



Harmancık Wind Power Plant (WPP) Project - Environmental & Social Impact Assessment

Stakeholder Engagement Plan

June 2024

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List of Acronyms

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

Term	Definition
PS	Performance Standards (IFC)
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 Çanakkale Connection Region on 30 May 2019 within the scope of “Renewable Energy Resource Areas (YEKA) Regulation” and “Allocation of Wind Energy Based Renewable Energy Resource Areas (YEKA) and Total Connection Capacities”¹. Upon this award, a “YEKA Use Rights Agreement” was signed between Enerjisa Üretim Santralleri Anonim Şirketi and Ministry of Energy and Natural Resources (MoENR) on 09 March 2020. Subsequently, the “YEKA Use Rights Agreement” signed by Enerjisa Üretim Santralleri Anonim Şirketi for the Çanakkale 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.

Harmancık Wind Power Plant (WPP) Project (“the Project”) with 10 turbines and 42 MW_m/42 MW_e total installed power, is planned to be established by Enerjisa Üretim in Çanakkale Province, Central and Lapseki Districts, Yukarıokçular, Kızılkeçili, Üçpınar and Hacıgelen villages. The Project components consist of 10 turbines, a switchyard, a total of 4,406 m Project road which are planned to be constructed (i.e., access and site roads) and as well as an 154 kV single-circuit transmission line of approximately 5 km for connection to Üçpınar Transformer Substation which is currently operated by TEİAS. The Project is part of a nine-project wind energy investment package initiated by EnerjiSA which has a 750 MW total installed power from a total of 180 wind turbines located in the Aegean Region 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 16 months and the operation period will be 49 years as stated in the National Environmental Impact Assessment (EIA) Report. The construction of the Project has been initiated in the fourth quarter of 2023 with the construction of Project roads and is planned to be completed by the first 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 Savra (with a competency certificate dated 13 July 2019 and numbered 332). The Final National EIA Report was submitted in January 2023 by Savra. 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 07 March 2023 by the 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

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

amendment 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 10 wind turbines, each with a unit power of 4.2 MW_m/4.2 MW_e; and one turbine with unit power of 4.2 MW_m/2.2 MW_e. It is projected that the WPP will have a 147,268,800 kWh/year of annual electricity generation capacity with a total installed power of 42 MW_m/ 42 MW_e. Detailed information on design changes is provided in the Environmental and Social Impact Assessment (ESIA) Report, which is prepared to identify the impacts that are likely to occur due to implementation of construction and operation activities under the Project, and to comply with the requirements set by the IFIs. The ESIA for the Project aims to ensure that the Project is developed and operated in an environmentally and socially responsible manner, minimising or eliminating adverse impacts and maximizing positive contributions to the surrounding communities and the ecosystem.

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

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

The Project includes several parties involved within various Project-related activities. In this sense, as well as its own Project team, the Project Company has appointed several consultancy companies to support during the National EIA process. The consultancy activities include social studies undertaken by Adam & Smith, and environmental monitoring studies for the National EIA undertaken by Ekogen. The social consultants have regularly visited the mukhtars and residents of the villages 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 villages. During the visits, they also provided information about the Project and its potential impacts on the villages, 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.

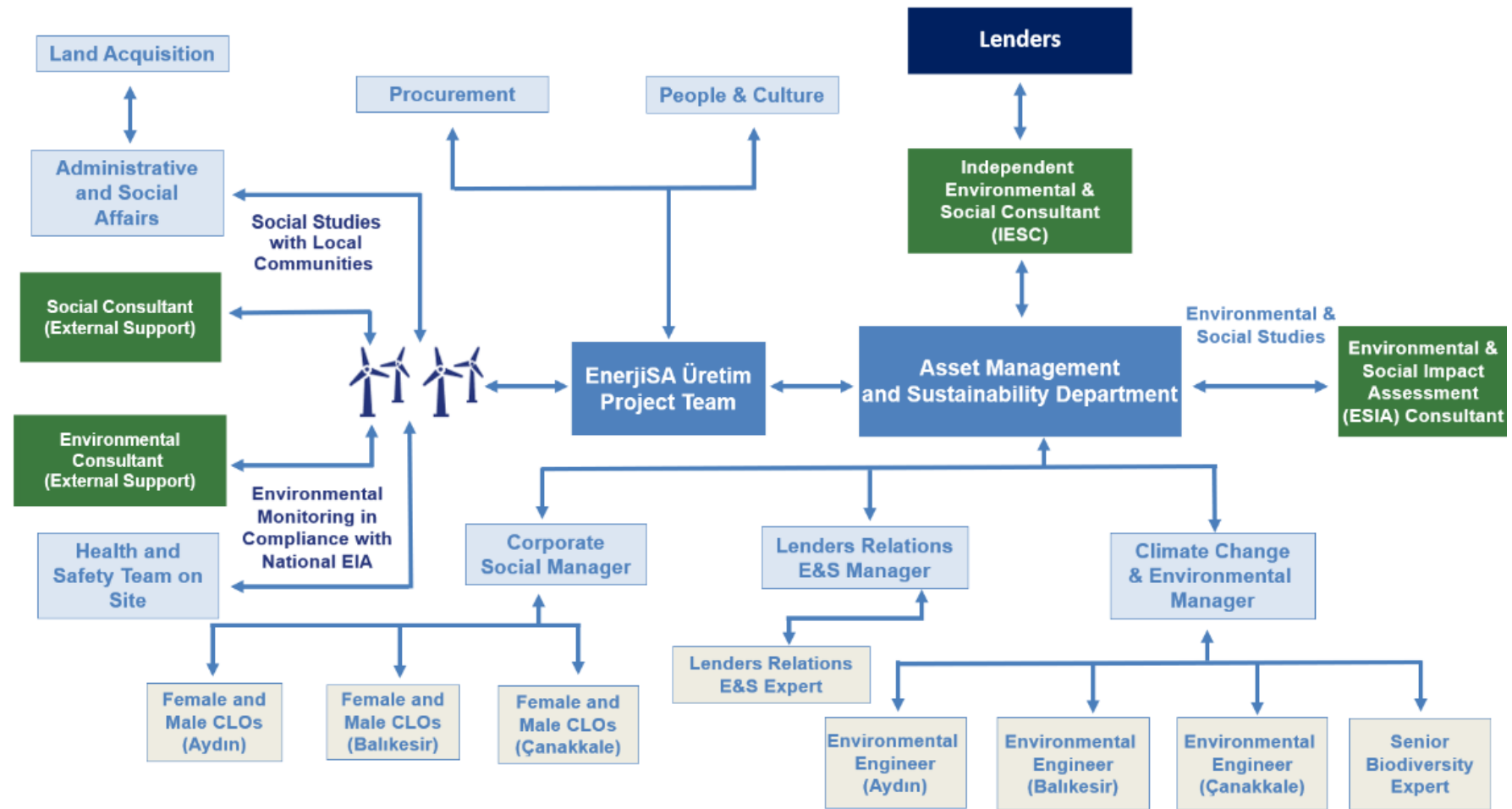


Figure 1.1: Project Organisational Chart

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 impact assessment study and prepare the ESIA Report together with the relevant sub-plans.

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

1.2 Objectives and Scope of the Stakeholder Engagement Plan

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

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

The temporary SEP includes information about the previous stakeholder engagement activities and describes the future engagement requirements as well as the grievance mechanism, all of which are covered in the subsequent parts of this SEP. As per the temporary SEP and other related documents of the Enerjisa Üretim, the stakeholder engagement activities conducted so far have followed a local community member-centred and structured framework in line with the international requirements. The same approach will continue to be applied on site throughout the Project lifecycle.

The Project Company is committed to actualize effective stakeholder engagement as defined in this SEP and in line with the IFC PS1, EBRD PR10, EP IV Principles and 5 and 6, and DFC ESPPs 3 and 5 requirements. The Project Company is also committed to follow the Turkish EIA Regulation (OG Date/Number: 29.07.2022/31907), Law on Right to Information (No. 4982), Law on Preservation of Personal Data (No. 6698), Law on Use of the Right to Petition (No. 3071), and Regulation on the Principles and Procedures for the Enforcement of the Law on 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.

⁵ The Project Company requires compliance with EBRD requirements.

1.3 Project Location and Social Area of Influence

The social area of influence (Aol) of the Project covers a total of seven villages in Central and Lapseki districts. The social area of influence (Aol) of the Project covers a total of seven villages in Central and Lapseki districts. These villages are Yapıldak, Musaköy, Kızılkeçeli, and Yukarıokçular, which are within Central district, and Beybaş, Hacıgelen, and Üçpınar villages in Lapseki district, which are the closest villages to the Project area including access roads. 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 ESIA. Further assessments will be made for both the pylon points and the line route once the land acquisition procedures on the parcels to be affected by the ETL construction are finalised. In the RAP to be prepared, a framework to ETL construction will be presented and potential entitlements will be revealed.

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,
- Nearby villages and business enterprises located in the immediate vicinity of the Project area (approximately 1.6 km to 4.5 km distant from the nearest turbines to their villages) 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 License Area for agriculture and animal husbandry purposes and that may experience livelihood loss, increased traffic volume and road safety risks,
- Local community members who lose their agricultural or pasture lands may be adversely affected in terms of economically due to land acquisition and urgent expropriation processes (physical displacement has been avoided),
- 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:

- Local community members whose livelihoods have the potential to be significantly and adversely affected due to land acquisition and/or expropriation,
- 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 villages (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 villagea. It is likely that there will be traffic volume increase and dust generation on the main roads used to access the village, 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 staff 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 village and integrated into daily life.	Local community members / Project affected villages	Construction	<ul style="list-style-type: none"> • Trainings and Code of Conduct for workers • SEP, continuous consultation and engagement through the Community Liaison Officer (CLO) • 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
	<p>Increased traffic volume during the construction phase throughout the access roads to the Project area may result in road traffic safety risks.</p> <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. Residents whose 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
Land Use, Physical and Economic Displacement	The land acquisition works of the Project is in progress. The lands planned to be acquired for expansion are used for generally agricultural purposes. Therefore, local community members who lose their agricultural or pasture lands may be impacted economically since their livelihood activities become limited or totally	Local community members whose lands are acquired-expropriated	Construction	<ul style="list-style-type: none"> • SEP, continuous consultation, and engagement through the CLO • Community grievance mechanism • Resettlement Action Plan • Land Acquisition Procedure

Impact Topic	Impact Description	Receptor	Phase of the Project	Mitigation Measures
	lost. Within the Project license area, there are restrictions on carrying mining activities and establishing licensed energy production facilities. Apart from this, there are no restrictions on constructing any other infrastructure or superstructure elements.			
	The local community members that are impacted by the land acquisition and expropriation may have residual impacts stemming from incomplete processes. If there are people who are physically or economically displaced after construction, the follow-up of these people will continue during the operation phase. Physical displacement is not expected within the scope of the Project.		Operation	
	It is important to consider the harvest and cultivation dates of the agricultural products to reduce the risk of dust and loss of livelihood during the construction activities.	Local community members whose livelihoods are based on agriculture		<ul style="list-style-type: none"> ● SEP, continuous consultation and engagement through the CLO ● Community grievance mechanism ● Air Quality Management Plan ● Resettlement Action Plan
Local Economy, Livelihood Sources and Employment	The contractors and subcontractors of the Project will employ the local unskilled and semi-skilled workforce. This can contribute to a certain reduction in unemployment and increase in the welfare of the employed workers' families.	Local community members / Project affected villages	Construction	<ul style="list-style-type: none"> ● Local employment and procurement strategy ● SEP, continuous consultation, and engagement through the CLO ● Resettlement Action Plan ● Community grievance mechanism ● Local Content and Procurement Procedure (LCPP)
	During the construction phase of the Project, there will be numerous procurement opportunities which may be beneficial for the local businesses,	Local community members / Local businesses, enterprises, and suppliers		

Impact Topic	Impact Description	Receptor	Phase of the Project	Mitigation Measures
	enterprises, and suppliers in terms of income generation and increase. 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. 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 CLO • 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 villages 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 village s	Construction	<ul style="list-style-type: none"> • SEP, continuous consultation and engagement through the CLO • Traffic Management Plan • Community grievance mechanism • Correspondence with governmental institutions when necessary (i.e., for water, road, transportation issues) • Community Health, Safety and Security Procedure
Gender	The Project may improve the gender equality through local employment of both women and men residing in the Project affected villages. Land acquisition activities may not be conducted with the equity and equality perspective, which may lead to the fact that local community members are discriminated due to their gender and other characteristics.	Local community members	Construction	<ul style="list-style-type: none"> • Trainings and Code of Conduct for workers • Awareness raising activities for the Project affected villages • Specific meetings with women in the Project affected villages • SEP, continuous consultation and engagement through the CLO • Community grievance mechanism • Community Health, Safety and Security Procedure

Impact Topic	Impact Description	Receptor	Phase of the Project	Mitigation Measures
	<p>The potential influx of male workers into villages due to the Project construction activities has various impacts on women's daily lives and livelihood activities, which should be considered when discussing gender and vulnerable groups. Increased congestion and noise are not expected to disrupt women's daily routines, including household chores, childcare responsibilities, and access to community resources.</p> <p>Throughout the construction activities, gender-based violence and harassment (GBVH) cases may occur unless preventive measures are taken.</p>			<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 CLO 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. Apart from these, it is possible to mention about positive impacts ranging from the repair of some connection roads in the region during the construction phase to ultimately 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.

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, only one structure was identified within the setback distances for blade throw risks which is an unused building of the Directorate of Forestry; additionally, blade loss risks were evaluated for average and maximum wind speed, and it was discovered that there no structures within the average and the maximum wind speed throw zones. To conclude, the receptor sensitivity of the blade throw can be assumed to be low as there are no structures within the throw distances. Considering the low probability and expected small throw distance, the impact regarding the blade throw is considered negligible for the average distance and maximum distance, which makes the overall impact magnitude negligible for both distances. Hence, no physical displacement is in question as no significant blade throw risk is in place.

ESIA studies pointed out that there is only one structure within the ice throw distance of the Project. Since this structure is an unused building of the Directorate of Forestry, ice throw related impacts are not foreseen for any of the receptors within the scope of the Project. In short, no impacts have been detected at identified receptors for the Project in terms of blade and ice 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 is 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 – Labor 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

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 member of the Business Council for Sustainable Development Türkiye since 11 January 2022. Furthermore, the Project Company is a signatory of the United Nations Global Compact since 02 August 2022 and Women's Empowerment Principles (WEP) 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	MoLSS may have specific views on labour and working conditions, and health and safety of the Project personnel.	Low
Ministry of Labour and Social Security (MoLSS)			
MoLSS, General Directorate of Labor			
MoLSS, General Directorate of Occupational Health and Safety	MoCT may have views in terms of legislation.	Low	
Ministry of Culture and Tourism (MoCT)			
MoCT General Directorate of Cultural Heritage and Museums	This organization may have specific views about water courses running close to the Project area.	Low	
25 th Regional Directorate of DSI (State Hydraulic Works)			
4 th Regional Directorate of Ministry of Agriculture and Forestry			
14 th Regional Directorate of General Directorate of Highways			
Regional	Çanakkale Regional Board Directorate of Cultural Assets Protection	This organization is an important stakeholder to identify and clarify the archaeological potential of the Project area.	High
	The Governorship of Çanakkale	The governorship representing the national government is the highest authority in the province.	High
	Çanakkale Investment and Coordination Committee Directorate	This organization coordinates all kinds of investment and construction works to be carried out by ministries and other central government organizations in the provinces.	High
	Çanakkale Municipality	The municipality and its relevant departments will have responsibilities in relation to the Project.	High
Çanakkale Municipality, Directorate of Environmental Protection and Control			
Çanakkale Municipality, Directorate of Zoning and City Planning			
Provincial	Çanakkale Municipality, Directorate of Transportation		

GOVERNMENTAL BODIES

Level	Organization	Relation to the Project	Level of Interest
	Çanakkale Governorship Provincial Directorate of Social Security Institution	This organization may provide specific views on labour and working conditions, and health and safety of facility personnel.	Low
	Çanakkale Governorship Provincial Directorate of Environment, Urbanization and Climate Change (PDoEUCC)	PDoEUCC has regulatory functions related to the Project such as environmental impact assessment permits and environmental permitting.	High
	Çanakkale Provincial Directorate of Environment and Urbanization	This organization has regulatory functions in relation to the Project such as environmental impact assessment permits and environmental permitting.	High
	Çanakkale Cultural Heritage Preservation Regional Board Directorate	This organization is an important stakeholder to identify and clarify the archaeological potential of the Project area.	High
	Çanakkale Provincial Directorate of Agriculture and Forestry	These organizations may provide provincial-specific and/or site-specific views on the Project.	High
	Çanakkale Provincial Command of Gendarmerie		Medium
	Çanakkale Water and Sewer Administration	This organization may provide an opinion related to water/wastewater infrastructure of the Project area.	Medium
	The Local Governorship of Lapseki, The Municipality of Lapseki	The Project area is located in Lapseki district and the local governorship, the central municipality and their related departments are stakeholders regarding obtaining relevant permits, approvals during planning, and construction and operation phases of the Project.	High
	Directorate of Zoning and Urbanisation		
	Directorate of Civil Works		
	Directorate of Plan and Project		
	Directorate of Cleaning Works		Medium
	Directorate of Municipal Police		Medium
	Lapseki District Directorate of Health		Medium
	Lapseki District Gendarmerie Command		High
	Lapseki 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		
	Çanakkale Bee Breeders Association		
	Association for Sustainable Economics and Finance Research (SEFiA)		
	Troya Environment Association		
Troya Renewable Energy Cooperative			

NON-GOVERNMENTAL BODIES

Level	Organization	Relation to the Project	Level of Interest
	Çanakkale Troida Women's Initiative Production and Operation Cooperative		High
	Marmara Women's Cooperatives Union		
	Çanakkale Purple Solidarity Women's Association		
	Çanakkale Women's Handicraft Association and Women's Counselling Centre		
	Çanakkale Mentally Disabled Association		
	Çanakkale Branch of Türkiye Physically Disabled Association		
	Türkiye Visually Impaired People Association Çanakkale Branch		
	Six Dots Association for the Blind Çanakkale Branch		
	Lapseki Chamber of Agriculture		
	Lapseki Chamber of Commerce		
	Lapseki Chamber of Tradesmen and Craftsmen		
	Lapseki Environmental Protection, Production, and Solidarity Association		
	Lapseki Beekeepers Association		
	Lapseki Solidarity and Beautification Association		
	İDA Solidarity Association		
	Kazdağı Natural and Cultural Assets Protection Association		
	Lapseki Poultry Lovers and Breeders Association		

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 Kızılköçü, Yukarıoğçular, Yapıldak, Musaköy, Hacıgelen, Üçpınar, Beybaşı villages	Villages 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 Local communities including PAPs subject to direct land acquisition		
Vulnerable/ Disadvantaged Groups	Women	Vulnerable groups are key stakeholders considering potential impacts of the Project.	High
	The landless/homeless people		
	The elderly		
	People with disabilities		
Media	Unemployed people	It is important to engage with local and regional media organizations for effective public disclosure and consultation.	Medium
	Seasonal workers		
	Local, regional, and social media (including but not limited to the following newspapers, TV stations, social media channels):		
	• Çanakkale TV		
	• Ton TV		
	• Channel 17		
	• Çanakkale Gündem		
• Aynalı Pazar Newspaper			
• Çanakkale Zafer Newspaper			
• Kalem Newspaper			

STAKEHOLDER GROUPS

Level	Group	Relation to the Project	Level of Interest
Universities	Çanakkale Onsekiz Mart University	Universities are one of the key stakeholders when research needs to be conducted within the scope of the Project.	Medium
Other potentially affected local social institutes	Local schools (i.e., Umurbey Primary School, Umurbey Secondary School) Mosques Local Coffeeshops State Hospitals (Çanakkale Mehmet Akif Ersoy State Hospital, Lapseki State Hospital) District Fire Stations (Çanakkale Municipality Fire Department, Lapseki Fire Station) Fire Watchtowers near the Project affected villages	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

Table 3.4: Internal Stakeholder List

INTERNAL STAKEHOLDERS

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

4 ESIA Assessment Consultation Activities and Outcomes

4.1 Overview

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

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

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

Correspondence / Opinion Letters

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

- Ministry of Environment, Urbanization and Climate Change,
 - General Directorate of Environmental Impact Assessment, Permit, and Inspection
 - General Directorate of Meteorology, Presidency of Observation Systems Department
 - General Directorate of the Protection of Natural Assets
- Ministry of Energy and Natural Resources,
 - General Directorate of Energy Affairs
- Ministry of Agriculture and Forestry
 - General Directorate of Forestry, Permit and Easement Department
- General Directorate of Highways, Survey, Project and Environment Department, Environmental Branch Directorate
- General Directorate of State Airports Administration, Department of Electronics
- General Directorate of Forestry Çanakkale, Permit and Easement Branch Directorate

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

- Ministry of Agriculture and Forestry, General Directorate of State Hydraulic Works (DSİ) has concerns related to the Project's impact on water sources and riverbeds. They emphasize the importance of preserving structures and maintaining minimum distances between the turbines and riverbeds.
- Ministry Of Culture and Tourism, General Directorate of Cultural Heritage and Museums, Çanakkale Cultural Heritage Preservation Regional Board Directorate has reported that there were no cultural assets in the license area. However, during physical and construction interventions in the area, if any discovery of cultural heritage items or remains of cultural heritage significance subject to the Law No. 2863 is made, it is mandatory to immediately halt the activities and report this discovery to the nearest Museum Directorate within three days, in accordance with the "Obligation to Notify" under the mentioned law.

- General Directorate of Highways 14th 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.
- 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 "Harmancık WPP Special Permit Area" under number ER: 3421571, as identified within the provided coordinates. Therefore, it is noted that there is no objection from the Authority to the finalization of the Project.
- Ministry of Agriculture and Forestry General Directorate of Nature Conservation and National Parks has emphasized that, a commitment from the Project Company is required regarding measures to eliminate or minimize the potential negative impacts included in the ecosystem assessment report, ornithological assessment report and bat monitoring report. In addition, during operational phase of the Project, the effects of the Project on birds shall be monitored, evaluated and reported by an ornithology expert for a period of 3 years. The work should be carried out in the field for a maximum of 3 consecutive days, representing the migration period, between 15 August and 15 October for the autumn migration period, and 30 days each between 15 March and 15 June for the spring migration period. Furthermore, during operational phase of the Project, the effects of the Project on bats shall be monitored, evaluated and reported by a bat expert for 5 days/night every month, from end of March to October.
- Çanakkale Special Provincial Administration License and Inspection Directorate has notified that forest area and surface water remain in the Project area. Following the National EIA process, it is necessary to apply to the Çanakkale Special Provincial Administration License and Inspection Directorate for the sub-scale plans that need to be made for the area in question in accordance with the Zoning Law No. 3194 and the relevant legislation. In addition, it is necessary for privately owned parcels, to apply for the Zoning Status Certificate from Administration and then obtain a building permit.
- Çanakkale Special Provincial Administration Water and Canal Services Directorate notes that there are drinking water transmission lines belonging to the villages in the Project license area. The damaged units, needs to be repaired by the Project Company in case any damage occurs as a result of Project activities.
- Canakkale Special Provincial Administration Road and Transportation Services Directorate has concerns about the Project's impact on village road traffic safety. The approval has been granted provided that all traffic measures regarding the use of village roads are taken for transportation operations and traffic safety is ensured.

In conclusion, various authorities have raised concerns about different aspects of the Project. These concerns include safety, environmental impact, and compliance with legislation. The authorities have outlined specific requirements and recommendations for the Project's

development. The official correspondences conducted within the scope of environmental and social studies were provided in the final National EIA Report.

Within the scope of the National EIA studies, social impact assessment studies were conducted as well. The Project Company appointed a social consultancy company, whose consultants have been on the field and consulting the residents in the nearby villages for approximately two years (between July 2021 and September 2023). Accordingly, stakeholder engagement activities started in July 2021 with the involvement of the social consultants to grasp the socioeconomic background of the Project affected villages. Consultations were conducted with mukhtars, local community members, and non-governmental organisations to identify the issues and concerns of the stakeholders in relation to the Project.

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

The public participation meeting was carried out in Çanakkale province, Lapseki District, Üçpınar village within the scope of the National EIA Studies on 13 December 2021. The meeting aimed to engage with the public, especially the local community members, provide information about the Project, and gather their feedback and concerns regarding the Project. Local community members are composed of the ones who live in the residential areas that are close to the Project area and the end users who will be involved in benefitting from the activities undertaken in the scope of the Project.

The meeting was hosted by Çanakkale Directorate of Environment and Urbanization with a presentation provided to the participants. A total of 24 people participated in the meeting including officials from the Ministry of Environment, Urbanization and Climate Change Energy Investments Department, officials from Çanakkale Governorship Provincial Directorate of Environment and Urbanization, representatives from the Project Company, representatives from the Consultant Company, mukhtars of the Üçpınar and Yukarıokçular villages, and residents from the Üçpınar and Yukarıovacık villages. The presentation covered the issues related to the need for the Project, the rationale for choosing this particular area and the environmental measures that would be implemented for the potential impacts. The participants had a number of concerns and requests about the Project regarding the following:

- The potential positive and adverse impacts of the Project on the Project affected villages
- The human resource for the Project workforce
- The impacts on roads due to construction activities of the Project
- Mitigation measures for any damage due to the Project
- The possibility of constructing a new road within the scope of the Project
- If there would be any construction vehicles passing through the villages during the construction phase of the Project
- The current status of the legal permitting about the Project activities
- The potential support to provide to the local communities through the generated electricity
- The method of communication between the turbines and if it would be underground or not
- The impact of noise during the operation phase of the Project
- The potential harm of the Project to the animals within the Project affected villages

For the above-mentioned concerns and questions, necessary explanations and clarifications were provided to the participants in accordance with the relevant sections of the National EIA Report.

The social consultants have continued to regularly visit the mukhtars and residents of the villages that are in close proximity to the Project area (mainly Hacıgelen, Kızılkçeçili, Üçpınar, and Yukarıokçular).

The consultants collected information about the history, residential conditions, natural structure, population, migration, health, education, and cultural patterns of the villages. During the visits, they also provided information about the Project and its potential impacts on the villages, especially land acquisition and expropriation.

It is observed that the regular stakeholder engagement and social consultation that had started in earlier phases of the Project led the residents to have a more positive attitude toward the Project by understanding the potential Project impacts and contributions of the Project Company to the villages. In this regard, the residents expect the Project Company to improve the villages' and residents' economic conditions in terms of the following aspects:

- The qualification mapping of the existing human resource in the region to feed the required workforce during and after the Project construction process. Determining the positions to be employed locally and the vocational knowledge and skills training to be provided accordingly,
- Providing support (especially in irrigation and maintenance and similar technical issues) for orchard gardening, which has become an important income-generating activity in the region recently,
- Conducting studies to increase the market opportunities of dairy production in the region.

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 villages included in the Project's social Aol were visited. Following these visits, the Consultant carried out a field visit in October 2023 with the aim of identifying and updating the changes in the social baseline structure in the villages 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.

In addition to the local community members and residents in the Project affected villages, specific emphasis was placed on outreach to local non-governmental organizations. Meetings were conducted with the IDA Solidarity Association and Kazdağları Ecology Platform to address their concerns and provide information about the Project. However, only a stakeholder list with contact details of the stakeholders were provided and the outcomes of the consultations with these stakeholders were not registered in a written way. Additionally, further information could not be retrospectively retrieved from Adam Smith.

4.3 Stakeholder Engagement Activities during ESIA (October 2023)

Mott MacDonald Social Team conducted a site visit on 30-31 October 2023 within the scope of the ESIA studies. Out of the seven affected villages, only two were visited by the Consultant as a part of the site visit conducted in October 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 villages 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 village 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 villages, 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, key district-level governmental bodies, mukhtars and local residents were consulted during the site visit in order to identify local community members and other Project stakeholders, understand their perceptions about the Project, address any concerns they may have about the Project, and identify the Project impacts. The difficulty in conducting interviews with some stakeholder groups affected by the Project (e.g., vulnerable groups) due to time constraints and logistical challenges remained as a limitation of the consultation study. The external stakeholders interviewed during the field studies are listed below:

- Çanakkale Provincial Directorate of Agriculture and Forestry
- Mukhtar and residents of Hacıgelen village (Çanakkale)
- Mukhtar and residents of Üçpınar village (Çanakkale)

The main findings of these consultations are summarized below:

- The residents were informed about the Project about a year ago.
- Consulted residents of Hacıgelen and Üçpınar villages had some concerns about the Project's potential adverse impacts, which include damage on the natural water resources, the forests change in the current climate (i.e., less rain), and loss of trees, and animals due to Project activities.
- Residents of both villages reported that tree felling has started in the area where the wind turbines are located.
- Residents also stated their concern about the microclimate change in parallel with the activities of other energy companies in the region.
- It was mentioned that the nearest turbine to be built is 1.5 km distant to the villages and it may disturb the local residents since the sounds coming from other turbines operated by another company disturb the public at night.
- The majority of the consulted residents were aware of the Project's land acquisition activities and mentioned that the land acquisition negotiations were handled well by the Project

Company. No important situation regarding the expropriation and land acquisition processes was noted.

- During the site visit, it was not possible to reach out any directly affected PAPs. But this limitation is filled with the studies carried out within the scope of RAP site visits. In addition to this, the stakeholders consulted in general had limited knowledge on the applicability of international standards with relation to land acquisition.
- The following development areas were suggested and/or expected by the consulted stakeholders:
 - Establishing socioeconomic/community development projects for the residents residing in the Project-affected villages,
 - Creating local employment opportunities for the youth and unemployed in the nearby villages,
 - Providing support to construct or improve the social facilities (i.e., coffee house) in the nearby villages.

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 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 village 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 villages and desires to participate in the meeting.

Local community members 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

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.

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 villages (Kızılköçü, Yukarıokçular, Yapıldak, Musaköy, Hacıgelen, Üçpınar, Beybaş)	<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 Disclosure of the Project-specific RAP to the PAPs directly affected by the Project 		
	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"> 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 Villages (Kızılköçü, Yukarıokçular, Yapıldak, Musaköy, Hacıgelen, Üçpınar, Beybaş)	<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 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
		<ul style="list-style-type: none"> Outline the mitigation measures identified in the ESIA report 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 Disclosure of the Project-specific RAP to the PAPs directly affected by the Project 		
		<ul style="list-style-type: none"> Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.) 			

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible
3	Vulnerable Groups (Women, the landless/homeless people, the elderly, 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 focus group meetings held with women groups and other particular vulnerable groups 	<ul style="list-style-type: none"> • Bi-monthly during construction • Semi-annually during operation • 3 days prior to risky construction activity 	<ul style="list-style-type: none"> • CLOs • Project Company

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

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

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

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

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 CLO, 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 stakeholders 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 villages, indicating what the clear communication channels are
- E-mails to the Project Company

The steps listed below summarize the external grievance mechanism process:

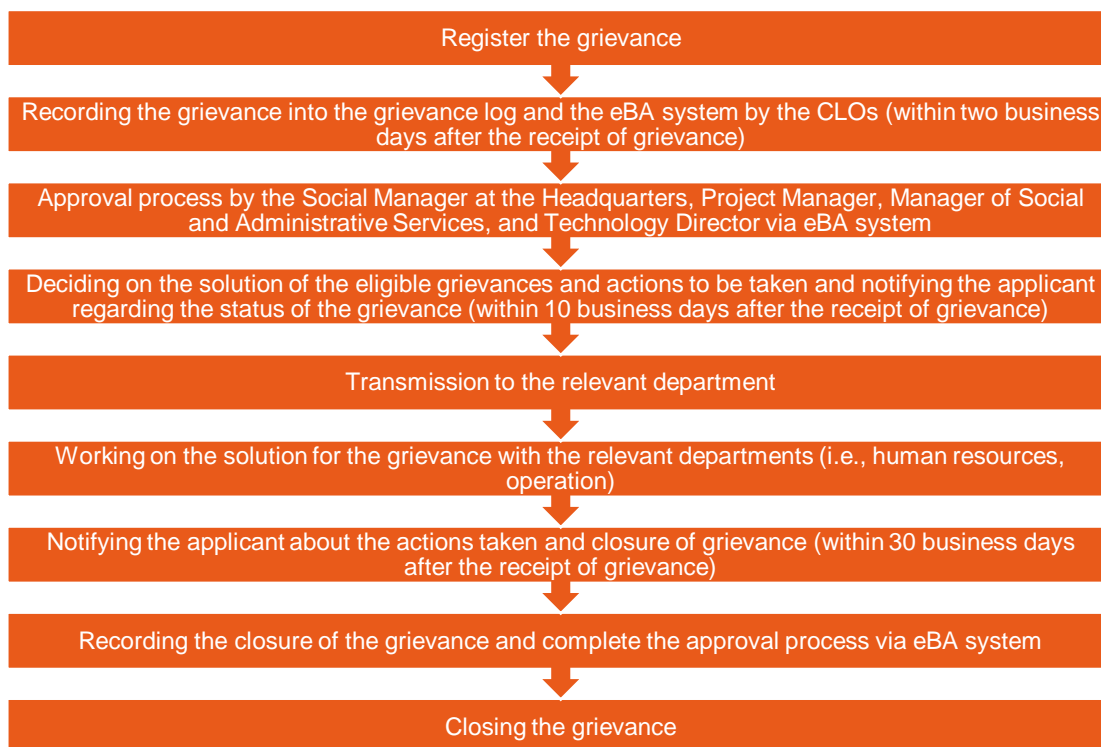


Figure 6.1: Steps of the External Grievance Mechanism Process

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 e.g., 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 (Yukarı Okçular Mah, Çukurtarla Mevkii, Merkez/Çanakkale)
- 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 villages (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 CLO are as follows:

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

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

Project Manager

- Holding regularly scheduled meetings with the CLO to supervise and evaluate the quality and impact of stakeholder engagement activities.
- Conducting monthly meetings to address and monitor any complaints received by the CLO. 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 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
HARMANCIK RÜZGAR
ENERJİ SANTRALİ PROJESİ
İLE İLGİLİ HER KONUDA
BİZİMLE DOĞRUDAN
İLETİŞİME GEÇEBİLİRSİNİZ**

HALKLA İLİŞKİLER UZMANLARIMIZ

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

ENERJİ SA ÜRETİM

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

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

