A large, solid orange graphic element on the left side of the page. It consists of a tall, narrow vertical rectangle at the bottom, which is topped by a wide, shallow triangle pointing to the right. The top edge of the triangle is horizontal, and the right edge is vertical, meeting the top of the rectangle. The overall shape resembles a stylized arrow or a modern architectural element.

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

Stakeholder Engagement Plan

June 2024

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Stakeholder Engagement Plan

June 2024

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Contents

List of Acronyms	vii
1 Introduction and Project Summary	1
1.1 Overview	1
1.2 Objectives and Scope of the Stakeholder Engagement Plan	5
1.3 Project Location and Social Area of Influence	5
1.4 Expected Project Impacts and Summary of Mitigations	6
2 Stakeholder Engagement Requirements	13
2.1 Overview	13
2.2 Applicable Guidelines and Standards	13
2.2.1 National Requirements	14
2.2.2 International Requirements	15
2.2.3 Applicable Policies and Management Systems of the Project Company	16
3 Stakeholder Identification and Analysis	18
3.1 Overview	18
3.2 Project Stakeholders	18
4 ESIA Consultation Activities and Outcomes	24
4.1 Overview	24
4.2 Previously Carried out E&S (Environmental and Social) Activities	24
4.3 Stakeholder Engagement Activities during ESIA	26
4.4 ESIA Public Disclosure and Consultation	27
5 Stakeholder Engagement Programme and Disclosure Process	29
5.1 Overview	29
5.2 Community Liaison Officer (CLO)	29
5.3 Stakeholder Engagement and Consultation Program	29
6 Project Grievance Mechanism	36
6.1 Overview	36
6.2 Principles of the Grievance Mechanism	36
6.3 External Grievance Mechanism	37
6.4 Internal Grievance Mechanism	38
6.5 Grievance Mechanism Channels and CLO Contact Details	39

7	Resources and Responsibilities	40
8	Monitoring and Reporting	41
9	Appendices	42
9.1	The Consultation Form of the Project Company	43
9.2	Project Consultation Log of the Project Company	44
9.3	Revised Project Grievance Register Form	45
9.4	Project Grievance Closure Form	46
9.5	Posters That Are Hung in Common Areas of The Project Affected Neighbourhoods	47
9.6	Stakeholder Request and Grievance Register Log of the Project Company for the Project	48

Tables

Table 1.1:	Summary of the Project's Social Impacts	7
Table 3.1:	External Stakeholder List for Governmental Authorities	18
Table 3.2:	External Stakeholder List for Non-Governmental Bodies	21
Table 3.3:	Other External Stakeholder Groups	21
Table 3.4:	Internal Stakeholder List	22
Table 5.1:	Stakeholder Engagement and Consultation Program Throughout the Lifetime of the Project	30

Figures

Figure 1.1:	Project Organisational Chart	4
Figure 6.1:	Steps of the External Grievance Mechanism Process	37

List of Acronyms

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

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

1 Introduction and Project Summary

1.1 Overview

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

Hacıhıdırlar Wind Power Plant (WPP) Project (“the Project”) with 15 turbines and 63 MW_m/ 63 MW_e total installed power, is planned to be established by Enerjisa Üretim in Aydın Province, Karacasu District, Karacaören and Ataköy neighbourhoods: Denizli Province, Sarayköy and Babadağ District, Kıranyer, Yeşilyurt and Hisar Neighbourhoods. The Project components consist of 15 turbines, a switchyard, a total of 17,727 m Project roads which is planned to be constructed (i.e., access and site roads) and a 154 kV single-circuit transmission line of approximately 12.5 km for connection to Denizli Transformer Substation (TS), which is currently operated by TEIAS. The Project is part of a nine-project wind energy investment package initiated by Enerjisa Üretim which has a 750 MW total installed power from a total of 180 wind turbines located in Aegean and Marmara Regions of western Turkey; aiming to evaluate and utilize the wind energy potential of the region and contribute to the national strategy and regional economy.

The Project area is one of the areas declared² as a YEKA within the scope of the YEKA Regulation³. The Project Company has secured the preliminary license valid for 24 months for securing the required permits for the Project. The construction period of the Project will be 13 months and the operation period will be 49 years as stated in the National Environmental Impact Assessment (EIA) Report. The construction of the Project will be initiated in the fourth quarter of 2024 with the construction of Project roads and is planned to be completed by the fourth quarter of 2025. The Project is subject to conducting National Environmental Impact Assessment (EIA) Study in regard with the Regulation on Environmental Impact Assessment⁴ of Türkiye. In this sense, a National EIA Report was prepared for the Project by an environmental consultancy company, namely Nartus (with a competency certificate dated January 2025 and numbered 267). The Final National EIA Report was submitted in March 2023 by Nartus. Upon submission of the Final National EIA Report to the Ministry of Environment, Urbanization and Climate Change (MoEUCC) General Directorate of Environmental Impact Assessment, Permit and Inspection, the “EIA Positive” decision for the Project was secured on 03 April 2023 by the MoEUCC. However, 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 03 April 2023 for the Project. The discovery was made by the Experts elected on 06 July 2023, and the Experts Opinion Report was prepared and submitted to the file on 11 November 2023. The issues subject to the court case and the Expert Opinion Report are provided in the Environmental and Social Impact Assessment (ESIA) Report in detail, which is prepared to

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

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

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

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

identify the impacts that are likely to occur due to implementation of construction and operation activities under the Project, and to comply with the requirements set by the International Financial Institutions (IFIs). 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 Experts Report to the Presidency of the Aydın 2nd Administrative Court. The Consultant received the case files from Enerjisa Üretim on 03 January 2024.

According to the last information shared by the Project Company with the Consultant after the annulment of the National EIA Positive decision, the Project Company was conducting additional studies due to the lawsuit and these studies will be added as additional assessments to the National EIA and will be seeking approval for the revised National EIA. Project Company reported that a positive decision on the revised National EIA could be taken in July 2024 from MoEUCC.

During the 24-month pre-licence period, which is currently ongoing, the nominal power of used proposed wind turbines as well as the location of several wind turbines has changed in accordance with the official opinions of relevant authorities, leading to a change of the Project installed power capacity. Upon this change, a request was submitted to the MoENR for the revision of pre-licence in regard with the change in the Project design and the revised pre-licence was secured. According to this change, the Project will consist of 15 wind turbines, each with a unit power of 4.2 MW_m/4.2 MW_e; and it is projected that the WPP will have a 253,118,250 kWh/year of annual electricity generation capacity with a total installed power of 63 MW_m/ 63 MW_e. Detailed information on design changes is provided in the ESIA Report. The ESIA for the Project aims to ensure that the Project is developed and operated in an environmentally and socially responsible manner, minimising or eliminating adverse impacts and maximizing positive contributions to the surrounding communities and the ecosystem.

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

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

The Project includes several parties involved within various Project-related activities. In this sense, as well as its own Project team, the Project Company has appointed several consultancy companies to support during the National EIA process. The consultancy activities include social studies undertaken by Adam & Smith, and environmental monitoring studies for the National EIA undertaken by Nartus. The social consultants have regularly visited the mukhtars and residents of the neighbourhoods for approximately two years (between June 2021 and September 2023) that are in close proximity to the Project area.

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

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

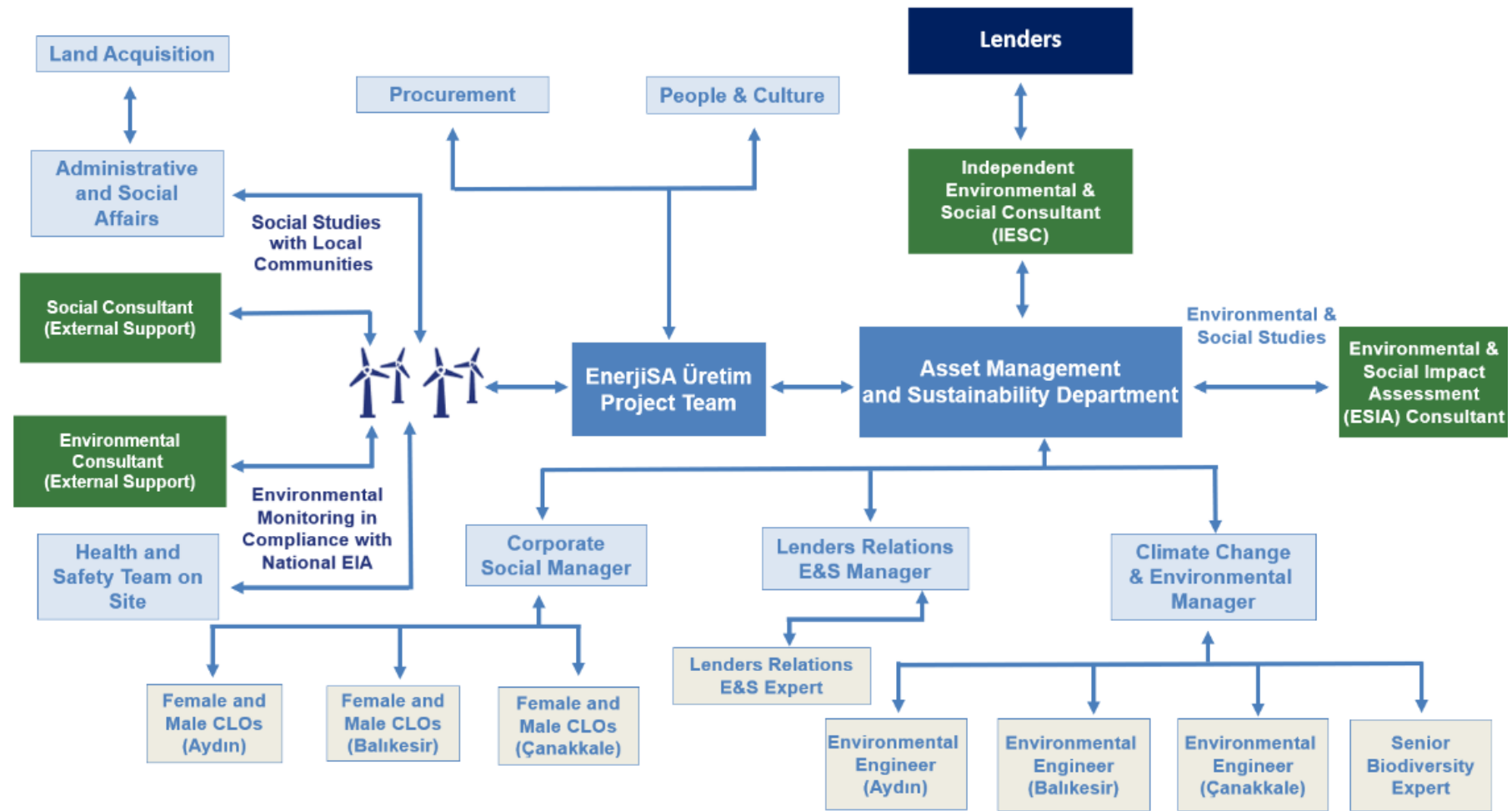


Figure 1.1: Project Organisational Chart

Source: EnerjiSA Üretim

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

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

1.2 Objectives and Scope of the Stakeholder Engagement Plan

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

The SEP defines the stakeholder engagement activities to be organized, grievance mechanism to be applied, and the Project personnel responsible for the overall SEP implementation. During the definition of these Project-specific components, the temporary SEP, which has been prepared prior to the ESIA process and in place since October 2023, was utilized. The temporary SEP includes information about the previous stakeholder engagement activities and describes the future engagement requirements as well as the grievance mechanism, all of which are covered in the subsequent parts of this SEP. As per the temporary SEP and other related documents of the Enerjisa Üretim, the stakeholder engagement activities conducted so far have followed a local community member-centred and structured framework in line with the international requirements. The same approach will continue to be applied on site throughout the Project lifecycle. The Project Company is committed to actualize effective stakeholder engagement as defined in this SEP and in line with the IFC PS1, EBRD PR10, EP IV Principles and 5 and 6, and DFC ESPPs 3 and 5 requirements. The Project Company is also committed to follow the Turkish EIA Regulation (OG Date/Number: 29.07.2022/31907), Law on Right to Information (No. 4982), Law on Preservation of Personal Data (No. 6698), Law on Use of the Right to Petition (No. 3071), and Regulation on the Principles and Procedures for the Enforcement of the Law on the Right to Information in order to achieve an effective SEP. This SEP will be revised with the outcomes of the public participation meeting that will be conducted after the Final Draft ESIA Report is prepared and disclosure package of the Project is shared with the public.

1.3 Project Location and Social Area of Influence

The social area of influence (Aol) of the Project covers a total of five neighbourhoods in Karacasu district in Aydın province and Sarayköy and Babadağ districts in Denizli provinces according to the desktop studies. These are the nearest settlements to the Project area

⁵ The Project Company requires compliance with EBRD requirements.

including Karacaören and Ataköy neighbourhoods in Karacasu district, Hisar and Yeşilyurt neighbourhoods in Sarayköy district and, Kıranyer neighbourhood in Babadağ district.

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

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

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

- Neighbouring communities located in the close proximity of the Project area that are likely to be exposed to noise and visual impacts,
- Residents located approximately 2 km to 4 km distant from the nearest turbines to their neighbourhoods (This group needs to be considered during the construction phase as such the residents use the lands as pasture for animal husbandry activities in the neighbourhood. It is likely that there will be traffic volume increase and dust generation on the main roads used to access the neighbourhood, especially during the construction phase),
- Local community members who may benefit from the Project's local employment opportunities,
- Business enterprises that may benefit from the Project's local economic activities,
- Vulnerable groups who may be in need for essential consultation in the Project, and
- All operation phase workers employed within the scope of the Project (including subcontractors).

1.4 Expected Project Impacts and Summary of Mitigations

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

Table 1.1: Summary of the Project’s Social Impacts

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

Impact Topic	Impact Description	Receptor	Phase of the Project	Mitigation Measures
				<ul style="list-style-type: none"> Road safety, traffic regulations and speed limit trainings for workers within and near the Project area SEP, continuous consultation, and engagement through the CLOs Community grievance mechanism
	<p>Educational institutions take a significant place for the Project Company in terms of corporate social responsibility activities and collaboration (i.e., student visits to the Project, renovation of the schools). The Project may lead students to receive further opportunities in access to education.</p>			<ul style="list-style-type: none"> Evaluating collaborative activities as corporate social responsibility strategy SEP, continuous consultation, and engagement through the CLOs Community grievance mechanism
	<p>During the operation phase, the turbines will produce noise from their mechanical and electrical components, as well as from the aerodynamic effects of the blades. Students whose schools and/or houses are close to the turbines may be affected from the noise during the operation phase.</p>		Operation	<ul style="list-style-type: none"> Noise Management Plan (NMP) SEP, continuous consultation, and engagement through the CLO Community grievance mechanism Operational maintenance procedures
Land Use, Physical and Economic Displacement	<p>The land acquisition works of the Project is in progress. The lands planned to be acquired for expansion are used for generally agricultural purposes. Therefore, local community members who lose their agricultural or pasture lands may be impacted economically since their livelihood activities become limited or totally lost. Physical displacement has been avoided and is not expected within the scope of the Project.</p>	Local community members whose lands are acquired-expropriated	Construction	<ul style="list-style-type: none"> SEP, continuous consultation, and engagement through the CLOs Community grievance mechanism Resettlement Action Plan Land Acquisition Procedure
Local Economy, Livelihood Sources and Employment	<p>It is important to consider the harvest and cultivation dates of the agricultural products to reduce the risk of dust and loss of livelihood during the construction activities.</p>	Local community members whose livelihoods are based on agriculture	Construction	<ul style="list-style-type: none"> SEP, continuous consultation, and engagement through the CLOs Community grievance mechanism Resettlement Action Plan Air Quality Management Plan
	<p>The contractors and subcontractors of the Project will employ the local unskilled and semi-skilled workforce. This can contribute to a certain</p>	Local community members / Local		<ul style="list-style-type: none"> Local employment and procurement strategy

Impact Topic	Impact Description	Receptor	Phase of the Project	Mitigation Measures
	reduction in unemployment and increase in the welfare of the employed workers' families.	communities / Project affected neighbourhoods		<ul style="list-style-type: none"> • SEP, continuous consultation, and engagement through the CLOs
	During the construction phase of the Project, there will be numerous procurement opportunities which may be beneficial for the local businesses, enterprises, and suppliers in terms of income generation and increase.	Local community members / Local businesses, enterprises, and suppliers		<ul style="list-style-type: none"> • Resettlement Action Plan • Community grievance mechanism • Local Content and Procurement Procedure (LCPP)
	There are pasture lands where the Project is located. Main concerns reported by the consulted Local community members were about the loss of income for the households whose livelihood is based on animal husbandry. However, the turbine areas will not be fenced, which will enable the herds to be grazed.	Local community members whose livelihoods are based on animal husbandry	Operation	<ul style="list-style-type: none"> • SEP, continuous consultation, and engagement through the CLOs • Resettlement Action Plan • Community grievance mechanism • Security Management Plan
Infrastructural Services	The operation of infrastructure facilities (i.e., residents' access to local community infrastructures such as schools and mosques, access to irrigation systems, water resources and agricultural infrastructure) is of great importance for the people living in that region to continue their daily lives. However, local community members and mukhtars of the neighbourhoods did not report any concern related to these potential impacts. Consideration will be given to ensuring that the infrastructure system is operational throughout the construction period.	Local community members / Project affected neighbourhoods	Construction	<ul style="list-style-type: none"> • SEP, continuous consultation, and engagement through the CLOs • Community grievance mechanism • Correspondence with governmental institutions when necessary (i.e., for water, road, transportation issues) • Community Health, Safety and Security Procedure • Traffic Management Plan
Gender	The Project may improve the gender equality through local employment of both women and men residing in the Project affected neighbourhoods. Land acquisition activities will be conducted with the equity and equality perspective, in which all Local community members are approached without any discrimination due to their gender and other characteristics. The potential influx of male workers into neighbourhoods due to the Project construction activities has various impacts on women's daily	Local community members	Construction	<ul style="list-style-type: none"> • Trainings and Code of Conduct for workers • Awareness raising activities for the Project affected neighbourhoods • Specific meetings with women in the Project affected neighbourhoods • SEP, continuous consultation, and engagement through the CLOs • Community grievance mechanism • Community Health, Safety and Security Procedure

Impact Topic	Impact Description	Receptor	Phase of the Project	Mitigation Measures
	<p>lives and livelihood activities, which should be considered when discussing gender and vulnerable groups. Increased congestion and noise are not expected to disrupt women's daily routines, including household chores, childcare responsibilities, and access to community resources.</p> <p>Throughout the construction activities, gender-based violence and harassment (GBVH) cases may occur unless preventive measures are taken.</p>			<ul style="list-style-type: none"> Company GBVH Policy
Vulnerable Groups	<p>All construction activities will be carried out considering the vulnerabilities of existing groups (i.e., the elderly local community members, local community members with chronic health problems like asthma) to prevent their daily life practices and/or access to certain services (i.e., health facilities in the district) to be affected disproportionately and negatively due to Project impacts.</p>	Local community members who are in a more disadvantaged position	Construction	<ul style="list-style-type: none"> Trainings and Code of Conduct for workers SEP, continuous consultation, and engagement through the CLOs Community grievance mechanism Community Health, Safety and Security Procedure

Source: Draft ESIA Report of the Project

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

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

Since the route and location of the poles and ETLs are not certain, expropriation activities will become clear in later stages of the Project. Therefore, there is no information regarding ETL-based expropriation activities within the scope of this Draft SEP. Further assessments will be made for both the pylon points and the line route once the land acquisition procedures on the parcels to be affected by the ETL construction are finalised. In the Resettlement Action Plan (RAP) to be prepared, a framework to ETL construction will be presented and potential entitlements will be revealed.

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

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

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

Assessments for blade throw risks show that even during more extreme weather conditions resulting in higher wind speed, the maximum throw distance can be expected to be less, and the probability of a blade throw risk is significantly small. In this regard, 16 structures were identified within the setback distances for blade throw risks; additionally, blade loss risks were evaluated for average and maximum wind speed, and it was discovered that there are 13 structures within the average and six structures within the maximum wind speed throw zones. To conclude, the receptor sensitivity of blade throw can be assumed to be medium as the existence of the structures within the risk zones. Considering the low probability and expected small throw distance, the impact regarding blade throw is considered to be negligible for average distance and maximum distance which makes overall impact magnitude minor for both

distances. Hence no physical displacement is in question as no significant blade throw risk is in place.

ESIA ice throw assessment studies of the Project show that there are 16 structures within the ice throw distance being the closest one is 80 m distance to the nearest turbine which makes the impact magnitude major and receptor sensitivity medium. Hence, the overall impact significance can be considered as major.

Mitigating the risks associated with blade and ice throw incidents involves the implementation of advanced technologies and operational controls. Utilizing sensors and monitoring systems enables real-time tracking of ice accumulation on turbine blades, allowing for timely intervention to prevent ice throw. Adjusting operational parameters during icy conditions and employing technologies like de-icing systems contribute to minimizing the risks associated with blade and ice throw incidents. Furthermore, the Community Health and Safety Plan and Emergency Preparedness and Response Plan, which include the necessary protocol for responding to any occurrences, will be followed as part of the mitigating measures.

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

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

2 Stakeholder Engagement Requirements

2.1 Overview

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

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

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

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

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

2.2 Applicable Guidelines and Standards

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

2.2.1 National Requirements

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

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

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

The issues reported by the participants of the meeting are documented in the official meeting minutes to be considered and addressed in the EIA document. In addition, the institutions authorized by the Ministry of Environment, Urbanization and Climate Change (MoEUCC) prepare a SEP in order to inform the public about the project and its impacts, and to facilitate receiving the opinions and suggestions of the public regarding the project. However, this regulation is effective as of July 2022 and the public participation meeting of the project subject to the EIA process was held in December 2021. Therefore, it is exempt from the requirement to prepare a SEP within the scope of the EIA process.

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

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

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

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

Law on the Right to Information (No. 4982)

Law on the Right to Information regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government.

Law on Preservation of Personal Data (No. 6698)

The purpose of this Law is to protect the fundamental rights and freedoms of individuals, especially the privacy of private life, in the processing of personal data and to regulate the obligations of real and legal persons processing personal data and the procedures and principles to be followed.

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

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

2.2.2 International Requirements

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

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

engaging with the Local community members and communities through meaningful consultation, and disclose relevant information throughout the planning, implementation, monitoring and evaluation of land acquisition, and resettlement process including livelihood improvement. The Client should ensure that all groups, including the vulnerable are informed and made aware of their entitlements, rights, opportunities, and benefits.

- Performance Requirement 10 - Information Disclosure and Stakeholder Engagement: PR 10 recognises the significance of a transparent engagement with relevant stakeholders (especially those defined as vulnerable groups within the scope of the Project) and disclose appropriate Project information throughout the lifetime of the Project. Providing an accessible grievance mechanism as a part of the stakeholder engagement is crucial for building strong, constructive, and responsive relationships which are essential for a successful environmental and social impacts management within the Project.
- Equator Principles IV (2020)
 - Principle 5 - Stakeholder Engagement: Principle 5 recognizes that for all Category A and Category B projects, the EPFI will require the client to demonstrate effective stakeholder engagement, as an ongoing process in a structured and culturally appropriate manner, with affected communities, workers and, where relevant, other stakeholders.

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

2.2.3 Applicable Policies and Management Systems of the Project Company

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

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

- ISO 9001: 2015 - Quality Management System
- ISO 14001: 2015 - Environmental Management System
- ISO 45001: 2018 - Occupational Health and Safety Management
- ISO 50001: 2018 - Energy Management System
- ISO/IEC 27001: 2013 - Information Security Management System
- ISO 55001 – Asset Management System

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

Corporate level:

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

Project Specific:

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

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

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

⁶ <https://www.enerjisaretim.com.tr/>

3 Stakeholder Identification and Analysis

3.1 Overview

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

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

3.2 Project Stakeholders

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

Table 3.1: External Stakeholder List for Governmental Authorities

GOVERNMENTAL BODIES

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

GOVERNMENTAL BODIES

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

GOVERNMENTAL BODIES

Level	Organization	Relation to the Project	Level of Interest
	Denizli Metropolitan Municipality, Directorate of Transportation		High
	Denizli Metropolitan Municipality, Directorate of Culture and Social Works		
	Denizli Metropolitan Municipality, Directorate of Civil Works		
	Aydın Governorship Provincial Directorate of Social Security Institution	These organizations may provide specific views on labour and working conditions, and health and safety of facility personnel.	Low
	Denizli Governorship Provincial Directorate of Social Security Institution		
	Aydın Governorship Provincial Directorate of Environment, Urbanization and Climate Change (PDoEUCC)	PDoEUCCs of the provinces have regulatory functions related to the Project such as environmental impact assessment permits and environmental permitting.	High
	Denizli Governorship Provincial Directorate of Environment, Urbanization and Climate Change (PDoEUCC)		
	Aydın Provincial Directorate of Environment and Urbanization	These organizations have regulatory functions in relation to the Project such as environmental impact assessment permits and environmental permitting.	High
	Denizli Provincial Directorate of Environment and Urbanization		
	Aydın Regional Council for the Conservation of Cultural Property	These organizations are important stakeholders to identify and clarify the archaeological potential of the Project area.	High
	Aydın Afrodiasias Museum Directorate		
	Denizli Museum Directorate		
	Aydın Provincial Directorate of Agriculture and Forestry	These organizations may provide provincial-specific and/or site-specific views on the Project.	High
	Denizli Provincial Directorate of Agriculture and Forestry		
	Aydın Provincial Command of Gendarmerie	These organizations may provide provincial-specific and/or site-specific views on the Project.	Medium
	Denizli Provincial Command of Gendarmerie		
	Aydın General Directorate of Water and Sewerage Administration (ASKI)	These organizations may provide an opinion related to water/wastewater infrastructure of the Project area.	Medium
	Denizli General Directorate of Water and Sewerage Administration (DESKI)		
	The District Governorship of Sarayköy, The Municipality of Sarayköy	The Project area is located in Sarayköy (Denizli), Karacasu (Aydın) and Babadağ (Denizli) districts and the local governorship, the central municipality and their related departments are stakeholders regarding obtaining relevant permits, approvals during planning, and construction and operation phases of the Project.	High
	Directorate of Zoning and Urbanisation		
	Directorate of Civil Works		
	Directorate of Transportation		
	Directorate of Cleaning Works		
	Directorate of Municipal Police		Medium
	Sarayköy District Directorate of Health		Medium
	Sarayköy District Gendarmerie Command		High
	Sarayköy District Directorate of Agriculture and Forestry		High
	The District Governorship of Karacasu, The Municipality of Karacasu		
	Directorate of Zoning and Urbanisation		
	Directorate of Civil Works		
	Directorate of Plan and Project		
	Directorate of Cleaning Works		Medium
	Directorate of Municipal Police		
	Karacasu District Directorate of Health		
	Karacasu District Gendarmerie Command	Medium	
	Karacasu District Directorate of Agriculture and Forestry	High	
	The District Governorship of Babadağ, The Municipality of Babadağ	High	

GOVERNMENTAL BODIES

Level	Organization	Relation to the Project	Level of Interest
	Directorate of Civil Works		High
	Directorate of Municipal Police		
	Babadağ District Gendarmerie Command		Medium
	Babadağ District Directorate of Agriculture and Forestry		High

Table 3.2: External Stakeholder List for Non-Governmental Bodies

NON-GOVERNMENTAL BODIES

Level	Organization	Relation to the Project	Level of Interest
National, Provincial and District	Turkish Wind Energy Association	These foundations, associations, and chambers may provide their specific views related to the Project	High
	Türkiye Foundation for Combating Erosion, Afforestation and Protection of Natural Assets (TEMA)		
	Environmental Protection and Research Foundation (ÇEV-KOR)		
	Turkish Environmental Protection Foundation (TUÇEV)		
	Turkish Nature Conservation Association		
	Foundation for the Protection and Promotion of Environmental and Cultural Values (ÇEKÜL)		
	World Wide Fund for Nature (WWF) Türkiye		
	Bird Life International Türkiye Partner- Doğa Association		
	The Nature Conservation Centre		
	Resource, Environment and Climate Association (REC)		
	Ecological Research Society (EKAD)		
	Greenpeace Akdeniz Türkiye		
	Association for Sustainable Economics and Finance Research (SEFiA)		
	Elderly Rights Association		
	Elderly Policy Association		
	Aydın Chamber of Agriculture		
	Aydın Chamber of Tradesmen and Craftsmen		
	Aydın Chamber of Agriculture		
	Kuşadası Ecosystem Protection and Nature Lovers Association		
	Karacasu Aphrodisias Potters Production and Marketing Co-Operative		
Karacusu Agricultural Credit Cooperative			
Denizli Chamber of Commerce			
Denizli Chamber of Tradesmen and Craftsmen			
Denizli Chamber of Agriculture			
Denizli Humanitarian Aid Association			
Saraykoy Agricultural Credit Cooperative			

Table 3.3: Other External Stakeholder Groups

STAKEHOLDER GROUPS

Level	Group	Relation to the Project	Level of Interest
Mukhtars/Residents/Local Communities	The mukhtars and residents at Karacaören, Ataköy, Hisar, Yeşilyurt and Kıranyer neighbourhoods	Neighbourhoods are key stakeholders considering potential impacts of the Project.	High
	Local Businesses and Enterprises (Local shops, beekeepers, income-generating agricultural lands)		
	Structure owners whose structures are within the turbine setback area of the Project		

STAKEHOLDER GROUPS

Level	Group	Relation to the Project	Level of Interest
Vulnerable/ Disadvantaged Groups	Local communities including PAPs subject to direct land acquisition	Vulnerable groups are key stakeholders considering potential impacts of the Project.	High
	Women		
	The landless/homeless people		
	The elderly		
	People with disabilities		
	Unemployed people		
Media	Seasonal workers	It is important to engage with local and regional media organizations for effective public disclosure and consultation.	Medium
	Local, regional, and social media (including but not limited to the following newspapers, TV stations, social media channels):		
	• Ege News		
	• Son Mühür Newspaper		
	• Aydın Voice Newspaper		
	• Manşet Aydın Newspaper		
	• İz Newspaper		
	• Aydın TV		
	• Denizli News		
	• Denizli 24 News		
• Pamukkale Newspaper			
• DRT TV			
Universities	Aydın Adnan Menderes University	Universities are one of the key stakeholders when research needs to be conducted within the scope of the Project.	Medium
	Pamukkale University		
Other potentially affected local social institutes	Karacasu District State Hospital	It is essential to ensure that the social environments that pose a significant place for community health, safety and security issues (i.e., hospitals, fire stations) and/or where key stakeholders utilize/ spend their time are operating properly at every stage of the Project.	Medium
	Sarayköy District State Hospital		
	Sarayköy Police Headquarters		
	Saraykoy Vocational School		
	Aksaz Primary School		
	Saraykoy Hacı İrfan Mersin Middle School		
	Işıklar Primary School		
	Ataköy Primary School		
	Saraykoy Family Health Center		
	Karacaören Primary School		
	Sarayköy Firestation		
	Mosques		
	Local Coffeeshops		
Fire Watchtowers near the Project affected neighbourhoods			

Table 3.4: Internal Stakeholder List

INTERNAL STAKEHOLDERS

Level	Organization	Relation to the Project	Level of Interest
Internal Stakeholders	Project staff	These groups are one of the key stakeholders in terms of continuation of the Project activities in compliance with the international standards.	High

INTERNAL STAKEHOLDERS

Level	Organization	Relation to the Project	Level of Interest
	Contractors and subcontractors and their employees		High
	Suppliers and their workers		

4 ESIA Consultation Activities and Outcomes

4.1 Overview

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

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

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

Correspondence / Opinion Letters

The names of the authorities, which were communicated for their opinions on the Project during the National EIA process, are shared below:

- Ministry of Environment, Urbanization and Climate Change,
 - General Directorate of the Protection of Natural Assets
- Ministry of Agriculture and Forestry
 - General Directorate of Agricultural Research and Policies
- Ministry of Culture and Tourism
 - General Directorate of Cultural Assets and Museums
- General Directorate of Highways 2nd Regional Directorate
- Energy Market Regulatory Authority
- Aydın Governorship Directorate of Investment Monitoring and Coordination
- Aydın Governorship Provincial Agriculture and Forestry Directorate
- Denizli Governorship Provincial Agriculture and Forestry Directorate
- Aydın Governorship Provincial Disaster and Emergency Directorate
- Denizli Governorship Provincial Disaster and Emergency Directorate
- Sarayköy Municipality, Directorate of Zoning and Urbanization
- Karacasu Municipality, Directorate of Zoning and Urbanization
- Karacasu Municipality, Directorate of Cleaning Affairs
- Babadağ Municipality

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

- Ministry of Energy and Natural Resources, General Directorate of Mining and Petroleum Affairs, Special Areas and Map Department has emphasized that, the examination of the Project area 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 be obtain relevant Governorship opinion.

- General Directorate of Highways 2nd Regional Directorate approval has been granted provided that Project area does not intersect with the routes within the responsibility of the Authority. In addition, within the scope of the Project activities, it was specified in the Authority's internal directive that "the minimum distances that wind energy power plants should have to the highway boundary line are as follows: on highways ... $B: 1.5 * (H+L)$; on State and Provincial Roads ... $B: 1.25 * (H+L)$, B: distance (m), H: tower height (m), L: blade length (m)." It was emphasized that these minimum distances should be adhered to, transportation within the Project should be carried out in accordance with the 2918 Road Traffic Law, and the permits specified in the legislation should be obtained in advance for such transportation. It was also required that no new connections to the roads should be established, except for the existing connections within the Project area. Furthermore, if a connection is to be made from the Project area to a public road, it is necessary to apply to the Authority with detailed projects, taking into account the provisions of the 2918 Road Traffic Law and the regulations issued in connection with it.
- Denizli Metropolitan Municipality, Directorate of Zoning and Urbanization was notified that the turbine locations and the central area of the power plant were situated in areas designated partly as agricultural land, forest land and key biodiversity area in the 1/25,000-scale master zoning plan prepared by the Municipality. It was also reported that the corresponding scale plans were not available. If there is a need to obtain a detailed zoning plan for the master zoning plan, it was required to pay the fee specified in the 2022 fiscal year fee schedule to the relevant department.
- 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. Furthermore, in the examination carried out by the Earthquake Risk Management and Urban Improvement Department; there is a risk of landslides in the Project Area due to the characteristics of the land, therefore necessary precautions must be taken. In the examination carried out by the Real Estate and Expropriation Department, it was determined that there will no actual intervention or destruction in the cemetery properties registered in Karacasu District, Ataköy Neighbourhood, 177 island 16 and 17 parcel numbers belonging to Aydın Metropolitan Municipality and if any cemetery is found in the project area, necessary permissions must be obtained from the Municipality. In addition, T5 and T6 turbines are located 670 m away from Karacaören Neighbourhood and the T9 turbine is located 273 m away from Ataköy Neighbourhood that's the flora located the around of these neighbourhood must not damaged and should be protected.

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

Project affected neighbourhoods were visited by the social consultancy company appointed by the Project Company in June, July and August 2021 on a regular basis. The participatory field study was designed to exchange information on the phases and timeline of the Project, and to gain an understanding of the socioeconomic conditions and the main sources of income within the neighbourhoods around the Project area, potential impacts and whether there were any concerns or grievances about the Project by the local community members.

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

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

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. Public participation meetings were planned on 17 December 2021 in Aydın, Karacasu District, Işıklar Neighbourhood and on 17 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. However, as specified in the temporary SEP, both meetings could not be held due to the intense reaction of the local people and the Aydın Environment and Culture Platform (AYCEP).

4.3 Stakeholder Engagement Activities during ESIA

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

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

The aim of the site visit included collecting baseline data about the Project affected neighbourhoods understanding the Project-related concerns and expectations of the local community members, reflecting the views of key stakeholders, and identifying vulnerable

groups. In line with these aims, mukhtars and local residents were consulted during the site visit in order to identify local community members and other Project stakeholders, understand their perceptions about the Project, address any concerns they may have about the Project, and identify the Project impacts. The difficulty in conducting interviews with some stakeholder groups affected by the Project (e.g., vulnerable groups, NGOs) due to time constraints and logistical challenges remained as a limitation of the consultation study. The external stakeholders interviewed during the field studies are listed below:

- Babadağ District Agriculture and Forestry Director (Denizli)
- Mukhtar and residents of Kıranyer neighbourhood (Denizli)

The main findings of these consultations are summarized below:

- The residents were partially informed about the details of the Project and the procedures to be carried out related to the land expropriation.
- It was stated by the residents that especially the noise coming from the WPPs scares the animals. In addition, it is stated that the traffic density and dust formation will also cause community disturbance. Local community members expressed their reservations on these issues.
- While Babadağ District Directorate of Agriculture and Forestry has not developed any specific projects in the Project affected neighbourhoods, there is an expectation by the Director regarding the diesel, fertiliser, and credit support from the governmental bodies to the local community members of the region who are interested in agriculture (including olive cultivation).
- During the site visit, it was not possible to reach out all directly affected local community members. However, this limitation is filled with the studies carried out within the scope of RAP site visits in February 2024. In addition to this, the stakeholders consulted in general had limited knowledge on the applicability of international standards with relation to land acquisition. There are concerns about thyme collection activities in the region due to the deteriorating product quality since the WPPs came into operation. Even though the flora is declared intact, local people have observed changes.
- With all these concerns, the local community expects measures to be taken in general regarding community health and safety issues such as flora, traffic, dust and noise.
- As reported by the consulted stakeholders, the local community members had previously objected to the Project and prevented holding a public participation meeting.

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

4.4 ESIA Public Disclosure and Consultation

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

During the disclosure period, the findings of the ESIA studies, potential impacts of the Project and mitigation measures to be applied will be shared in a public participation meeting which is

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

planned to be held within the scope of the stakeholder engagement activities of the Project's ESIA process. This meeting may be held more than once depending on the accessibility of the meeting location and the size of the meeting area. Resettlement specific disclosure and consultation steps are given in RAP. During the resettlement specific disclosure and consultation meetings, Project-specific RAP will be disclosed to the PAPs directly affected by the Project.

The public participation meeting will be announced by soft copy invitations via e-mails, hard copy invitations via correspondence and mails, and press release by local newspapers and media agencies. The invitation will include a Project Information Document (PID) that involves brief information about the ongoing ESIA process as well as communication channels that the Project stakeholders can report their opinions and comments about the Project.

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

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

The documents in the disclosure package 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.

5 Stakeholder Engagement Programme and Disclosure Process

5.1 Overview

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

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

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

5.2 Community Liaison Officer (CLO)

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

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

5.3 Stakeholder Engagement and Consultation Program

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

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

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

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

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

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

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible
NGOs					
9	NGOs	<ul style="list-style-type: none"> Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project Outline the mitigation measures identified in the ESIA report 	<ul style="list-style-type: none"> Face-to-face consultation meetings Regular visits Disclosure of ESIA report together with its NTS (which also covers the summaries of CCRA and HRIA), SEP, PID/brochure and other Project related documents including RF, CHA Website announcements Social media announcements Announcements through posters/ billboards/ press release 	<ul style="list-style-type: none"> When needed during construction and operation 	<ul style="list-style-type: none"> CLOs Project Company
Media					
10	Media	<ul style="list-style-type: none"> Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project Outline the mitigation measures identified in the ESIA report Engage with local and regional media organizations for effective public disclosure and consultation 	<ul style="list-style-type: none"> Face-to-face consultation meetings Regular visits Disclosure of ESIA report together with its NTS (which also covers the summaries of CCRA and HRIA), SEP, PID/brochure and other Project related documents including RF, CHA Website announcements Social media announcements Announcements through posters/ billboards/ press release 	<ul style="list-style-type: none"> When needed during construction and operation 	<ul style="list-style-type: none"> CLOs Project Company

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible
Internal Stakeholders					
11	<p>Project Staff</p> <hr/> <p>Contractors and subcontractors and their employees</p> <hr/> <p>Suppliers and their workers</p>	<ul style="list-style-type: none"> • Provide information about the Project updates and changes in operations with regard to labour rights, information on contracts, code of conduct, including provisions for GBVH • Disclose the grievance mechanism of the Project 	<ul style="list-style-type: none"> • Trainings • Face-to-face consultation meetings • Disclosure of ESIA report, SEP, PID/brochure and other Project related documents • Announcements through posters/ billboards/ press release • Announcements on the Project area 	<ul style="list-style-type: none"> • Monthly during construction • When needed during operation 	<ul style="list-style-type: none"> • Project Company and relevant departments (i.e., Human Resources Department)

6 Project Grievance Mechanism

6.1 Overview

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

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

Grievance register form includes the signature of the applicant for the grievances received through meetings and visits. However, receiving the signature of the applicant is not applicable within the scope of the international standards on stakeholder engagement and grievance mechanism management. Also, the part in the form that requires information about the applicant shall be left blank in the cases where the applicant would like to raise grievance anonymously. The gender part is included in the form to categorize the grievances by gender of the applicants and take gender-sensitive measures in times of necessity. The grievance register form is revised in accordance with these principles. Grievances are categorized as external and internal depending on the type of the stakeholder. Since they have different grievance channels and resolution processes, they are defined in Sections 0 and 0 separately.

6.2 Principles of the Grievance Mechanism

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

- There will be a formalized and written Project Grievance Mechanism Procedure that involves the principles of the mechanism (including anonymity), available channels with contact details of the CLOs, defined timeframes for acknowledgement of the receipt of complaints and subsequent resolution, sample subjects that describes the type of grievance as per the identified Project impacts (i.e., noise, air, visual, dust, GBVH, labour management, and traffic), and management and resolution process together with the assigned responsible Project staff.
- Grievance mechanism will be committed to confidentiality and anonymity. Grievance channels both online and offline will be enabled to receive anonymous applications.
- It is crucial to provide appropriate environment where all internal and external stakeholders can easily report any GBVH-related grievance in a safe and confidential way when they

need. GBVH cases will be registered and processed as a part of the current grievance mechanism. However, they will be approached in a more sensitive way and in an immediate time manner through ensuring confidentiality, non-retaliation, protection and supervision of victims, and utilize legal expertise when needed. A female CLO has been employed for the Project in order to work more effectively with women in case if a GBVH incident occurs during the lifetime of the Project. Please see Section 6.5 for contact details of the CLOs.

6.3 External Grievance Mechanism

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

- The grievance form disclosed on the Project website⁸ that enables anonymous grievance applications
- Verbal statements during face-to-face meetings/visits
- Phone calls and/or online messages (i.e., via WhatsApp) to the Project Company/CLOs
- Petitions
- Posters⁹ that are hung in common areas of the Project affected neighbourhoods, indicating what the clear communication channels are
- E-mails to the Project Company

The steps listed below summarize the external grievance mechanism process:

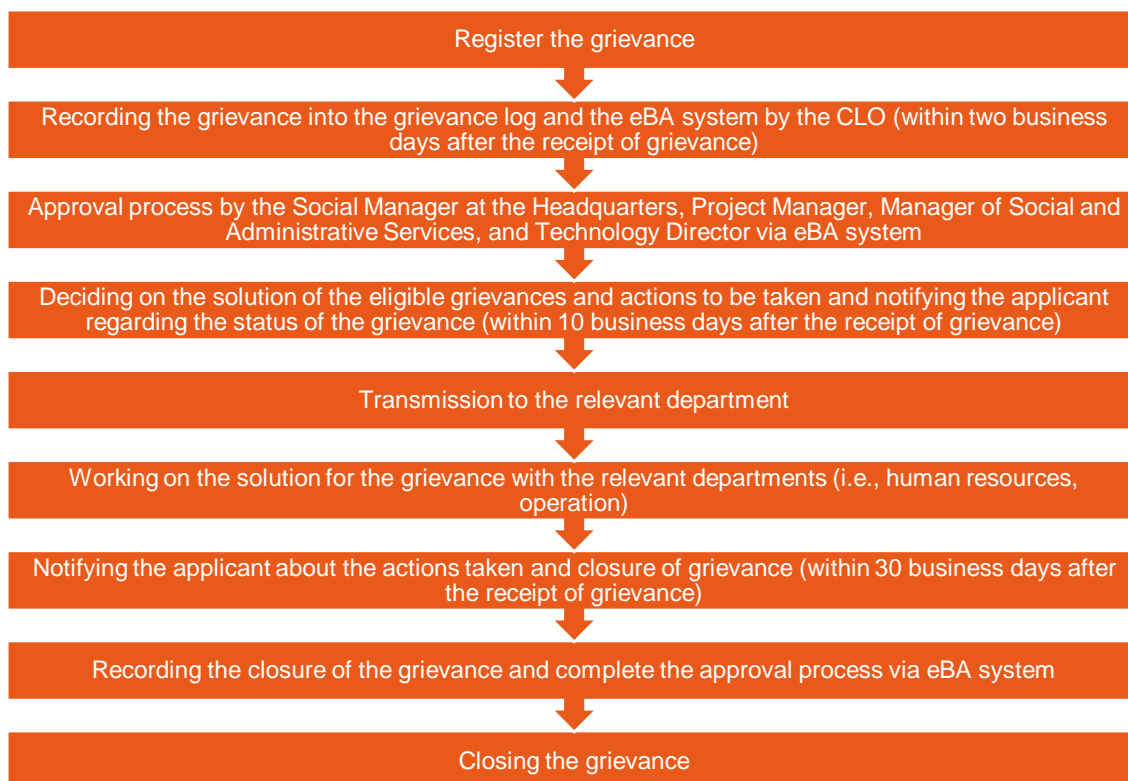


Figure 6.1: Steps of the External Grievance Mechanism Process

Should the Company be unable to resolve a complaint, or if the stakeholder is not satisfied with the outcome, the Company may consider seeking advice from other independent parties (i.e.,

⁸ Project website can be accessed via <https://yekares2.enerjisaretim.com>. The link of the grievance form on the Project website will be included once finalized.

⁹ Poster is given in Appendices Section 9.5.

local legal institutions and/or well-regarded NGOs) for further investigation, root cause analysis or actions in line with the good international practices on grievance management. Applicants always have the right to appeal to local or relevant legal authorities for a solution with which they are not satisfied.

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

As part of the Project's external grievance mechanism:

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

6.4 Internal Grievance Mechanism

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

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

- Grievances will be classified and prioritized depending on their subjects while registering to the grievance log. Accordingly, resolution period for the grievances with high priority is recommended to be seven days after the receipt of the grievance. For the grievances with

medium priority, it is 15 days and the grievances that are prioritized as low can be resolved within 30 days.

- After the grievances are successfully closed and the corrective actions are taken, the results of the grievances including anonymous grievances will be displayed on the notice boards within the Project site.

In summary, all Project staff will be able to report their grievances through one-to-one meetings, petitions, telephone calls, e-mails, online forms that enable anonymous grievance applications, grievance boxes (including site offices, canteens and/or worker accommodation locations), and collective meetings. The Project Company aims at creating a positive working environment based on open and continuous communication.

6.5 Grievance Mechanism Channels and CLO Contact Details

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

Grievance Mechanism Channels

- Official letter and/or petition to;
 - The Head Office (Barbaros Mah, My Office İş Merkezi, Çiğdem Sok. No:1/16 34746 Ataşehir/İstanbul), or
 - The Project Administration Office [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>
- The grievance form disclosed on the Project website that enables anonymous grievance applications
- Posters that are hung in common areas of the Project affected neighbourhoods (i.e., teahouses and/or mukhtars' offices), indicating what the clear communication channels are

Contact Details of the CLO

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

7 Resources and Responsibilities

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

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

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

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

Project Manager

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

Corporate Social Manager at the Headquarters of the Project Company

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

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

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

8 Monitoring and Reporting

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

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

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

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


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

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

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

9 Appendices

9.1 The Consultation Form of the Project Company

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

9.2 Project Consultation Log of the Project Company

Stakeholder Type	Institution Consulted	Stakeholder	Gender	Phone	Communication Channel	Date	Agenda Of the Meeting	Number Of Stakeholders Engaged	Team	Person Filling Out the Form	Details Of the Consultation

9.3 Revised Project Grievance Register Form

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

9.4 Project Grievance Closure Form

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

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

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

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

HALKLA İLİŞKİLER UZMANLARIMIZ

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ENERJİSA ÜRETİM

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

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

