zones of Visibility

As a matter of fact, that turbines located at a very close distance to the rural households considering average height of the rural houses and average height of the turbines. Nonetheless, considering turbine distances to the households (being very distant), 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 found out to be Negligible to Minor. Below Figure shows turbine visibility assessment via wireline analysis. The wireline analysis has been undertaken without the benefit of corresponding photography, using bare earth data only. Wirelines have been produced using Resoft WindFarm software and 25m resolution terrain data from Airbus. All wireline images show a field of view of 90 degrees, which is broadly consistent with that of human eyes. An example of wireline image is provided in Figure 3.2.

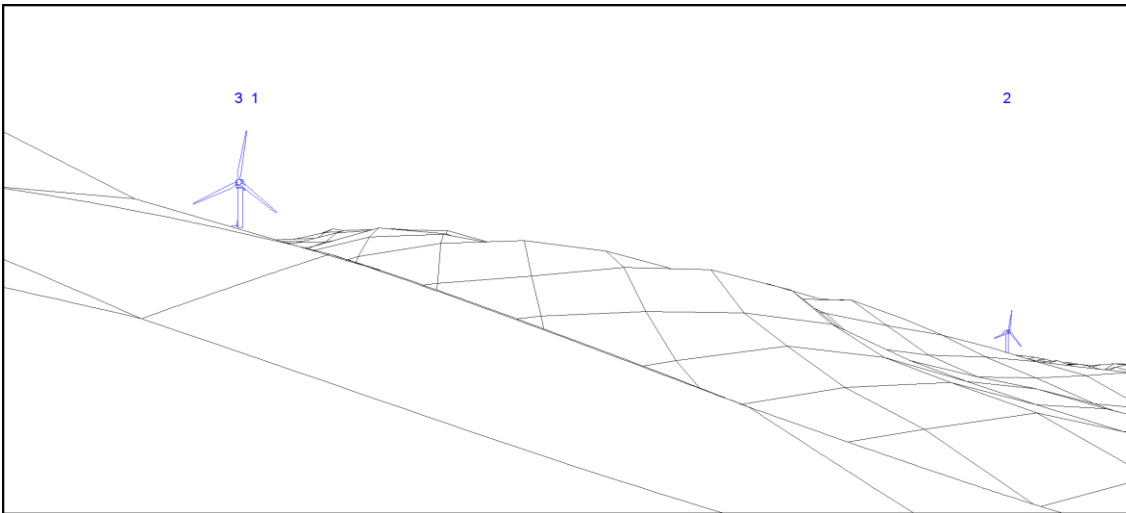


Figure 3.2: Assessment Point 1 (AP1) Proposed Wireline during Operation. View direction to Site Centre: 188.1°; Coordinates X: 652,684; Y: 4,190,083; Pitch: 10°

Assessment of landscape and visual effects

Temporary landscape and visual effects, during construction, would be minimised through measures within the Environmental and Social Management Plan. Overall, considering the nature of construction activities, particularly their transient characteristics, the magnitude of landscape impact is considered to be low to minor to moderate, and, taking into account the medium landscape sensitivity that has been identified, the overall significance of landscape effect during construction is considered to be minor moderate.

In terms of operation, the WPP design is responsive to the simple, mountainous landscape in which it would be located, by avoiding considerable variations in the height and spacing of turbines, avoiding multiple occurrences of overlapping turbines on ridgelines and through careful alignment of the access road. The overall significance of landscape effect during operation is considered to be negligible to minor. In addition, WPP design is responsive to existing views from the representative visual receptor locations identified by avoiding considerable variations in the height and spacing of turbines, avoiding multiple occurrences of overlapping turbines on ridgelines, and through careful alignment of the access road. The overall significance of visual effect during operation is considered to be negligible to minor.

Mitigation Measures

Regarding the landscape visual impact negligible to minor impacts detected.

3.9 Shadow Flicker

The Project's Aol for the shadow flicker impact was determined as the area where shadow generated by the Project reaches out the receptors. As such, the Aol for the shadow impact was determined as sensitive residential areas located at nearest settlements. Shadow impacts were assessed in line with "IFC Environmental, EHS Guidelines for Wind Energy" document.

Although an unlikely case, it's standard practice to evaluate the shadow flicker in a "worst-case" scenario. Moreover, the shadow flicker intensity is not considered. Thus, even if the shadow is too weak to be observable, the period of flicker will be recorded. The worst-case scenario considers that:

- The sun is shining all day with no disturbance from clouds or fog;
- The sun rays, the turbine rotor and the windows are in the same line-of-sight all day long;
- The wind is blowing all day, which means that wind turbines are always operating;

- The dwelling is composed only of windows (like a greenhouse);
- There is no light obstruction from obstacles (existing turbines, trees, other buildings, etc.);
- There is no light obstruction from topography;

In order to gather more realistic results, real case scenario is also considered and simulated for the Project. Following sub-topics have been considered in order to create a real case scenario:

- Factors which may alter the occurrence of shadow
 - The sunshine/cloudiness data of the project region
 - The wind data of the project region, allowing to consider the real direction of the turbine rotor and the period when the turbine doesn't rotate
 - The presence of obstacles like existing wind turbines, trees or buildings
 - The topography of the site which could create a natural shadow
 - The external configuration of the dwellings (direction of building faces, number and size of the windows)
 - The internal configuration of the dwellings (size and location of the rooms)
 - The physical obstacles inside the dwellings (curtains, blinds...)

To assess possible impacts of a shadow flicker, an AoI has been identified according to the rotor diameter (which is 138.6 m). The AoI has been determined as **10 X Rotor Diameter** distance from turbines, curtailed to 130 degrees either side of North (so 260 degrees in total, leaving 130 degrees south of turbines where shadow effects are not expected). 19 assessment points have been identified in and around the identified AoIs (Figure 3.3).

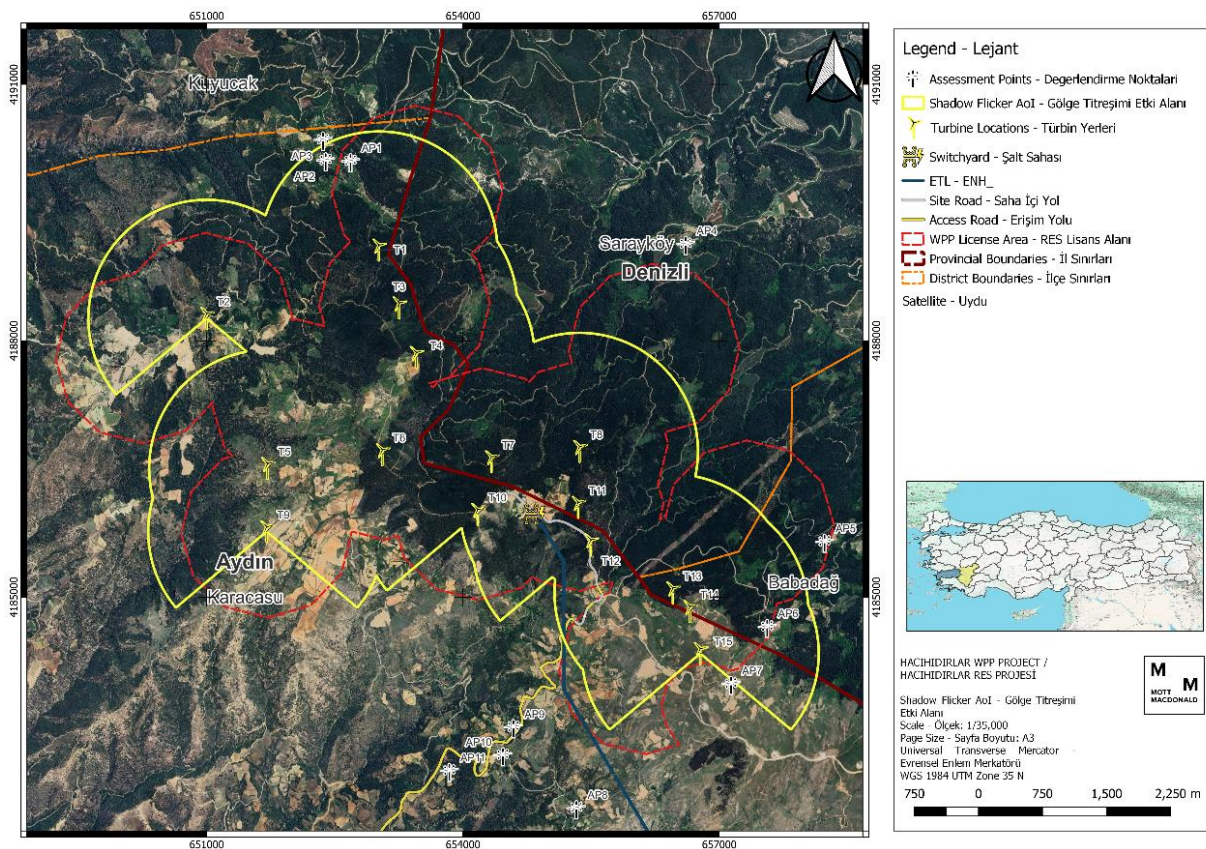


Figure 3.3: Shadow Flicker AoI ($\theta=260^\circ$)

Mitigation Measures

In terms of shadow flicker no impacts detected at identified receptors. Thus, no residual impact expected, and no mitigation measures considered.

3.10 Waste and Resources

The area of influence includes the Project licence area, and its scope may extend to surrounding areas where potential impacts associated with resource utilization and waste generation are assessed.

The baseline conditions regarding waste and resources are shared below for the Project:

- Environmental considerations were taken into account during product selection in the design phase of the Project to minimise waste generation and prioritize recyclable materials. In addition, sustainable procurement practices were implemented to reduce waste and ensure responsible supplier selection. Procurement and Local Content Procedure will be applied.
- Electricity will be supplied from the national grid or diesel generators.
- Drinking water will be supplied from dispenser size bottled water, for which the emptied bottles will be collected as recycling materials and sent to licensed companies. Groundwater use is not permitted unless authorised by State Hydraulic Works.
- Utility water will be supplied from licensed contractors via water trucks with careful monitoring to avoid exceeding permitted use.
- The sanitary wastewater will be collected in septic tanks and transported to licensed wastewater treatment plants for processing.
- Municipal waste generated by the Project will be collected and disposed of by relevant municipalities in Aydın and Denizli provinces.
- There are two municipal sanitary landfills in Kumkısıık and Tavas districts of Denizli. In addition, a municipal sanitary landfill is planned to be constructed in Çivril district of Denizli.
- There is one licensed excavated soil disposal area namely Akça Hazır Beton in Merkezefendi district of Denizli.
- There are three municipal sanitary landfills in Efeler, Kuşadası and Didim districts of Aydın.
- There are seven licensed excavated soil disposal areas in Aydın and two licensed recycling facilities for construction and demolition waste, those locations and capacities are not specified.
- During construction, topsoil will be stored for reinstatement, excavated materials will undergo on-site treatment or disposal in licensed areas. Ready-mixed concrete and aggregate will be supplied from certified manufacturers and delivered to the Project area as needed without establishing a batching plant on-site.
- Waste including hazardous waste will be managed locally without the need for trans-boundary disposal.
- During excavation process in the construction phase of the Project, the soil other than topsoil, which is excavation soil, resulting from the soil loosening activities sized to be reused. The excavation soil will be temporarily stored at turbine platforms to be used for structural filling the Project area. If reuse of the excavation soil is not feasible due to either, it is not suitable for reuse on-site (excavation waste) or more material is excavated from the Project area than is needed for structural filling (excessive excavation soil), these materials will be stored temporarily in designated non-forest storage areas in the Project licensed area and the additionally bought agricultural land parcels subject to land acquisition onsite. According to the information shared by the Project Company, these lands will be bought on willing seller and willing buyer basis and any physical or economic displacement was not required. Negotiated settlement and expropriation processes are followed within the land

acquisitions made within the scope of the Project. However, the economic displacement process has been also evaluated in the Livelihood Restoration Plan (LRP) prepared in the Resettlement Action Plan (RAP) and PAPs whose livelihoods has been damaged will be compensated with appropriate corrective actions. Also, land acquisitions continue in the remaining parcels. The RAP prepared in this process will be followed and landowners will be approached within the scope of this plan.

- If there are no proper number of the agricultural lands to be bought for temporary excavation waste storage, available lands will be identified with engagement of the relevant forestry directorate. The lands, where no trees are present and can be considered as hollow areas, will be filled with mutual agreement with the relevant forestry directorate. For these areas permits from DSI and Provincial Directorate of Forestry and Agriculture will be granted. Unless granting necessary permits including non-agricultural use permit for the temporary use of the bought land areas, the excavation waste will not be stored in these lands. In addition to the bought/to be bought agricultural lands in the Project licensed area, there may be need to acquire additional agricultural lands off the Project licensed area. For the agricultural lands to be bought offsite, the same actions identified for the agricultural lands bought/to be bought onsite are required to be followed during the acquisition and use of these lands. It is to be noted that the Project Company shared that the remedy of the non-agricultural use of the lands is planned in order to protect the soil and sustain the natural function of the lands. In the rehabilitation of the lands, the proper technical measures will be taken in accordance with the Regulation on the Control of Excavation Soil, Construction and Demolition Wastes (Official Gazette Date/Number: 18.03.2004/25406). The Project Company plans to complete temporary storage for transferring excavation waste to licensed disposal facilities after the Commercial Operation Date. Then, excavation waste will be transported to the licensed excavation waste disposal facilities located in the Denizli and Aydın. The necessary communications and official correspondences will be conducted with the authorities of the Environment, Urbanization and Climate Change Provincial Directorates of Denizli and Aydın. Following relevant directions from the authorities, the tendering procedure for transferring, disposing, and storing the excavation waste will be implemented. The potential community health and safety risks on the air quality, noise, erosion, water source protection, habitat and livelihood impacts associated with the transfer of the excavation waste, temporary storage of the excavation waste into agricultural areas to be bought, final disposal of the excavation waste to the licensed excavation waste disposal facilities and corresponding mitigation measures will be assessed separately in the Community Health and Safety plan. In every action taken regarding the excavation waste management, the Regulation on the Control of Excavation Soil, Construction and Demolition Wastes (Official Gazette Date/Number: 18.03.2004/25406) will be adhered ensuring the environment and human health and safety.
- Wastewater will be managed by existing wastewater treatment plants in Aydın and Denizli provinces with septic tanks emptied reaching its capacity and disposed to local treatment plants.

The following aspects are considered resource and waste management have potential to take place:

Soil and groundwater contamination due to poor waste management: The transportation of the materials and equipment may increase traffic and pose risks of soil and water contamination from the spills.

Life and fire safety vulnerability due to not properly stored waste: Improperly stored waste materials can create hazardous conditions, increasing the likelihood of fire incidents. For instance, if flammable materials are not segregated or stored appropriately, they may ignite easily, potentially causing fires that endanger lives and property. Additionally, inadequate waste

storage could obstruct emergency evacuation routes, hindering the escape of individuals during a fire emergency.

Runoff from the exposed soil and concrete stockpiles: In the extreme weather conditions could lead to contaminated runoff from exposed soil and concrete stockpiles.

Increase in load on the capacity of existing waste recycling/landfilling facilities and wastewater treatment plants: In the construction and operation phases, various types of waste and wastewater will be generated which will potentially straining local waste management facilities and wastewater treatment plants.

Poor management of high-volume excavation waste due to insufficient storage conditions onsite and offsite: Excavation waste management presents challenges including finding suitable disposal areas and preventing improper storage that could lead to contamination and potential community health and safety risks including increased traffic load.

Mitigation Measures

Specific mitigation measures to avoid and/or mitigate the potential impacts on waste and resources will need to include the following:

- During the construction phase of the Project, several strategies are employed to minimize environmental impacts. These include sourcing materials locally to reduce transportation-related impacts, managing equipment energy consumption, and reusing excavation soil to the extent possible for levelling and landscaping. Waste and construction materials are disposed of in designated areas to minimize transportation impacts, and any necessary temporary storage areas require approval from relevant authorities. Measures are taken to separate excavation waste from demolition waste and topsoil.
- The excavation waste to be generated during the earthworks of the Project will be handled according to the Mitigation Hierarchy. With this regard, to avoid the generation of waste, the excavated material will be used as filling material on the access road as well as on turbine pads. The filling process will be carried out according to the suitability of the excavated material and limits of the final zoning planning permission (i.e. maximum permitted road width).
- The materials that cannot be used as filling material, which will be classified as excavated soil, will be managed in a way that does not harm the environment and human health in accordance with the Regulation on the Control of Excavation Soil, Construction and Demolition Wastes. Mitigation on Waste and Wastewater Management Plan and Community Health and Safety Management Plan will be implemented.
- During operation, an energy management program is implemented to monitor and optimize energy use, including passive efficiency measures like improved insulation and maximizing natural lighting and ventilation.
- Throughout both construction and operation phases, various mitigation measures ensure sustainable resource management. These include Waste and Wastewater Management Plans, responsible procurement practices described in Procurement and Local Content Procedure, substitution of hazardous materials, and efficient planning to minimize waste generation. Good housekeeping practices are also applied, such as inventory control to reduce waste from unused materials.
- For waste management, comprehensive Waste and Wastewater Management Plan is established, covering storage, training, collection, segregation, transportation, and disposal procedures. Hazardous waste is handled with care, and recycling facilities are utilized where applicable. Regular audits are conducted to ensure compliance and track waste generation trends. The proper waste management practices will be implemented including segregation, storage in designated areas, and adherence to fire safety regulations. Regular inspections

and training programs will be conducted to ensure compliance with safety protocols and minimize the risk of life and property loss due to fires caused by improperly stored waste.

- For wastewater management, regulations are followed for the design and construction of septic tanks, with plans in place to manage domestic wastewater onsite before discharge to local treatment plants, ensuring protection of both personnel health and the environment.
- The periodic desktop duty of care audits to inspect that all waste records/documentation of the Project and their contractors will be maintained in accordance with national requirements; and visiting the principal third party waste transfer and treatment/disposal sites utilised by the Project to verify Project waste is being managed responsibly will be considered in the monitoring actions in the Waste and Wastewater Management Plan.
- During the operation phase of the Project, the wind turbines, which cannot be reused, are required to be repaired or disposed of in case of any problem; they will be stored in the turbine platforms temporarily to be transferred to recycle or disposal facilities by the turbine manufacturer. The details regarding the management of waste wind turbine sections will be discussed in the decommissioning strategy and further evaluated in the detailed Decommissioning Plan.

There should be no residual significant effects of waste and resources after the implementation of appropriate mitigation measures.

3.11 Biodiversity

The investigation into the region's ecology aimed to define an "Ecologically Appropriate Area of Analysis" (EAAA) to determine the presence of features that may qualify for Critical Habitat. The EAAA was identified at a scale indirect area of influence of the Project area, considering large-scale ecological processes. This approach ensures that all potential risks within the Project footprint and surrounding vicinity are taken into consideration.

The EAAA was defined using a combination of water catchments, topographic information, and legally protected areas and/or internationally recognized areas of high biodiversity value information and similar habitat types. Species with a very specific distribution and ecological requirements were taken into account in defining the EAAA.

For the purposes of this CHA, the EAAA for flora and terrestrial fauna (amphibians, reptiles and non-bat mammals) was designated as the wider Akdag-Denizli Key Biodiversity Area borders.. The EAAA for flora and fauna encompasses an area of 1343 km². For EAAA for birds and bats, since the Project is not on a known major migratory route, the EAAA was based on the KBA borders again, but extended further to encompass the entire mountain ridge and the surrounding lowlands. The EAAA for birds and bats encompasses an area of 2092 km²

The baseline conditions regarding biodiversity are shared below for the Project:

- Due to time constraints, biodiversity surveys could not be done before completing the Draft ESIA study. On 01 November 2023, the biodiversity expert of the Consultant conducted a brief site visit. Due to the seasonality (autumn), the visit only provided an opportunity for general observations about habitat characteristics, especially for birds and bats. For the ecosystem services aspects of the ESIA, the use and functions of the flora/habitat was recorded. Information on the use of flora is provided by the field botanist, but interviews with local people were also carried out to validate the data. If some features were not observed by the Consultant during this visit, it does not necessarily indicate such features are not present and/or abundant. A one-year field monitoring programme has been established to resolve data gaps on biodiversity and inform for updating to Critical Habitat Assessment (CHA) accordingly. This monitoring methodology will focus on baseline of flora, birds, bats, mammals and herpetofauna.

- Within the scope of National EIA biodiversity chapters, several studies were conducted which provided the basis for the present ESIA. The flora and fauna survey for the examination of the Project area were carried out in April-May 2022. Ornithological surveys were conducted in 2021 autumn and 2022 spring migratory seasons in the Project area. Bat surveys were conducted in August 2021, September 202, for a total of 6 day/nights.
- Internationally and Nationally Recognized Areas: Hacıhıdırlar WPP, including its roads, switchyard and ETL, is located within Akdag – Denizli KBA, code EGE026, which consists of mountain ranges, valleys, and a part of Buyuk Menderes River, including the many streams that originate in the mountains and feed into the river, *Pinus* forests and alpine grassland. According to calculations conducted from forest stand data maps, a total of 12,565 trees are expected to be cut.
- Habitat and Flora: The study identified three natural habitat types in the Project Aol based on EUNIS level 3 classification, including *Pinus nigra* woodland and subalpine grasslands listed in Annex I of the EU Habitats Directive, with *Pinus nigra* woodland highlighted as a priority. A total of 164 plant taxa were identified, with the predominance of black-pine forest contributing to the scarcity of species. The uniformity in habitat types and vegetation cover is attributed to consistent bedrock and climate.
- Birds: The project area can support resident raptors like *Peregrine Falcons* and *Eurasian Kestrels* due to ample nesting sites, while its impact on nearby wetlands' avifauna, such as Buyuk Menderes Stream and Kokarhamam Marshes, is expected to be minimal, as these areas primarily attract waterfowl and shorebirds.
- Bat Surveys: The Project Aol is conducive to supporting various bat populations throughout different stages of their life cycles, benefiting from suitable shelter and feeding areas characterized by open spaces with scattered vegetation. The National EIA and monitoring by the Consultant at an adjacent WPP have recorded threatened species like *Miniopterus schreibersii* and *Nyctalus lasiopterus*, as well as long-distance migrants such as *Pipistrellus nathusii*, and species with high collision risk like *Pipistrellus* and *Nyctalus species*.
- Invasive Alien Species: *Xanthium spinosum* which is among the species defined as invasive in Türkiye according to the global invasive database was observed around T14 location.

Critical Habitat Screening: A CHA was carried out against relevant criteria to determine Critical Habitat trigger status, considering factors like global population, migratory patterns, and environmental stress periods. This involved examining globally important concentrations of species and assessing the potential impact of the Project on their populations. Based on current CHA evaluation, three habitats were determined as priority biodiversity feature. Additionally, one bird species, 6 plant species, 7 mammal species, one reptile species and two invertebrate species were identified as PBF for a total of 20 PBF triggers. However due to data gaps, potential Critical Habitat triggers were not conclusive and were deferred until 2024 baseline results.

Construction impacts were assessed as they pertain to biodiversity and found to cause both temporary disturbance type impacts and permanent impacts that would last after construction activities are over. Some of the more significant impacts are, in summary;

Vegetation Removal and Habitat Loss: Clearing natural habitats for construction leads to the loss of terrestrial habitat and flora species.

Disturbance from Noise, Light, and Vibration: Construction activities cause increased noise, artificial light, and vibration, disturbing wildlife.

Wildlife Injury from Construction Vehicles: Movement of vehicles and machinery poses a risk of injury or killing of wildlife.

Dust Emissions Impacting Wildlife: Construction equipment dust emissions can adversely affect wildlife populations, mainly sensitive flora species.

Soil Pollution: Pollution from run-offs, spills, and cleaning harms habitats.

Introduction of Alien Species: Construction activities may introduce invasive species, impacting native biodiversity.

International Recognised Areas (Akdag-Denizli KBA): The Project impacts the Akdag-Denizli KBA, leading to habitat loss, fragmentation, and disturbance. Construction activities will impact the KBA integrity in the forms of habitat loss and degradation (as a result of vegetation clearing and rock blasting for installation of the Project components such as roads, turbine pads, ETL route) including fragmentation and edge effects, disturbance to biodiversity values during construction activities, air pollution and invasive species introduction and competition. These effects are certain to occur within the Aol due to construction activities.

Habitats: Various habitats are affected, with limited impact due to the small construction footprint.

Flora: Habitat loss and pollution impact flora species, but the overall impact is minor.

Mammals (excluding bats): Limited impact on mammal species, mostly reversible.

Bats: Habitat loss and disturbance affect bat species, but impacts are reversible.

Birds: Construction affects bird habitats, with reversible impacts, except for high-sensitivity species.

Operational phase impacts were assessed as they pertain to biodiversity and found to cause mainly permanent impacts that would last for the lifetime of the Project without proper management. Some of the more significant impacts are, in summary;

Permanent Habitat Loss: Turbine areas and switchyards contribute to permanent habitat loss. The habitat fragmentation effect is expected mostly in grassland and forest habitats due to opened site roads and turbine locations. Turbine areas and switchyards contribute to permanent habitat loss. Considering that the areas covered by the Project impact area are quite small, the possibility of operation activities to affect basic biodiversity features is low. Some perching, nesting and roosting structures for birds and bats might be lost, however these impacts were considered to be of low magnitude and mitigation with artificial structures is feasible. The Project impacts on all these habitats affected directly are likely to be of minor magnitude during operation.

Introduction of Alien Invasive Species: The presence of turbines may introduce alien invasive species, impacting native biodiversity.

Wildlife Disturbance: Increased noise levels and artificial light from turbines disturb wildlife. The main receptors of noise and artificial light are nocturnal migrating small bird and bat species which might get dazed during migration due to lighting, and terrestrial fauna which would be under increased predation risk at night due to added lighting.

Collision and Electrocutation Risks: Bird and bat species face risks of collision and electrocution from turbines and power lines. The results of the Collision Risk Model did not predict increased collision risk (<0.00) for recorded species during the study periods, however should be confirmed with additional data from 2024. Bat species include high collision risk species in low activity levels, which will also be confirmed through added baseline.

Barotrauma Mortality Risks: Bat species may suffer barotrauma due to sudden changes in air pressure near turbines.

International Recognised Areas (Akdağ-Denizli KBA): Persisting impacts from construction in terms of habitat loss and degradation (as a result of vegetation clearing and rock blasting for installation of the Project components such as roads, turbine pads, ETL route) including fragmentation and edge effects, disturbance to biodiversity values during operation (mainly through regular vehicle access), air pollution and invasive species introduction and competition. The qualifying flora species of the overlapping KBA are likely to be present within the Aol. The trigger amphibian species is not likely to be found in the Aol but will still be considered as a precaution and can be impacted during the operation primarily through vehicle collision mortality.

Habitats: The Project Aol encompasses three natural habitat types, including *Pinus nigra* woodland, *Pinus brutia* woodland, and *Sub-Pannonic steppic grasslands, with Pinus nigra* woodland designated as of priority conservation importance under the EU Habitat Directive. The potential effects on habitats, primarily forest areas, include habitat loss and fragmentation due to access roads and turbine placements. During construction, operational impacts such as increased vehicle traffic and human activities are expected to directly affect these habitats to a moderate extent.

Flora: Operational activities in the project area aren't expected to heavily impact flora. However, the scarcity of subalpine grassland habitats and the potential permanent loss for species that rely on them could have significant consequences, possibly leading to population declines.

Mammals (excluding bats): While no threatened mammals were identified, persisting effects from construction include habitat loss and degradation, with negligible operational impacts. Some small and common mammal species could be affected within the Aol especially during blasting activities. Construction activities will impact the mammals and other terrestrial fauna the forms of habitat loss and degradation (as a result of vegetation clearing and rock blasting for installation of the Project components such as roads, turbine pads, ETL route). Direct loss of nests and shelter structures of these species will be limited to the footprint, while fragmentation and edge effects can be considered as impacting the Aol. Temporary disturbance during construction activities, pollution, light and noise disturbance, and accidental injury or death are possible. Construction impact on these species will be reversible for the most part. The magnitude of this impact to mammals of low conservation importance is minor.

Bats: During the operational phase, bat species face significant risks from collisions with turbine blades and barotrauma due to air pressure changes. Artificial lights may attract bats, increasing collision risks. While habitat loss continues, foraging opportunities may increase. Other impacts like displacement and barrier effects are less significant.

Birds: Hacıhıdırlar is not located on general major migratory routes, it may be a specific minor route for some large soaring migratory birds. Collision and electrocution risks affect resident and migratory bird species, particularly large soaring species, during operation. These impacts are considered major. Barrier effects for migrants are less pronounced but still significant. Due to insufficiencies in National EIA study, and desktop components such as citizen science records and low completion rate of Turkish Breeding Bird Atlas study for the atlas square in question, some species such as Golden Eagle cannot be properly ruled out. These species have slow reproductive cycles, and propensity for attraction and habituation to WPPs during operation which can increase mortality risks. The terrain also adds to the risks as these species are shown to exhibit lower flights on high slopes. Therefore, further clarifications to baseline will be undertaken prior to operation. During operation, collision and electrocution pose significant risks to resident and migratory large soaring species. The project's location isn't on a major migratory route, but risks to raptors preferring steppe and mountain habitats remain uncertain. Other impacts include displacement, avoidance, barrier effects for migrants, and minor influences like increased disturbance and pollution.

Additional Baseline (2024)

The National EIA baseline collected for the Project includes flora, fauna, bird, and bat surveys. These surveys were conducted according to national frameworks and while highly informative for an otherwise ill-studied region in terms of biodiversity (Boz Mountains), are relatively less comprehensive than as prescribed in international guidelines and best practices. Therefore, several deficiencies with each study were identified in terms of data quality and quantity.

A comprehensive baseline collection study consisting of flora, fauna, birds, bats, and invertebrates was scheduled for 2024 the results of which will enable significant refinement of the present CHA. The studies will close the data gaps described in the previous paragraph. Flora and terrestrial fauna surveys in ecologically appropriate season will cover sensitive species and areas previously not studied. Bird surveys will complete the second year of surveys for year-on-year coverage, include ETL route, provide better visual and seasonal coverage, and expand the breeding bird surveys with line distance sampling. Bat surveys will significantly expand the spatial coverage, number of consecutive nights per season, and 3 seasons will be covered. Invertebrate surveys were previously not conducted and will enhance the baseline as well.

The updated baseline will;

- Enable revision and refinement of the CHA, and BMP prepared for the Project,
- Inform if development of a Project Specific Biodiversity Action Plan (BAP) is necessary,
- A Shut-down on demand (SdoD) protocol will be developed if necessary,
- Enable refinement of mitigation objectives and measures,
- Inform development of net gain targets, if any.

Mitigation Measures

Mitigation measures are identified and recommended for the following: “Habitat, Flora and Ecosystem Services Loss and Degradation”, “Disturbance to Animal Species, Injury/Mortality”, “Accidental Introduction and Dispersal of Invasive Species”, “Collision, electrocution, and barotrauma”. Mitigation measures for the construction and operation phases will be managed in line with the BMPs prepared specifically for the project. Additionally, a Project BAP framework has been developed to be applied as necessary.

The general impact mitigation measures for construction and operation phases of the Project are shared below:

- All construction and operational working areas should be kept to a minimum to reduce habitat loss,
- All type of impact on natural habitats outside the Project footprint should be avoided during land clearance and topsoil removal,
- Boundaries of the construction areas, including traffic routes, should be limited only to designated sites,
- Seed collection of wildflower species should be conducted for critical habitat trigger species and priority biodiversity features and the seeds may be used during the restoration process.
- On-site vehicle speed limits should be implemented to avoid potential road-kills,
- Dust suppression measures, such as water sprays, should be implemented for reduction of dust during the working period,
- Installing artificial structures for nesting, roosting or hibernating fauna,
- Tree cutting (mainly for ETL) and rock blasting works should be accompanied by an experienced wildlife surveyor to check for nests and roosts.

- Minimise traffic and the distance it has travelled,
- Source goods/materials locally where possible,
- Contain any alien invasive species and report their presence,
- Where AIS have been confirmed, 'as-new' wash-down is essential before entering non-infested areas of the site and after working in infested areas,
- Invasive Species Management Plan will be developed to minimize construction and operation impacts
- Artificial lighting will be managed carefully to avoid attracting and dazing migrants,
- The ETL will be marked throughout to increase visibility,
- A Shut-down on demand (SDoD) or equivalent turbine management program will be implemented and maintained unless operation monitoring results strongly suggest negligible/low impact. SDoD will be applied for areas defined as Critical habitat in terms of ornithology. Additionally, BAP Framework will include SDoD commitments.
- The Project components will be managed to not offer perching and nesting opportunities, safe perching, roosting and nesting opportunities will be provided,
- Turbine curtailment approach regarding bat mortality mitigation will be developed.
- A post-construction biodiversity monitoring programme will be scheduled in order to demonstrate the real impact on biodiversity, to further inform mitigation measures and objectives, and track performance with regards to mitigation.
- Trainings will be provided to raise awareness of all site personnel.

3.12 Social Environment

Based on desktop studies conducted using documents shared by the Project Company, it was determined that the social Area of Influence (Aol) for the Project encompasses a total of five neighbourhoods in Karacasu, Sarayköy and Babadağ districts in Aydın and Denizli provinces. These are the nearest settlements to the Project area including Ataköy, Hisar, Karacaören, Kiranyer and Yeşilyurt neighbourhoods.

A site visit was conducted by Mott MacDonald Social Team on 8 December 2023. During this site visit, baseline information on the neighbourhoods affected/will be affected by the construction and operation phases of the Project was collected. The potential social impacts of the Project identified as a result of the studies are given below:

- A total of 87 parcels across five settlements in three districts within two provinces require designated areas. Among these parcels, five are public lands, and there is a forestland spanning 356,687.48 square meters. Approximately 37% of the affected areas consist of private lands, which are owned or shared by 82 individuals. These private lands are associated with 131 PAPs (owners/shareholders). Additional PAPs will be affected by ETL which is an AF to the Project.
- Physical displacement is a displacement, whether full or partial and permanent or temporary, that occurs when individuals or communities are no longer able to physically occupy an area and must relocate to a new location. Economic displacement is loss of assets or access to assets that leads to loss of income sources or means of livelihood. The Project's physical resettlement strategy is to avoid relocation in accordance with PS5 and PR5. There are buildings on the affected lands but no residential and commercial buildings are affected by the Project.
- According to available expropriation data, there are residential buildings on six private lands affected by the land acquisition of the Project. However, these houses are outside the expropriation area. According to RAP preparation field study there are also houses on parcel no. 101/416 and 101/800 in Karacaören. The impact assessment studies and investigations

conducted for the structures within the setback distances have not been completed yet. Relevant revisions will be made in the RAP once the identification and assessment of structures located in proximity to the turbines are completed.

- ESIA studies point out that there are structure owners whose structures are within the turbine setback area of the Project. However, it should be noted that no physical displacement is observed within the scope of the Project's RAP field studies. Still, impact assessment studies have not been completed yet. Relevant revisions will be made once the identification and assessment of structures located in proximity to the turbines are completed.
- There are no workplaces or commercial buildings affected by the land acquisition of the Project.
- According to RAP preparation field study, there are affected non-residential structures (water well, toilet, fences) on six lands are affected by land use of the Project. When the land valuation reports prepared for the lands where the buildings are located were examined, some deductions that did not comply with PS5 and PR5 were detected. These are depreciation deductions and are recorded in Asset Inventory and Census as compensation payable from the RAP fund.
- The dust generated by construction of access roads may negatively impacts nearby agricultural products, reducing their quality and market value.
- Construction activities and increased traffic may cause negative impact on community health and safety (i.e noise, air quality, abnormal load transportation, etc.). Nevertheless, no significant impact is expected on the roads used by settlements nearby.
- Local employment creation during construction may lead to a more positive perception of the Project by the community, reduce unemployment, and improve the well-being of workers and their families.
- During the construction phase of the Project, there will be numerous procurement opportunities which may be beneficial for the local business, enterprises and suppliers in terms of income generation and increase.
- Construction activities may cause disruption in the daily lives of the local community members by causing temporary water shortages or contamination of natural spring water. Additionally, foundation installation, and turbine erection can pose risks to the local community's safety. These activities may involve heavy machinery, increased traffic, and construction materials, which can lead to accidents, air and noise pollution, and disruption of local infrastructure (i.e., drainage channels).
- The potential influx of male workers into neighbourhoods due to the Project construction activities may impacts on women's daily lives and their livelihood activities. There are 150 workers during the construction phase of the Project. The presence of male workers might heighten the risk of harassment or other safety incidents for women (like those who return home alone). However, such concerns were not mentioned by women community members and mukhtars during the site visit consultations.
- The groups who are considered to be vulnerable because of their daily life practices and/or access to certain services (i.e., health facilities in the district) might be affected disproportionately and negatively due to Project impacts. The vulnerable groups are women, students, the landless/homeless people, the elderly, people with disabilities and unemployed people.

Within the scope of the Project, a total of seven people, five Enerjisa Üretim employees and two subcontractor employees, are expected to work in the Wind Power Plant at the same time during the operation phase. During the operational phase of the Project, there won't be a substantial impact on the local population. The turbines' control and safety will be managed centrally, eliminating the need for additional local workers. As a result, no adverse impacts are

expected on the regional population or any undue pressure created. On the other hand, within the Project area, there are pasture lands and the primary worry expressed by local community members revolves around income reduction for households dependent on animal husbandry. According to the Project Company representatives, the turbine zones will remain unfenced, allowing herds to graze freely. During the operation phase of a wind power plant, one of the notable risks to community health and safety is associated with blade throw incidents, aviation, electromagnetic interference, traffic, shadow flicker, noise.

Mitigation measures

In order to mitigate the impacts that are identified for the construction and operation phases of the Project, certain measures are identified and listed below:

- The Project-specific SEP and community grievance mechanism will be put in place to consult with the Project affected people and to be able to capture individual grievances related to the land acquisition and expropriation processes.
- For the development and establishment of a systematic way to compensate, the RAP is being prepared and will be implemented once finalized. RAP includes a LRP to restore livelihoods' (mitigations to be carried out the cases of an economic displacement) of those affected PAPs at least to pre-project condition. Livelihood Restoration Plan aims to enhance the long-term resilience and adaptability of livelihoods for Project-Affected Settlements (PASs) and prioritize Project-Affected Households/Persons (PAHs/PAPs) in line with international development guidelines by developing strategies to rehabilitate livelihood activities and ensure the sustainability of the PAHs' livelihoods. The Project's livelihood restoration strategy aims to bolster livelihoods physically, economically, and culturally, making them more resilient to challenges like climate change, land degradation, and project-related impacts. PAPs/PAHs/PASs will be received additional assistance as part of the LRP.
- In accordance with the principle of compensation at full replacement cost of IFC PS5 and EBRD PR5, measures have been taken to ensure that all households can replace the land they have lost. IFC defines the "replacement cost", with regard to land and structures within the scope of the Project, as follows:
 - agricultural land—the market value of land of equal productive use or potential located in the vicinity of the affected land, plus the cost of preparation to levels similar to or better than those of the affected land, plus the cost of any registration and transfer taxes;
 - household and public structures—the cost of purchasing or building a new structure, with an area and quality similar to or better than those of the affected structure, or of repairing a partially affected structure, including labour and contractors' fees and any registration and transfer taxes.
- Potential risks to local communities will be identified by the Project Company and a Code of Conduct (CoC) in local community relations will be prepared. Additionally, the Project workers will receive regular trainings upon the recruitment and throughout the employment on the social sensitivities, prevention and ways to report Gender Based Violence Harassment (GBVH), measures to be taken to avoid social unrest and conflicts, and documents to be disclosed to and signed by the Project. GBVH encompasses sexual exploitation, abuse, and harassment, along with non-sexual violence and harassment which can inflict physical, sexual, or psychological harm, and includes threats, coercion, or arbitrary deprivation of freedom, occurring in both public and private life.
- Within the scope of the SEP and community grievance mechanism of the Project, grievances of residents regarding the infrastructural issues will be monitored by the CLO)
- The Project Company will develop a Local Content and Procurement Procedure (LCPP) by defining the potential local economic and livelihood opportunities.

- Potential risks on the vulnerable groups will be identified by the Project Company and relevant items will be included in the CoC that will be prepared by taking into account the local community structure.

Residual impacts on social environment for the construction period are changing from negligible to moderate. Residual impact on social environment for the operation period is negligible.

3.13 Labour and Working Conditions

Potential impacts on labour and working conditions, including the occupational health and safety risks associated with the construction and operation workforce of the Project together with its subcontractors are assessed in ESIA Report. The methodology for assessing the impact of labor and working conditions involves two main components:

- **Desktop Studies:** These entail a thorough examination of relevant documents, including materials shared by the Project Company and the primary contractor (Enercon). Additionally, publicly available data, international standards, and best practices are reviewed.
- **On-Site Visit:** A site visit was conducted by Mott MacDonald Social Team on 25 and 26 October 2023.

Occupational Health and Safety

A risk assessment is performed for Occupational Health and Safety to:

- determine the hazards that exist in a workplace or that may come from outside,
- identify the factors that cause these hazards to turn into risks,
- analyse and ratify the risks arising from the hazards and
- define control measures to be taken.

As a result of the risk assessment, following issues were identified as high risk:

- **Traffic safety:** Transport of heavy machinery materials, and increased movement of construction vehicles can lead to altered traffic patterns and heightened risks of accidents,
- **Life and fire safety:** A number of activities collectively increase the vulnerability of the construction site to fire incidents, jeopardizing the safety of both construction workers and nearby communities,
- **Explosive use and blasting:** During construction, where soil and rocks cannot be excavated with conventional equipment, ammonium nitrate / fuel oil (ANFO), an explosive made of ammonium nitrate and diesel fuel, can be utilized, which will potentially pose risk on workers.
- **Electromagnetic Interference and radiation:** The operation of a wind power plant introduces potential risks related to Electromagnetic Interference (EMI), particularly concerning the electricity transmission infrastructure. Moreover, the generation and transmission of electrical power within a wind power plant may also give rise to concerns related to Electromagnetic Radiation (EMR)
- Risk of accidents in result of poor Occupational Health and Safety (OHS) risk management both for construction and operation phases
- Risk of occupational diseases for construction phase
- Risk of accidents in result of earthquake and structural failure and risk of fire and explosion accidents for operation phase

The mitigation measures that will be applied to reduce or avoid the potential occupational health and safety risks during the construction phase will include but not be limited to the following:

- All national health and safety regulations and international requirements will be followed by the Project Company and their contractors,

- Occupational Health and Safety Management Plan, which is structured to cover site specific risks and appropriate mitigation and monitoring requirements, will be developed and implemented. Those mitigations include PPEs usage, induction and regular refresher training courses for personnel, regular audits and inspections in line with the national and international requirements,
- Risk assessments, covering site and Project specific OHS risks, will be conducted.
- OHS mitigation measures will be designed and implemented following a structured Health and Safety Management System as defined in Occupational Health and Safety Management Plan,
- Health and safety organizational structure will be developed which involves sufficiently qualified health and safety personnel for Project specific risks.

Labour and Working Conditions

Potential impacts on labour and working conditions that may occur during the construction phase of the Project are summarized below by considering the whole Project workforce including the main contractor, subcontractors, and supply chain workers:

- Not providing reasonable working conditions and terms of employment poses a risk for the Project workforce. The workforce has a medium sensitivity for this impact.
- Presence of the security personnel may lead to labour rights violation (including gender consideration) and conflicts among the workforce.
- Restricting workers from developing their own organisations and/or unions as well as alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment might be a risk within the scope of the Project.
- Project workers may not be adequately informed about the existing Project grievance mechanism as well as available grievance channels and the terms and conditions of their employment under the Project activities.
- The contractor, subcontractors and suppliers may not have adequate knowledge of international standards and practices regarding the management of contractors, subcontractors, and supply chain. Contracted, subcontracted and supply chain workers have medium sensitivity to this impact.
- Contractor Selection, Evaluation and Management Procedure will be applied.
- Enercon and its subcontractors of the Project may use compulsory overtime to complete the works on time but may not pay for overtime. On the other hand, overtime may exceed 270 hours per year. Workers are sensitive to this impact at medium level.
- GBVH risks towards the workers and residents of the Project affected neighbourhoods may occur unless proper preventive measures are taken.
- The conditions within the workers' camps and/or other facilities (i.e., refectory, toilets) may not meet the international standards (i.e., space per person, number of people per room, hygiene of rooms and other facilities within the camp).
- The management of the demobilisation process at the end of the Project's construction phase and retrenchment process in times of necessity may not meet the international standards. The receptors' sensitivity is medium. The magnitude of the impact is moderate, which corresponds to a moderate level of significance.
- The Project has the potential to employ people from nearby neighbourhoods. People living in neighbourhoods close to the Project have medium sensitivity to this impact.

The magnitude of the impact is moderate for all potential impacts during the construction period.

Potential impacts on labour and working conditions that may occur during the operation phase of the Project are summarized below by considering the whole Project workforce including the main contractor, subcontractors, and supply chain workers:

- Not providing reasonable working conditions and terms of employment poses a risk for the Project workforce. The workforce has a medium sensitivity for this impact. The magnitude of the impact is moderate, which corresponds to a moderate level of significance.
- Presence of the security personnel may lead to labour rights violation (including gender consideration) and conflicts among the workforce. Workers are sensitive to this impact at medium level. The magnitude of the impact is moderate, which corresponds to an impact with a moderate level of significance.
- Restricting workers from developing their own organisations and/or unions as well as alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment might be a risk within the scope of the Project. The workforce has a medium sensitivity for this impact. The magnitude of the impact is moderate, which corresponds to a moderate level of significance.
- Project workers may not be adequately informed about the grievance mechanism and the terms and conditions of their employment under the Project activities. Workers are sensitive to this impact at a medium level. The magnitude of the impact is moderate, resulting in an impact with a moderate level of significance.
- GBVH risks towards the workers and residents of the Project affected neighbourhoods may occur unless proper preventive measures are taken. The sensitivity of the receptors to this impact is medium and the magnitude of the impact is moderate. This results in an impact with a moderate level of significance.
- The Project is estimated to contribute to the overall human resource capacity that is competent in operation of wind turbine projects at national context. The number of experienced and expert personnel is expected to increase in line with the Project improvements. In this regard, the sensitivity of the people in Türkiye has negligible sensitivity about this impact. The magnitude of the impact is moderate. Overall, this will lead to an impact with negligible significance level.

Regarding the potential impacts of the Project on labour and working conditions during the construction and operation phases, the following mitigation and enhancement measures will be applied:

- HR & Worker Management Plan (covering both the management of contractor and subcontractor labour) will be developed for construction and operation phases of the Project separately,
- HR & Worker Management Plan for the construction phase will include Workers' Accommodation Plan to ensure that necessary camp management actions are applied within the Project's mobilization area in line with the Lenders' standards and requirements. The assessment of environmental and social conditions of all mobilization areas will be undertaken with respect to the specified requirements.
- Enercon will finalize and implement the HR and worker management procedures covering the processes from recruitment and employment.
- HR & Worker Management Plan together with the HR Policy and other relevant corporate policies of the Project Company as well as the HR and worker management procedures and other applicable corporate level policies of Enercon that address non-discrimination and equal opportunity, workers' rights and benefits, right to unionization, grievance mechanism, child and forced labour in line with the national and international requirements will be implemented throughout the Project lifecycle and disclosed to all Project workers including subcontractors.
- Corporate level Security Personnel Code of Conduct of the Project Company will be implemented once finalized.
- Corporate level GBVH Policy of the Project Company will be implemented once it is finalized and established.

- A Project Grievance Mechanism Procedure already be established, and this procedure incorporates key principles, including confidentiality and anonymity, and define available channels for submitting complaints. It also specifies timeframes for acknowledging receipt of complaints and subsequent resolution. Additionally, the procedure outlines the management and resolution process, with clear responsibilities assigned to the relevant Project staff,
- The fact that vulnerable workers (i.e., women, disabled, migrant workers) are included and protected will be ensured through the items specified within the Code of Conduct in line with the Lenders' standards and requirements.
- Quota for the employment of female workers to provide gender equality will be established in line with the Project Company's gender equality objectives.
- Corporate level Retrenchment Policy of the Project Company will be implemented once finalized.
- The Project Company will conduct periodic labour audits that will be taken internally as well as by the external parties to determine the labour management performance and identify the gaps related to the labour management as per the national legislation, Lenders' standards and requirements as well as ILO and other applicable international requirements.

Labour and working conditions as well as OHS related residual impacts during construction and operation phases of the Project are negligible.

3.14 Community Health and Safety

The Turkish legislative framework adhering to rules such as the EIA Regulation, OHS legislation, zoning plans and land use regulations, and the Noise Pollution Control Regulation, was addressed to assess community health and safety issues in wind power projects. The assessment of the community health and safety issues was also performed based upon international regulatory framework and applicable standards for the Project such as IFC Performance Standard 4, IFC General EHS Guidelines: Community Health and Safety, IFC EHS Guidelines: Wind Energy, and EBRD Performance Requirement 4.

The baseline conditions regarding community health and safety are shared below for the Project:

- Life and Fire Safety and Emergency Response: AFAD (Disaster and Emergency Management Directorate) in Turkey, with 81 branches and eleven units, has successfully coordinated Turkey's response to earthquakes and floods over the past seven years. There are hospitals and an operating police station in the Babadağ district. Additionally, there is one fire station located in Babadağ.
- Traffic & Transport: The project area's traffic and transport features have been assessed using Hacıhıdırlar WPP National EIA Report, Open Street Map Geodatabase, Google Earth Satellite Images, and General Directorate of Highways, 14th Regional Division Traffic Volume Maps.
- The traffic volume estimations of the state roads within the General Directorate of Highways, 14th Regional Division jurisdiction is also evaluated. The closest junction to the Project area is located near the Karacasu district. Accordingly, it is estimated that total of 2,655 vehicles per day passing through this location including 2,002 Automobiles, 319 medium load commercial vehicles, four busses, 187 trucks, and 143 trailers, tractors and semi-trailers each day. The figure below demonstrates the sensitive receptors within the Project Area.

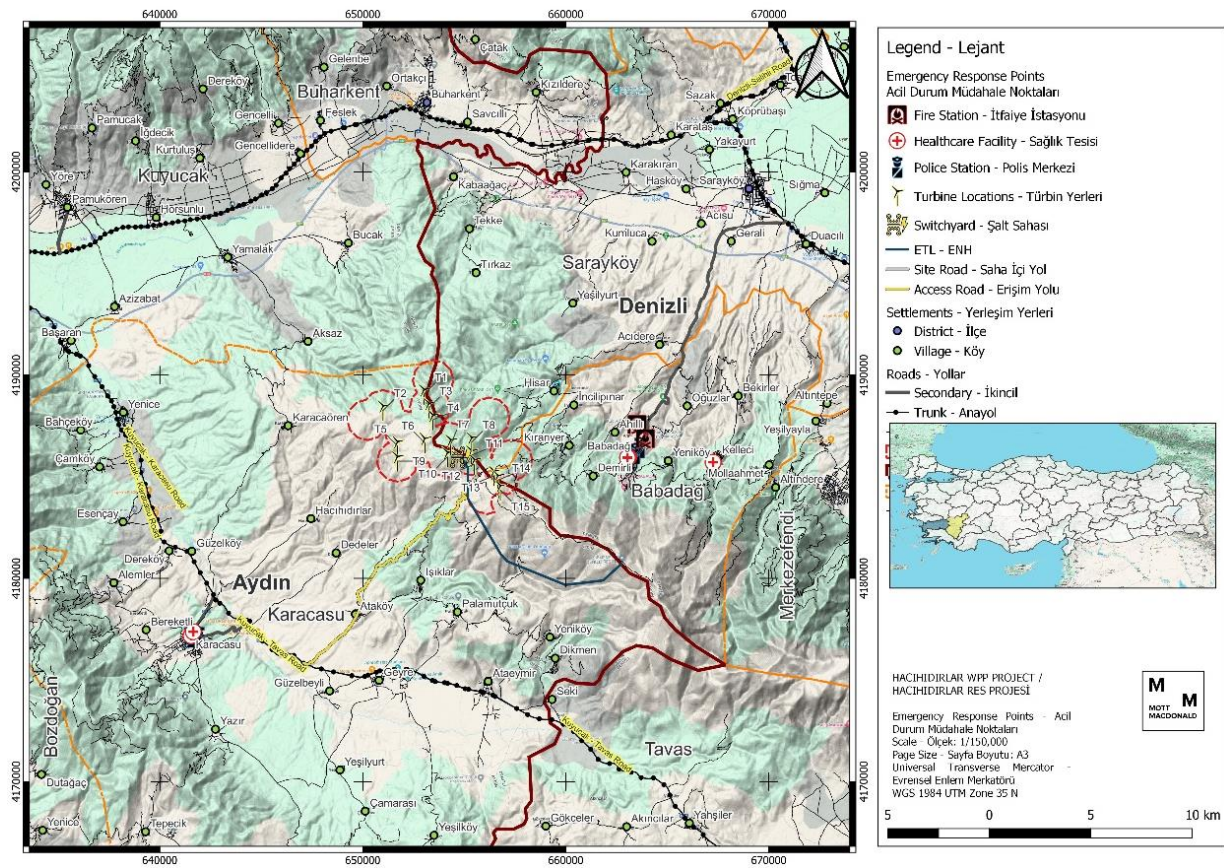


Figure 3.4: Emergency Response and Sensitive Receptor Points

- Community Grievances: The Project has an external grievance mechanism for community members and stakeholders, which will be revised to meet international requirements. The Project Company has been organizing stakeholder engagement and consultation activities together with the support of the appointed social consultancy company. As per the documents provided by the Project Company, a number of concerns which were raised by the local community members with regards to community health and safety were noted and similar concerns were observed during the site visit consultations in December 2023. As stated in the PID of ETL, regarding the parts remaining in Agricultural Areas, permission for non-agricultural use will be obtained according to Article 13 of the Soil Conservation and Land Use Law No. 5403. According to the permissions to be received from the Ministry of Agriculture and Forestry, there are no agricultural infrastructure on these routes that would prevent the land use.

Construction impacts were assessed as they may pose significant risks to community health and safety, particularly in mountainous terrain. Some of the impacts that are considered to be minor and moderate after the mitigation measures are as follows,

Water, Noise and Air Quality: According to the detailed assessment of runoff from construction, stormwater runoff and groundwater contamination, minor risks were foreseen for water sources due to the project's distance from surface water bodies and limited activities affecting groundwater. Moreover, there are no agricultural infrastructure that would prevent the usage for non-agricultural purposes on the footprint of the Project Area as "Permission for non-agricultural use" is obtained from the Ministry of Agriculture and Forestry. People engaged in livestock activities and drivers using highways near the site may be exposed to air emissions and noise. However, according to the assessment performed in Chapters 7 and 9 of Hacıhıdırlar WPP ESIA Report and Section 3.3, 3.5 and 3.7 of Hacıhıdırlar WPP NTS but no significant impact is anticipated from air quality and noise.

Structural Safety of Project Infrastructure: Project area is in 1st Degree Earthquake Zone. The Project Area is not subject to erosion risk. Hence, there is a minor risk to the stability of structures due to soil erosion. Moreover, Chapter 6 of Hacıhıdırlar WPP ESIA Report Section 3.4 of Hacıhıdırlar WPP NTS highlight that after implementing mitigation measures in the Erosion Control Management Plan, there is a minor risk to structure stability. .

Life and Fire Safety (L&FS): The Project Area, located far from settlements, poses no significant fire risk due to construction activities.

Traffic Safety: The construction phase of a project near the access road is expected to increase traffic load by around 2,655 vehicles, affecting the existing traffic load by 4.6 %. The project's impact on traffic load is negligible, as most locals engage in livestock activities, and the interaction between the construction and local agricultural activities is negligible. The traffic load of the ETL construction is calculated to be 0.34 %. However, the construction phase of the Project will cause additional traffic load on the existing road network due to transportation of materials and waste. The maximum daily heavy vehicle operation is estimated to be 40. Project Vehicles will exclusively use designated access roads to minimize traffic load and its adverse effects.

Transport and Storage of Hazardous Materials: *Chemical* transportation and storage will be conducted in small quantities, avoiding nearby settlements. No significant chemical and hazardous management are expected to impact soil contamination, ensuring minimal environmental impact.

Disease Prevention: The project is a large scale WPP those construction period will last around 13 months. There will be 150 workers at the time of construction at its peak. However, these workers will be residing in a camp site where they will be in no contact with the local people. Hence, the risk of disease spread in Social Aol communities will be insignificant.

Emergency Preparedness and Response: The construction phase of a project can cause risks to local communities, including dust emissions, noise pollution, ecosystem disruption, and strain on emergency response capabilities, while the installation of turbines may increase electrical hazards. Hence, the impact is considered to be moderate.

Ecosystem Services: The Project's impact on priority ecosystem services may pose health and safety risks (e.g. increased traffic load, wildfires etc.) and affect local community members. The Project's scope includes using water sources from local authorities, which may impact livestock and agricultural activities. Regular environmental monitoring of construction activities and continuous engagement with local authorities will be implemented. Hence, the overall impact is considered to be minor.

Public Access: Construction activities could disrupt daily life and cause conflicts due to restricted access to certain areas. The project footprint is not on common routes; some routes may be temporarily affected for livestock activities. The wind turbines and switchyard construction areas may pose a temporary public access risk during construction due to animal husbandry activities near these areas. However, Regular updates through community engagement programs will be implemented. Hence, the overall impact is considered to be minor.

Security Personnel: The construction phase's deployment of security personnel raises concerns about community safety. Mismanagement or perceived threats could lead to tensions, affecting community well-being. Detailed mitigation measures for the security personnel and security management area outlined in the Security Management Procedure that will be complied with. Hence, the impact is considered to be negligible.

Some of the impacts that are considered to be minor and moderate after the mitigation measures that may occur during the operation phase are as follows,

Aviation: Wind power plant operation poses aviation safety risks due to towering turbines near flight paths. Pilots face collision risks with turbine blades or turbulence. The closest airport is Denizli Çardak Airport which approximately 80 km away from the WPP License Area. An opinion letter is received from the Department of Aviation indicating that it would be appropriate to make day and night marking and lighting in international standards in a way to indicate that the planned WPP and related facilities are obstacles. With this regard.

Electromagnetic Interference and Radiation: The National EIA Report found that electromagnetic pollution around power plants and turbines is below World Health Organization (WHO) and ICNIRP limits, with the highest values found in Phase-1 (measurements taken from the planned turbines and their surroundings and close settlements within the social AoI) at 2.19 V/m and 0.09 µT and Phase-2 (analysis of the potential impact of wind turbine start-up using previous studies and academic literature) at 3.1 V/m and 0.17 µT. The electromagnetic environment created by WPP turbines is expected to remain below these limits. Also, in the measurements, both electric field and magnetic field (**Table 3.3**) It was observed that the effect decreases as you move away from the source and the measurements are below WHO and ICNIRP limits.

Table 3.3: Electric and magnetic field measurement results for ETL

Type of facility	Electric field (kV/m)	Magnetic field (mG)
154 kV Electricity Transition L-ne	0.3 - 1	9-14
154 kV transfer station	0.1-2	30-140
Limits	5	2000

Noise: During the operation phase, turbines generate noise due to their mechanical and electrical components and aerodynamic effects. This may affect students near schools or houses, but there are no identified receptors, and the sensitivity is low. No significant land users located in vicinity to the Project which will be subject to noise impacts.

The impact mitigation measures for construction and operation phases of the Project are shared below:

- **Life and Fire Safety:** The project involves strict safety protocols, fire prevention measures, emergency evacuation plans, and firefighting equipment. Regular drills and training for construction personnel will ensure worker well-being and prevent fire incidents. Local communities will also be informed about potential risks and regular consultations are conducted to ensure safety. Furthermore, the Community Health and Safety (CHS) Plan and Emergency Preparedness and Response Plan (EPRP), which include the necessary protocol for responding to any occurrences, will be followed as part of the mitigating measures.
- **Traffic Safety:** The project will implement a Traffic Management Procedure, focusing on minimizing disruptions and maintaining a safe traffic environment. It will comply with the Motorway Traffic Law and include measures like regular consultations with school administration, awareness raising, and driver training. Furthermore, the CHS and Traffic Management Plan will be followed as part of the mitigating measures.
- **Disease Prevention:** Hygiene practices, sanitation facilities, health and safety guidelines, regular screenings, vaccinations, awareness campaigns will be implemented for preventing disease spread during construction. Furthermore, the CHS and EPRP will be followed as part of the mitigating measures.

- **Emergency Preparedness and Response:** An EPRP is prepared to be implemented during construction phase, involving key measures for all project stages, and shared with local authorities to increase awareness of potential risks and mitigations. Furthermore, the CHS and EPRP will be followed as part of the mitigating measures.
- **Ecosystem Services:** To minimize ecosystem impacts, planning, erosion control, habitat restoration, sustainable construction practices, regular environmental monitoring, and engagement with local authorities will be ensured for preserving vital services. Furthermore, the CHS Plan will be followed as part of the mitigating measures.
- **Public Access:** The Security Management Plan will be implemented to address construction-related limitations, ensuring transparency and compliance with the necessary requirements for public understanding. Furthermore, the CHS Plan will be followed as part of the mitigating measures.
- **Security Personnel:** Positive interactions with the local community during construction, effective communication channels, community liaison officers, and regular feedback mechanisms will be established to foster a safe and secure construction environment. Furthermore, the Security Management Procedure will be followed as part of the mitigating measures. It shall be noted that the SMP also include the necessary provisions to respect human rights as well.

Some of the impacts that are considered to be minor and moderate after the mitigation measures that may occur during the operation phase are as follows,

- **Ice and Blade Throw:** Blade/Ice throw incidents in wind power plants may pose a significant risk to community health and safety due to the rotating blades. Factors like material fatigue, manufacturing defects, or weather conditions can cause blade detachment, causing debris to be thrown over a significant distance. Blade/Ice throw incidents in wind power plants may pose a significant risk to community health and safety due to the rotating blades. Factors like material fatigue, manufacturing defects, or weather conditions can cause blade detachment, causing debris to be thrown over a significant distance. Within this scope, an assessment has been made for ice and blade throw separately. With this regard, 16 structures within the setback distance and ice throw distances were identified for blade/ice throw risks; in addition, blade loss risks were also evaluated for average and maximum wind speed as well and found out that there are 13 structures within the average and 6 structures within maximum wind speed throw zone. Given that the impact is negligible, although the receptor sensitivity is medium, blade throw impact significance is considered to be negligible and due to the structures within the setback zone, and ice throw impact is considered to be major. Advanced technologies and operational controls, such as sensors, monitoring systems, de-icing systems, and adherence to the Community Health and Safety (CHS) Plan and EPRP, are used to mitigate risks associated with blade and ice throw incidents.

Some of the impacts that are considered to be minor and moderate after mitigation measures that may occur during the operation phase are as follows,

- **Aviation:** Radar systems, clear communication with air traffic control, warning lights on wind turbines, and ongoing engagement with aviation stakeholders might be implemented to ensure airspace safety, reducing collision risks. Furthermore, the CHS Plan will be followed as part of the mitigating measures
- **Electromagnetic Interference and Radiation:** Compliance with safety standards that involves electromagnetic shielding, maintaining safe distances, and implementing advanced monitoring systems will be ensured to minimize electromagnetic interference and radiation risks. Furthermore, the CHS Plan will be followed as part of the mitigating measures
- **Noise:** The CLO will continue organizing consultations and stakeholder engagement activities under the SEP, while establishing a community grievance mechanism for easy

access for teachers and students to voice their grievances. Furthermore, the CHS Plan will be followed as part of the mitigating measures.

CHS related residual impacts during operation phase of the Project are changing from low to negligible. Residual impacts during construction phase of the Project is changing from minor to negligible.

3.15 Cultural Heritage

The determined Aol of the Cultural Heritage Impact Assessment (CHIA) for tangible and intangible cultural heritage assets are as described in Table 3.4.

Table 3.4: CHIA Borders⁹

	Tangible Cultural Heritage	Intangible Cultural Heritage
Impact Assessment Aol	All Project Area ¹⁰ (Project License Area, Access Roads, Switchyard and Turbine Locations)	Aydın/ Karacasu- Hacıhıdırlar Neighbourhood, Aydın/ Karacasu- Ataköy Neighbourhood, Aydın/ Karacasu- Karacaören Neighbourhood, Denizli/ Babadağ - Kıranyer Neighbourhood, Denizli/ Sarayköy - Hisarköy Neighbourhood.

Four phases have been undertaken in evaluating the present status of the tangible and intangible cultural heritage assets for the Project under CHIA. These phases are as follows:

- Desktop Research Study Phase
- Field Research Phase
- Impact Assessment Phase
- Reporting Phase

In summary, there are three unregistered cultural asset within the Project area. Apart from these cultural assets, no other cultural asset was identified within the Project area.

World Heritage List¹¹ and World Heritage Tentative¹² List of UNESCO are considered under the internationally recognised cultural heritage sites. Among the sites included in the World Heritage Tentative List of UNESCO, one (1) site is located in the wider region of the Project area. The closest site to the Project area is the “Archaeological site of Laodikeia” in Denizli, which is located at a distance of 26 km to the east of the Project area. None of the internationally recognised cultural heritage sites is overlapping with the Project area. Therefore, project activities do not have any impact on the areas listed neither in the World Heritage List or the World Heritage Tentative list.

The study area's settlements are not expected to experience harm due to the Project activities, as per desk studies and field works. Access to intangible cultural heritage elements, such as the

⁹ The impact area (Aol) for tangible cultural heritage was limited by the area where Project activities to be conducted, i.e., the Project licence boundaries. The boundaries for intangible cultural heritage were determined by taking into consideration the settlements where cultural elements can be found around the Project area.

¹⁰ The "archaeological walkover survey" to identify the possible cultural heritage assets within the Project license area was carried out in accordance with 2 different digital datasets (“YEKA RES-2.kmz” – “Phase-1 Construction Projects.kmz” and “Energy Transmission Line.kmz” – “Approach Roads.kmz”). The Client provided these datasets on 14 September 2023 and 18 September 2023, respectively. The conducted intensive surveys have only focused on turbine locations, access roads, site roads, switchyard, and other Project facilities in accordance with the provided datasets. The remaining Project license area has been observed and the data is collected. The updated Project digital dataset (labelled as 01_DESIGN) was provided by the Client on 1 November 2023. According to the updated Project location data, it is understood that several turbine locations have been changed and new site roads have been added to the Project. Therefore, detailed intensive surveys could not be carried out in the newly added areas to the Project. The general observation and obtained data for the Project area were taken into consideration for these revised locations to prepare the CHIA report prepared for the Project.

¹¹ UNESCO World Heritage Convention. (n.d.) *World Heritage List*. <https://whc.unesco.org/en/list/>

¹² UNESCO World Heritage Convention. (n.d.) *Tentative Lists*. <http://whc.unesco.org/en/tentativelists/>

Energy Transmission Line and Access Road, is not restricted in the license area. Hence the impact of the project activities are expected to be negligible.

Provided that mitigation measures are implemented during the construction phase, the impact on cultural heritage during the operating phase will be negligible.

Mitigation Measures

Additional mitigation measures to be taken by the Project Company for the construction phase are summarized below:

- In order to clarify the vibration caused affects that may occur on the cultural heritage assets during the construction phase, a risk analysis report -if required by as a result of the opinion of the Authority- will be prepared and the report will be shared with Project's shareholders and Aydın Regional Council for the Conservation of Cultural Property. Additional measures (such as structure reinforcement, creating for a buffer zone for the cultural heritage assets, selection, and mobilisation of proper construction equipment to minimize vibration near the archaeological assets during the construction phase etc.) will be taken according to the result of the report.
- A complaint mechanism will be established within the scope of the Project, through which complaints related to cultural heritage can be submitted and the complaints and producing solutions are periodically monitored.
- In case of a cultural heritage related salvage and/or test excavation (including restoration/conservation) required, it will be ensured that necessary staff, technical assistance, other necessary services and equipment are provided.
- An archaeologist (as a cultural heritage monitoring specialist) will be employed under the project organisation chart or a cultural heritage monitoring consultancy service will be assigned to make daily archaeological monitoring during the construction phase. The mobilisation of the monitoring archaeologists or consultancy service will be made before the construction activities of the Project, and the name and posts of the archaeologists or consultancy service will be specified in the organization chart of the Project in all documents.
- The cultural heritage/archaeological monitoring expert/s will work with the equipment operators and have authority to stop the work. The expert/s will accompany all ground disturbance activities of the project.
- The expert/s will instruct the operator to stop the work in case of a chance find. Continuation of the ground disturbance activities after a chance find will also be under the authority of the expert/s.
- The expert/s of the Project will train the employees about Cultural Heritage Management Plan and Chance Find Procedure.
- The expert/s will ensure that Cultural Heritage Management Plan and Chance Find Procedure are adequately enforced during all ground disturbance activities.

3.16 Cumulative Impacts

Within this scope of Cumulative Impact Assessment (CIA), the process identified within IFC's *Good Practice Handbook: Cumulative Impact Assessment and Management*¹³ has been followed. According to this Guideline, Valued Environmental and Social Components (VECs) are environmental and social attributes crucial for risk assessment, including physical features, ecosystem services, natural processes, social conditions, and cultural aspects. VECs are the ultimate recipients of impacts, often at the ends of ecological pathways. The CIA process uses these VECs as assessment end points.

¹³ IFC's Good Practice Handbook Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets, 2013

In this context, VECs that may be potentially affected by the Project are considered. The VECs have been identified based on the available information obtained for the activities/developments in the vicinity of the Project site and considering the environmental and social conditions of the study area.

The VECs that have been identified for this Project are identified as follows:

Table 3.5: Valued Environmental and Social Component (VECs)

Area of Concern	VEC	Specified VECs
Land Loss	Agriculture and Forestry	Agricultural and Forest Areas
Air emissions, noise	Air quality and noise levels in settlements nearby the Project Area	Nearby settlements
Climate & GHGs	Flora and Fauna	Akdag-Denizli KBA
Biodiversity	Potential Critical Habitats/Species	G3.5 <i>Pinus nigra</i> woodland E4.4 Alpine-subalpine grassland Akdağ-Denizli KBA <i>Colchicum micaceum</i> <i>Nephelochloa orientalis</i> <i>Centaurea aphrodisea</i>
	Natural Habitats	G3.5 <i>Pinus nigra</i> woodland G3.7 <i>Pinus brutia</i> woodland E4.4 Alpine-subalpine grassland
	Flora and Fauna Species with High Conservation Priority Priority Biodiversity Features	Endemic and / or Red List category CR, EN, VU, Flora Endemic and / or Red List category CR, EN, VU, Fauna
Cultural Heritage	Registered and Unregistered Cultural Heritage Sites	Kıranyer (Mezargedik) Cemetery (unregistered) Hasan Dede Cemetery (unregistered) Karacaören Cemetery (unregistered)
Socio-Economic Environment	Land and Assets	People who will lose their lands and assets located on the lands
	Economy	Livestock Activities Industrial activities and employment
	Quality of Life	Access to healthcare, education, commercial facilities, natural water resources, infrastructural services
Community Health & Safety	Safety from blade and ice throw and shadow flicker risk	Nearby settlements
	Aviation	Helipads nearby
	Traffic Safety	Kuyucak-Tavas Road

Within the scope of the CIA, a variety of methods were used to assess the foreseen impacts on VECs. These methods encompass spatial analysis using geographical information systems (GIS).

Several projects have been evaluated as part of the cumulative impact assessment including mining projects, wind power plants, and geothermal power plants of which details are provided in Table 3.6.

Table 3.6: Details of Existing and Planned Activities and Environmental Drivers

Name	Activity	Capacity	Distance to WPP License Area	Project Owner	Status
Denizli WPP	Wind Power Plant	22 Turbines, 66 MWe	Next to WPP License Area	Akfen Energy	Existing
Ronimart Mining	Marble Quarry	226.682 ha	~17 km	Ronimart Minng	Existing
Cekicler Marble	Marble Quarry	141.870 ha	~20 km		Existing
Nazilli-Kizildere ETL	Electricity Transmission Line	154 kv	~10 km	TEIAS	Existing
Kizildere-Sarakoy ETL	Electricity Transmission Line	154 kv	~11 km	TEIAS	Existing

Impact assessment:

By considering these criteria in the cumulative impact assessment process, significance of each concern on VECs was assessed as below:

- Considering the fact that the identified environmental drivers are existing structures and no planned activity had been determined within the boundaries of Cumulative AoI, no additional land loss is foreseen except for Hacıhıdırlar WPP. Nevertheless, the marble quarries are located near the forest areas and there is a possibility for them to expand. Still no interaction with the Project is expected as the distance between the WPP License Area and the quarries are too far (approximately 20 km).
- The cumulative impact on air emissions, noise will also be negligible as the identified VECs area located far from the drivers and currently no significant concern is in question.
- Habitat loss and fragmentation, migration route changes due to avoidance, and collision risks on birds and bat species are expected to increase cumulatively with the enhancement of WWP in the region. Following the 2024 studies, Project impacts will be assessed in more detail via updated CHA, a Project specific BAP will be prepared if deemed necessary. The BAP will re-assess the risks arising from the cumulative impacts of the projects in terms of habitats/species identified as critical habitats and define net gain targets. A wider area than 15 km was assessed for migratory avifauna. Although the projects are associated with minor migration routes, the overlap with KBAs containing large bodied soaring trigger species, the presence of the project in relation to important wetlands in the western part of the projects and the increased barrier effect along a sensitive point on the transit route due to the high level of wind development in the Çanakkale region have cumulatively led to the collision risk being assessed as moderate to high. However, the lack of an inventory of species in the area does not allow for a detailed assessment. Therefore, a regional impactassessment was carried out at high level. Project spesific collision risk assessment will be conducted after 2024 site survey. Development each of 9 WPP Project collision risk assessment will inform this collision risk at regional level. BAP will cumulatively include this assessment.
- As there are no expected future developments in the near vicinity of identified registered and unregistered cultural heritage sites other than the Project, no significant cumulative impacts on the cultural heritage sites are expected.
- Residents who may be experiencing economic displacement deriving from expropriation/urgent expropriation activities of both the Project and Akfen Denizli WPP need to be assessed since this may create a cumulative impact. On the other hand, since no grievances regarding the quality of life deriving from the activities of nearby facilities were received during the consultations with the local community members in December 2023, no cumulative impacts on the local community members' quality of life are anticipated to occur.

It is also estimated that the Project-related impacts on quality of life will not interact with or trigger the other investments around the region.

- As there is not any concern or grievance regarding ice throw and considering the fact that the nearest settlements are located far away from the critical distance of any wind turbine, no cumulative impact on ice & blade throw is expected. Additionally, no observation or grievance regarding any shadow flicker is in question. No impact on aviation is expected as there are no major aviation areas nearby. No additional impact on traffic is expected either. Moreover, as the distance between the WPP Turbines and helipad areas are too far, no cumulative impact is foreseen.

Mitigation Measures

This ESIA Report's chapters separately define mitigation strategies at the project level. Collaborative participation in regional management strategies will be required when project-specific mitigation measures prove insufficient and project mitigation alone is unable to avert an undesirable cumulative impact¹⁴. The IFC suggests taking the following particular steps, which might be necessary to manage cumulative impacts in an efficient manner:

- Adaptations to the project design (where possible, timing, location, and technology) to prevent cumulative impacts
- Project mitigation techniques, such as adaptive management techniques, are used to reduce cumulative impacts.
- Project impacts mitigated by other projects (not managed by the proponent to further reduce impacts on VECs).
- Protection and improvement through cooperation in other regional programs for cumulative effect management.
- Participation cooperatively in other regional strategies for managing cumulative impact.
- Taking part in regional monitoring programs to evaluate the effectiveness of management initiatives and the realized cumulative impacts.

Enerjisa Üretim will be responsible for being included within the collaboration regarding the cumulative impact management process. Enerjisa Üretim will ensure that all stakeholders identified during stakeholder management studies are informed about the progress of project operations.

3.17 Stakeholder Engagement, Information Disclosure and Consultation

A SEP has been developed, outlining the identification of project stakeholders and detailing past and future consultation activities that the Project Company is planning. The SEP also establishes a grievance mechanism accessible to both internal and external stakeholders. Mott MacDonald Social Team conducted a site visit on 08 December 2023 within the scope of the ESIA study of the Project. Out of the five Project-affected neighbourhoods, only one was visited by the Consultant as a part of the site visit conducted in December 2023. The aim of the site visit included collecting baseline data about the Project affected neighbourhoods, understanding the Project-related concerns and expectations of the PAPs, reflecting the views of key stakeholders, and identifying vulnerable groups. In line with these aims, key district-level governmental bodies, mukhtars and local residents were consulted during the site visit in order to identify PAPs 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 public participation meetings (PPMs) were carried out in Aydın and Denizli provinces. Public participation meetings were planned on 17 December 2021 in Aydın, Karacasu District,

¹⁴ IFC's Good Practice Handbook Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets, 2013

Işıklar Neighbourhood and on 17 December 2021 in Denizli, Babadağ District, Kiranyer Neighbourhood.

The Project Company will make available a comprehensive disclosure package on their website. This package will consist of the Final Draft ESIA Report, the SEP, the NTS¹⁵, Resettlement Framework (RF), stand-alone CHA, Framework BAP, summary of HRIA (Human Rights Impact Assessment), and summary of Climate Change Risk Assessment (CCRA) all provided in both English and Turkish. The primary goal is to allow Project stakeholders to examine the findings of the ESIA study and provide their feedback and inquiries. The disclosure period for this information will span 60 days. In addition, during the resettlement specific disclosure and consultation meetings, Project-specific RAP will be disclosed to the PAPs directly affected by the Project.

The documents in the disclosure package will be 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.

The main point of contact for the Project stakeholders will be the CLO. Accordingly, disclosure, consultation and engagement activities of the Project will also be managed by the CLO on the basis of the stakeholder engagement and consultation program defined in the SEP. The Project Company will be involved in the stakeholder engagement and consultation activities when necessary. The CLO will also be responsible for registering the stakeholder engagement and consultation activities into the Project-specific consultation log.

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. The mechanism includes anonymity, confidentiality and transparency principles and accessible for both internal and external stakeholders.

The channels listed below can be used for receiving grievances. 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
- This information is not yet available for the Project since there is no active administration office. The information will be included when the office is determined.]
- Phone number of the Head Office: (0216) 512 40 00
 - Project e-mail address: yekares2@enerjisauretim.com
 - Project website: <https://yekares2.enerjisauretim.com>
 - Posters that are hung in common areas of the Project affected neighborhoods (i.e., teahouses and/or mukhtars' offices), indicating what the clear communication channels are.
 - The grievance form disclosed on the Project website¹⁶ that enables anonymous grievance applications.

¹⁵ Summaries of the Climate Change Risk Assessment (CCRA) and Human Rights Impact Assessment (HRIA) that are conducted within the scope of the Project are covered as part of NTS.

¹⁶ The link of the grievance form on the Project website will be included once finalized.

Contact Details of the CLO

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

3.18 Human Rights Impact Assessment

HRIA is a systematic process designed to evaluate the potential effects of the Project and its activities, ensuring that they uphold and respect fundamental rights and freedoms. The methodology and scope of HRIA are essential components in identifying, assessing, and addressing human rights risks and impacts associated with various aspects the Project.

As demonstrated in Guidance Note on Implementation of Human Rights Assessments Under the Equator Principles, the interplay of the factors explained below analyzed for each human rights issue:

- **Scale:** This factor assesses how serious the impacts are for the PAP or victim. It considers the severity of harm caused by a violation of human rights.
- **Scope:** Scope evaluates the potential reach of the harm. It asks how many people could be affected by the violation. A broader scope indicates a higher risk.
- **Remediability:** Remediability focuses on whether a remedy can restore the victim to the same or an equivalent position before the harm occurred. It also considers the ease or difficulty of obtaining a remedy.
- **Likelihood:** Likelihood assesses the probability of the impact occurring. Higher likelihood increases the risk.

The scope of this HRIA encompasses a wide range of human rights considerations across different potential thematic areas:

Table 3.7: Hacıhıdırlar WPP Human Rights Issues

Human Rights Issue	Current - Residual Risk Ranking
Human Rights Category: Labour	
Supply chain management	Medium - Low
Child labour	Medium - Low
Collective bargaining and freedom of association	Low - Low
Forced labour	Low - Low
Grievance mechanism and remedy	Low - Low
Job security and right to work	Low - Low
Non-discrimination	Low - Low
Occupational health and safety	Medium - Low
Wages (pay equity, standard of living)	Low - Low
Working hours & overtime payments	Low - Low
Human Rights Category: Civil and political	
Freedom of expression	Low - Low
Privacy	Low - Low
Right to life and security of person	Low - Low
Human Rights Category: Economic, Social and Cultural	
Right to health	Low - Low
Right to water	Low - Low
Right to education	Low - Low

Human Rights Issue	Current - Residual Risk Ranking
Social insurance	Low - Low
Right to own property and right to own land	High - Low
Human Rights Category: Group Rights / Heightened Risk of Vulnerability	
Rights of persons with disabilities	Low - Low
Rights of older people	Low - Low
Rights of women	Low - Low
Rights of migrant workers and their families	Low - Low

Details of issues with medium and high human rights risks are summarised below.

Supply Chain Management

While considering suppliers involved in turbine production, steel production, and cement production is essential, the responsibilities of the Project Company and the EPC Contractor for the management of almost all of the labour-related human rights risks assessed under Labour should be clarified.

- Scale: High, as poor value chain management can lead to incidents or corruption.
- Scope: Applies to all supply chain workers and subcontractor companies. The scope is based on potential risks, with subcontractors not yet specified.
- Remediability: The Project Company has a Supplier Selection, Evaluation, and Management Plan requiring suppliers to have ISO certifications and Environmental and Social Management Systems. Human rights issues, such as health, safety, forced labour, and child labour, are addressed. Due diligence and quarterly reporting are conducted, but unknown subcontractors present management challenges.
- EPC Contractor’s Human Rights Code of Conduct includes:
 - Prohibits child labour.
 - Rejects forced labour and modern slavery.
 - Ensures no discrimination or harassment.
 - Mandates good working conditions and freedom of association.
 - Requires respectful use of security personnel and fair disciplinary measures.
 - Prioritizes occupational safety and health.
 - Avoids minerals from conflict areas.
 - Engages with local communities and prevents unlawful evictions.
- Likelihood: Medium. Plans are in place, but unknown subcontractors and international supply chains pose challenges.

Mitigation Measures / Remedies /Standard Controls

- Plans and procedures to be followed: Contractor Selection, Evaluation and Management Procedure, Local Content Procedure, Stakeholder Engagement Procedure
- Human Rights Due Diligence: Both the Project Company and the EPC Contractor will identify human rights risks in the supply chain, evaluating subcontractors on labour and materials before deals.
- Material Origin: Most materials for wind turbine production are initially exported from China. Special attention will be given to child labour, forced labour, and working conditions in mining.
- EPC Production Sites: Located in Germany, Poland, Portugal, Turkey, and in collaboration with China, India. Local legislation and gaps with international standards will be considered.

- Subcontractor Declaration: Upon identification, subcontractors must declare they do not use child labour or forced labour. Summary reports will be prepared on the supply chain management process.
- Grievance Mechanism: Follow-up on grievances and suggestions is mandatory, with responses within five business days, extendable if needed. Annual evaluations will include feedback from suppliers.

Child Labour

Since the supply chain consists of international companies operational in various countries, the assessment of the risk of child labour is of particular importance. Each internal stakeholder, in particular the EPC, should be assessed including those that are contracted to provide low-skilled roles, or from the suppliers of construction materials.

- Scale: High, as incidents could result in injury or death of a child.
- Scope: Individual children and their households could suffer from human rights abuses.
- Remediability: Primary supply chain companies will be screened for child labour policies and controls. Audits and inspections will be conducted to ensure no tolerance for child labour by the Project Company and EPC Contractor.
- Likelihood: Medium. Child labour is very unlikely due to existing controls, but ongoing monitoring is necessary.

Mitigation Measures / Remedies /Standard Controls

- No Child or Forced Labour Commitment: Fully enforce no child labour and forced labour policies during project construction, operation, and within the supply chain.
- Inspections: Expand work environment inspections to evaluate child labour risk in more detail.
- Awareness Gap: Contractors, subcontractors, and suppliers may lack knowledge of international labour standards. Risk assessments will be conducted for workers aged 15-18. The Project Management Team will maintain verified records, including birth dates, and monitor child labour through regular evaluations.
- Tracking and Auditing: Include feedback from internal and external stakeholders, including children and families. Conduct external social audits by a third-party, publish reports, and ensure compliance with the Project Company's Code of Conduct. Child labour should be detailed separately in supply chain due diligence reports, with particular attention to the raw material stage, especially cobalt production. Use ILO's Child Labour Guidance Tool for Business to guide audits.

Occupational health and safety

- Scale: High, as an occupational health and safety incident could result in injury or death.
- Scope: Human rights abuses could affect both workers and their households.
- Remediability: The Project Company has plans like the Community Health, Safety and Security (CHSS) Plan, EPRP, Traffic Management Plan, and Security Management Plan. Primary suppliers will be checked for effective task execution, proper PPE use, adherence to high-risk activity procedures, compliance with permit-to-work systems, emergency response measures, and medical evacuation facilities.
- Likelihood: Medium. Construction activities of subcontractors are considered as a potential risk since they cannot be monitored during the construction process.

Mitigation Measures / Remedies /Standard Controls

- When construction activities start with subcontractors, reports of OHS orientated inspections will be prepared and shared with relevant stakeholders.
- Near-miss incidents will be documented and presented as records.

- It is important to provide employees with comprehensive training and education on occupational health and safety practices, including the correct use of equipment, emergency procedures and hazard recognition. Awareness regarding near-miss incidents will be raised.

Right to own property and right to own land

- Scale: High. Construction requires areas on 87 parcels across five settlements, with 82 private and 5 public lands, causing several PAPs to lose land.
- Scope: 131 PAPs are owners/shareholders of private lands.
- Remediability: A Project-specific RAP identifies impacts on households due to land acquisition and expropriation, without physical displacement. Seven affected lands have structures, detailed in the RAP along with compensation amounts. Economic displacement compensations are covered in the LRP. The Project Company prioritizes consensual parcel acquisition, offering higher compensation than expropriation. The entitlement matrix in RAP outlines compensations and actions, clarified through fieldwork. Asset inventory and census studies are completed.
- In the light of the field work carried out within the scope of RAP and interviews with the owners whose lands are affected, land transactions in the Project do not create any risk of homelessness. No cases of physical displacement have been observed. There is no demolition of a structure where any PAP regularly resides. Therefore, there are no PAPs at risk of homelessness.
- Likelihood: High. Economic displacement will occur. Mitigation includes standard control measures in the RAP/LRP, landowner engagements, and a grievance mechanism.

Mitigation Measures / Remedies /Standard Controls

Plans and procedures to be followed: RAP/LRP, SEP, Community Grievance Mechanism

ESIA studies point out that there are structure owners whose structures are within the turbine setback area of the Project. However, it should be noted that no physical displacement is observed within the scope of the Project's resettlement field studies. Still, impact assessment studies have not been completed yet. Relevant revisions will be made once the identification and assessment of structures located in proximity to the turbines are completed.

4 Project Environmental and Social Management System

The primary aim for formulating and implementing the Environmental and Social Management Plan (ESMP) is to safeguard the environment, Project personnel and the local population against Project activities which may cause harm or nuisance. For the purposes of the ESMP, “management” will be the control or mitigation measures and procedures required in managing key environmental and social effects. In addition, the ESMP will outline monitoring requirements, and these will be defined as monitoring, measurement, site inspection and audit.

The ESMP will:

- Present the Lenders’ standards, guidelines and legal requirements that should be adopted during construction and operation (including any additional environmental permitting requirements) and also be structured in line with International Standardisation Organisation (ISO) Standards ISO 14001;
- Set out the institutional framework for implementing the measures including where further strengthening is required or where the proponent may be required to put additional measures in place;
- Describe the proposed measures, including their timing and implementation arrangement;
- Define responsibilities for implementing the proposed measures, including for monitoring and evaluation;
- Establish the environmental and social monitoring and evaluation plan for construction and operation phases;
- Identify monitoring activities and key performance indicators that the Project should aim to achieve;
- Present construction guidelines that address how contractors should incorporate environmental and social considerations in their overall work. These would be presented as an Environmental and Social Checklist during the construction phase; and
- Provide a framework for the management of emergency situations during construction and operation.

Further detailed sub-management plans that are listed below, will be developed for the construction and operation phases by the Consultant in accordance with the policies, guidelines and legislation.

The E&S management plans as well as corporate E&S Policies of Enerjisa Üretim will be communicated to and adopted by contractors. As such,

- Once the ESMP and sub-management plans are finalized, necessary clauses indicating the contractors' obligations to comply with these documents will be included in their contracts. Contractor Selection, Evaluation and Management Procedure will be applied.
- Sub-management plans will be included as appendix to their contract. They will be advised to either develop their own E&S management plans/procedures or comply with the Project Company's documents.
- On site implementation will be monitored by Enerjisa Üretim Team (inspections, audits, etc.) by adhering to the monitoring requirements specified in subject-specific management plans as part of the ESMS.

Trainings will be provided to both Enerjisa Üretim and contractors' personnel in order to increase the capacity and awareness.

The ESMS and specific management plans describes mitigation measures for impacts specific to project activities and discuss implementation mechanism. To conclude, the implementation of ESMS will help the Project Company in complying with national regulatory as well as to meet applicable international standards' requirements.

The ESMS plans and procedures which are prepared by the Consultant for both construction and operation phases of the Project are listed below.

- Landscape and Visual Impacts Management Procedure
- Noise Management Plan
- Biodiversity Management Plan
- Waste and Wastewater Management Plan
- Air Quality Management Plan
- Occupational Health and Safety Management Plan
- Community Health and Safety Plan
- Emergency Preparedness and Response Plan
- Cultural Heritage Management Plan (including Chance Find Procedure)
- HR & Worker Management Plan including Workers' Accommodation Plan
- Erosion Control Management Plan including Drainage and Sediment Management Procedure
- Water Quality Management Procedure
- Procurement and Local Content Procedure
- Contractor Selection, Evaluation and Management Procedure
- Security Management Procedure
- Traffic Management Procedure
- GHG Assessment Procedure
- Associated Facilities Management Procedure
- Change Management Procedure

