



Balabanlı Wind Power Plant (WPP) Capacity Extension Project

Stakeholder Engagement Plan

October 2024

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Stakeholder Engagement Plan

October 2024

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1 Introduction and Project Summary

1.1 Overview

Balabanlı Wind Power Plant (WPP) with 22 turbines and 50.6MW_m/50MW_e total installed power has been operating by Borusan EnBW Enerji Yatırımları ve Üretim A.Ş. (hereinafter referred to as the “the Project Company”, “Borusan EnBW Enerji” or “BEE”) since July 2014 and then capacity extension Phase I, additional 3 turbines with an installed capacity of 10.8MW_m/10.5MW_e, was constructed and commissioned in July 2017 in Tekirdağ province, Muratlı and Çorlu districts, Balabanlı and Maksutlu neighbourhoods. In March 2020, 0.9 Mwe electrical power extension was commissioned, bringing the total installed capacity of Balabanlı WPP to 61.4MW_m/61.4 Mwe.

Balabanlı WPP Capacity Extension (Phase II) Project (“the Project”) with 6 wind turbines and 35.4 MW_e/MW_m total installed power is planned in Tekirdağ province; Muratlı and Çorlu districts; Balabanlı and Maksutlu neighbourhoods. With the capacity increase the total installed capacity of the Balabanlı WPP will be 96.8 MW_m/96.8 MW_e with 31 turbines.

The Project is subject to conducting a National Environmental Impact Assessment (EIA) study in regard with the Regulation on Environmental Impact Assessment¹ of Türkiye. According to the Regulation, the Project is covered under Article 41 -Wind power plants- of *Annex-1: List of Projects Subject to Environmental Impact Assessment*. In this sense, a National EIA Report was prepared for the Project by an environmental consultancy company, namely En-Çev (with a competency certificate dated 12 October 2010 and numbered 70). The Final National EIA Report was submitted on 21 January 2021 by En-Çev. 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 Affirmative decision of the Balabanlı WPP Capacity Extension Project was obtained on 21 January 2021 for capacity extension which is additional 10 wind turbines with 35.4 MW_m/35.4 MW_e total installed power.

Since the number of the turbines has been decreased from 10 to 6 and the turbine coordinates have been changed within the same Project area after securing the “EIA Affirmative” decision, MoEUCC will be notified about the final revisions and an approval will be obtained without preparation of a new Project Design Document or EIA Report for final total installed capacity of 96.8MW_m/96.8Mwe. Notification process is ongoing, and approval is expected to be obtained in July 2024.

The Project Company was Balabanlı Rüzgar Enerjindeki Elektrik Üretim A.Ş., a subsidiary of Borusan ENBW Enerji Yatırımları ve Üretim A.Ş. The companies merged under BEE in 2023 and the Capacity Extension has been planned by Borusan ENBW Enerji Yatırımları ve Üretim A.Ş.

The “EIA Affirmative” decision (dated 21 January 2021 and numbered 6154) of the Project, was obtained by Balabanlı Rüzgar Enerjisinden Elektrik Üretim A.Ş, a subsidiary of Borusan ENBW Enerji Yatırımları ve Üretim A.Ş. These two companies merged under Borusan ENBW Enerji Yatırımları ve Üretim A.Ş. in 2023 and the Project is transferred to Borusan ENBW Enerji Yatırımları ve Üretim A.Ş. Therefore, with the official decision letter of General Directorate of Environment, Urbanization and Climate Change dated 27 September 2023 and numbered E-

¹ Published in the Official Gazette Date/No: 29.07.2022/31907

53549773-220.99-7808072, EIA Affirmative decision was transferred to Borusan ENBW Enerji Yatırımları ve Üretim A.Ş. from Balabanlı Rüzgar Enerjisinden Elektrik Üretim A.Ş.

The Project Company has secured the "49-year Electric Power Generation Licence" (Licence No. EÜ/3144-4/1900, dated 31 March 2011) from Energy Market Regulatory Authority (EMRA) for the Balabanlı WPP with 25 turbines. After the capacity extension of Balabanlı WPP, the licence with Licence No. EÜ/3144-4/1900 was terminated, and a new Electric Power Generation Licence (Licence No. EÜ/11974-10/05736) for 36 years, 8 months and 4 days was secured from the EMRA by the Project Company on 27 July 2023. The new licence is granted as a continuation of the previous one. License amendment process is ongoing for final revision layout. The Project Company is expected to be obtained renewed production licence at the end of July 2024.

Mott MacDonald Türkiye ("the Consultant") has been appointed by the Project Company to undertake an ESIA Study to identify the impacts that are likely to occur due to implementation of construction and operation activities under the scope of the Project.

The Project Company is seeking an international finance loan from the International Financial Institutions (IFIs) regarding implementation of the Project and proposed the Project to the potential IFIs for financing. The Project Lenders set requirements to 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.

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

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

1.2 Objectives and Scope of the Stakeholder Engagement Plan

Within the scope of the ESIA process, this Project-specific SEP covering the pre-construction, construction and operation phases is prepared by the Consultant. 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. As per documents shared by the Project Company, it is seen that the stakeholder engagement activities conducted so far within the scope of current operational activities 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 WBG EHS Guidelines requirements.

1.3 Project Location and Social Area of Influence

The social area of influence (AoI) of the Project covers a total of five neighbourhoods, two in Muratlı district and three in Çorlu district of Tekirdağ province. These are the nearest settlements to the Project area including Balabanlı and Çevrimkaya neighbourhoods in Muratlı district and Yenice, Deregündüzlü, and Maksutlu neighbourhoods in Çorlu district.

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

- Local community members whose livelihoods (mainly based on agriculture) have the potential to be significantly and adversely affected due to land acquisition and/or expropriation,
- Local community members who use these roads for mainly for agricultural activity, and are likely to be exposed to increased traffic volume, dust, noise and road safety risks,
- Local community members who may benefit from the Project's local employment opportunities,
- Vulnerable groups who may be in need for essential consultation in the Project, and
- All construction phase workers employed within the scope of the Project (including subcontractors).

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

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

1.4 Expected Project Impacts and Summary of Mitigations

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

Table 1.1: Summary of the Project's Social Impacts

Impact Subject	Impact Description	Receptor	Phase of the Project	Mitigation Measures
Population	It is critical that the Project workers coming to the region from outside are oriented in accordance with the social codes of the neighbourhood and integrated into daily life.	Local community members / Local communities / Project affected neighbourhoods	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 ● Traffic Management Plan ● Road safety, traffic regulations and speed limit trainings for workers within and near the Project area
	Increased traffic volume during the construction phase throughout the access roads to the Project area may result in road traffic safety risks.			
	During the operation phase, the turbines will produce noise from their mechanical and electrical components, as well as from the aerodynamic effects of the blades. Residents whose houses are close to the turbines may be affected from the noise during the operation phase.		Operation	<ul style="list-style-type: none"> ● Noise Management Plan (NMP) ● SEP, continuous consultation, and engagement through the 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 lands may be impacted economically since their livelihood activities become limited or totally lost.	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 ● Human Rights Impact Assessment (HRIA) ● Social Responsibility and Community Development Plan
	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.		Operation	<ul style="list-style-type: none"> ● Livelihood Restoration Plan (LRP)

Impact Subject	Impact Description	Receptor	Phase of the Project	Mitigation Measures
Local Economy, Livelihood Sources and Employment	It is important to consider the harvest and cultivation dates of the agricultural products to reduce the risk of dust and loss of livelihood during the construction activities.	Local community members whose livelihoods are based on agriculture	Construction	<ul style="list-style-type: none"> ● SEP, continuous consultation, and engagement through the CLO ● Community grievance mechanism ● LRP ● HRIA ● Social Responsibility and Community Development Plan ● Air Quality Management Plan
	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 / Local communities / Project affected neighbourhoods		<ul style="list-style-type: none"> ● Local employment and procurement strategy ● SEP, continuous consultation, and engagement through the CLO ● Social Responsibility and Community Development Plan
	During the construction phase of the Project, there will be numerous procurement opportunities which may be beneficial for the local businesses, enterprises and suppliers in terms of income generation and increase.	Local community members / Local businesses, enterprises and suppliers		<ul style="list-style-type: none"> ● Community grievance mechanism ● HRIA
Infrastructural Services	The operation of infrastructure facilities is of great importance for the people living in that region to continue their daily lives. Consideration will be given to ensuring that the infrastructure system is operational throughout the construction period.	Local community members / Project affected neighbourhoods	Construction	<ul style="list-style-type: none"> ● SEP, continuous consultation and engagement through the 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	<p>The Project may improve the gender equality through local employment of both women and men residing in the Project affected neighbourhoods.</p> <p>Land acquisition activities will be conducted with the equity and equality perspective, in which all Local community members are approached without any discrimination due to their gender and other characteristics.</p>	Local community members	Construction	<ul style="list-style-type: none"> ● Trainings and Code of Conduct for workers ● Awareness raising activities for the Project affected neighbourhoods ● Specific meetings with women in the Project affected neighbourhoods ● SEP, continuous consultation and engagement through the CLO ● Community grievance mechanism

Impact Subject	Impact Description	Receptor	Phase of the Project	Mitigation Measures
	Throughout the construction activities, it is necessary to take measures against the gender-based violence and harassment (GBVH) risks.			<ul style="list-style-type: none">● Community Health, Safety and Security Procedure● Company GBVH Policy
Vulnerable Groups	All construction activities will be carried out considering the vulnerabilities of existing groups (i.e., the elderly local community members, local community members with chronic health problems like asthma) to prevent their daily life practices and/or access to certain services (i.e., health facilities in the district) to be affected disproportionately and negatively due to Project impacts.	Local community members who are in a more disadvantaged position	Construction	<ul style="list-style-type: none">● Trainings and Code of Conduct for workers● SEP, continuous consultation, and engagement through the CLO● Community grievance mechanism● Human Rights Impact Assessment (HRIA)● Community Health, Safety and Security Procedure

Source: Scoping ESIA Study Report of the Project

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

The major adverse impacts of the Project during the construction phase are assessed as land acquisition and expropriation, dust, noise, and traffic generation. When looking at the impacts of the Project on resettlement and livelihoods, it can be seen that there has been no economic or physical displacement occurred so far. Considering the current planning of the Project, physical displacement is not expected while economic displacement will occur.

Operation phase adverse impacts that are assessed within the scoping report of the ESIA study are related to noise and visual impacts (i.e., shadow flicker, ice and blade throw).

2 Stakeholder Engagement Requirements

2.1 Overview

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

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

As the international standards and requirements (particularly IFC PS1, EBRD PR10, EP IV Principles 5 and 6, and WBG Environmental, Health and Safety (EHS) Guidelines 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, EBRD PR10, EP IV Principles 5 and 6, and WBG Environmental, EHS Guidelines, stakeholder engagement has started during the National EIA process of the Project through engagement with the key project stakeholders. 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, EBRD PR10, EP IV Principles 5 and 6, and WBG Environmental, Health and Safety (EHS) Guidelines 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 National 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 February 2020. 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 Affirmative” 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 – Labour and Working Conditions: PS 2 recognises that a balance between economic growth and workers' fundamental rights is needed. The objectives are: (i) to promote a non-discriminative, equal working environment for workers; (ii) to maintain and improve the worker-management relationship; (iii) to ensure compliance with national labour and employment laws; (iv) to protect vulnerable workers; to promote a safe and healthy working environment and the health of workers; lastly, (v) to protect the workforce by addressing child labour and forced labour.
 - 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 2 – Labour and Working Conditions: PR 2 recognises that workforce is a valuable asset for the Client and its business activities, and that effective human resources management and a reliable worker-management relationship based on respect for workers' rights, including freedom of association and right to collective bargaining, are key pillars for ensuring the sustainability of business activities.

- 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.

● WBG EHS Guidelines

EHS Guidelines for Wind Energy:

- Environment
- Occupational Health and Safety
- Community Health and Safety

The ESIA study to be performed will assess the possible impacts that may arise due to each of the listed EHS issues related with onshore wind energy facilities; and put forth necessary mitigation measures reliant with the performance indicators covered in the subject guidelines.

● EHS Guidelines for Electric Power Transmission and Distribution

The EHS Guidelines for Electric Power Transmission and Distribution provide information related with power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial, and industrial areas. The guidelines focus on risks and impacts that may arise during the construction of power transmission and distribution projects and present mitigation measures and performance indicators regarding environment (i.e., terrestrial habitat alteration, electric and magnetic fields, and hazardous materials), OHS (i.e., live power lines, working at height, electric and magnetic fields, and exposure to chemicals), and community

health and safety (i.e., electrocution, visual amenity, electromagnetic interference, noise and ozone, and aircraft navigation and safety) related issues.

2.2.3 Applicable Policies and Management Systems of the Project Company

A corporate level SEP, which has been prepared by the Project Company, is in place since August 2023. The Corporate SEP defines the disclosure approach, commitment to meaningful consultation and participation and ongoing reporting to external stakeholders of the Project Company.

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

- ISO 9001: 2015 - Quality Management System
- ISO 14001: 2015 - Environmental Management System
- ISO 45001: 2018 - Occupational Health and Safety Management
- ISO 50001: 2018 - Energy Management System
- ISO/IEC 27001: 2013 - Information Security Management System
- ISO 55001 – Asset Management System
- ISO 10002:2018 - Customer Satisfaction
- ICS 27.10 - Wind Turbine Energy Systems Standard Family

In addition, the Project Company has the following policies, which are disclosed at the website²:

- Social Policy
- Quality Policy
- Procurement Policy
- Health, Safety, Environment and Energy Policy
- Human Resources Policy
- Information Security Management Policy

Apart from the above-mentioned policies and management systems, the Project Company have Stakeholder Management and Grievance Mechanism Plan, Community Health and Safety Management Plan, Livelihood Restructuring Management Plan and Land Acquisition and Resettlement Action Plan. In addition, the Corporate Social Responsibility Plan, which covers guidelines for social support for community benefit, facility-based plans and implementation and social management system, is applied at all facilities of the Project Company.

² <https://www.borusanenbw.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, Table 3.3 and Table 3.4 below. All stakeholders are categorized and colour-coded as high (red), medium (yellow) or low (green) depending on magnitude of the stakeholders' being affected by and/or affect the Project as well as their level of interest to 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 may have specific views about the design, construction, and operation activities of the Project.	Medium
	MoAF, General Directorate of Food and Control		
	MoAF, General Directorate of Livestock		
	MoAF, General Directorate of Fisheries and Aquaculture		
	MoAF, General Directorate of Nature Conservation and National Parks		

GOVERNMENTAL BODIES

Level	Organization	Relation to the Project	Level of Interest
	MoAF, General Directorate of State Hydraulic Works	MoEUCC has regulatory functions in relation to the Project such as environmental impact assessment permits and environmental permitting.	Medium
	MoAF, General Directorate of Water Management		
	Ministry of Environment, Urbanization and Climate Change (MoEUCC)		
	MoEUCC, General Directorate of EIA, Permit and Audit		Medium
	MoEUCC, General Directorate of Environmental Management		
	MoEUCC, General Directorate of Infrastructure and Urban Transformation		
	MoEUCC, General Directorate of Spatial Planning	MoTI may have specific views regarding evaluation of the Project.	Medium
	MoEUCC, General Directorate of Protection of Natural Assets		
	Ministry of Transport and Infrastructure (MoTI)		
	MoTI General Directorate of Infrastructure Investments	MoLSS may have specific views on labour and working conditions, and health and safety of the Project personnel.	Low
	MoTI General Directorate of Highways		
	Ministry of Labour and Social Security (MoLSS)	MoCT may have views in terms of legislation.	Low
	MoLSS, General Directorate of Labor		
	MoLSS, General Directorate of Occupational Health and Safety	This organization may have specific views about water courses running close to the Project area.	Low
	Ministry of Culture and Tourism (MoCT)		
Regional	MoCT General Directorate of Cultural Heritage and Museums	This organization may have specific views on the potential protected areas close to the Project area and the status of the trees in the Project area.	High
	11 th Regional Directorate - 113 th Branch Directorate of DSI (State Hydraulic Works)		
	1 st Regional Directorate of Ministry of Agriculture and Forestry		
Provincial and District	1 st Regional Directorate - 18 th Branch Chief of General Directorate of Highways	The organization may provide opinion regarding road crossing within the Project area.	High
	The Governorship of Tekirdağ	The governorships representing the national government are the highest authorities in the provinces.	High
	Tekirdağ Provincial Directorate of Planning and Coordination	This organization coordinates all kinds of investment and construction works to be carried out by ministries and other central government organizations in the provinces.	High
	Tekirdağ Metropolitan Municipality	The municipality and its relevant departments will have responsibilities in relation to the Project.	High
	Tekirdağ Metropolitan Municipality, Directorate of Environmental Protection and Control		
	Tekirdağ Metropolitan Municipality, Directorate of Zoning and City Planning		

GOVERNMENTAL BODIES

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

Table 3.2: External Stakeholder List for Non-Governmental Bodies

NON-GOVERNMENTAL BODIES

Level	Organization	Relation to the Project	Level of Interest
Provincial and District	Turkish Wind Energy Association	These foundations, associations, and chambers may provide their specific views related to the Project	High
	Türkiye Foundation for Combating Erosion, Afforestation and Protection of Natural Assets (TEMA)		
	Environmental Protection and Research Foundation (ÇEV-KOR)		
	Turkish Environmental Protection Foundation (TUÇEV)		
	Turkish Nature Conservation Association		
	Foundation for the Protection and Promotion of Environmental and Cultural Values (ÇEKÜL)		
	World Wide Fund for Nature (WWF) Türkiye		
	Bird Life International Türkiye Partner- Doğa Association		
	The Nature Conservation Centre		
	Resource, Environment and Climate Association (REC)		
	Ecological Research Society (EKAD)		
	Greenpeace Akdeniz Türkiye		
	Association for Sustainable Economics and Finance Research (SEFiA)		
	Thrace Environmental Association		
	Tekirdağ Nature and Animal Lovers Association		
	Tekirdağ Animal and Nature Protection Association		
	Tekirdağ Animal Protection Association		
	Thrace Canary and Nature Birds Association		
	Tekirdağ Chamber of Merchants and Craftsmen Union		
	Tekirdağ Chamber of Commerce and Industry		
	Tekirdağ Chamber of Agriculture		
	Çorlu Chamber of Merchants and Craftsmen		
	Çorlu Chamber of Commerce and Industry		
	Çorlu Chamber of Agriculture		
	Muratlı Chamber of Merchants and Craftsmen		
	Muratlı Chamber of Agriculture		
	Muratlı Honey Producers Association		
	Çorlu Nature and Environment Protection Association		
	Çorlu Beekeepers 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 the five Project affected neighbourhoods (Çevrimkaya, Maksutlu, Yenice, Balabanlı, Deregündüzlü)	Neighbourhoods are key stakeholders considering potential impacts of the Project.	High
	Local businesses and enterprises (Local shops, beekeepers, income-generating agricultural lands)		
	Local communities using the License Area for agriculture and animal husbandry purposes		
Vulnerable/ Disadvantaged Groups	Women	Vulnerable groups are key stakeholders considering	High
	The landless/homeless people		

STAKEHOLDER GROUPS

Level	Group	Relation to the Project	Level of Interest
	The elderly	potential impacts of the Project.	
	Students		
	People with disabilities		
	Unemployed people		
	Syrians under temporary protection (SuTP)		
	Refugees under international protection (UIP)		
Media	Local, regional, and social media (including newspapers, TV stations, social media channels)	It is important to engage with local and regional media organizations for effective public disclosure and consultation.	Medium
Universities	Tekirdağ Namık Kemal University	Universities are one of the key stakeholders when research needs to be conducted within the scope of the Project.	Medium

Table 3.4: Internal Stakeholder List

INTERNAL STAKEHOLDERS

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

4 ESIA Consultation Activities and Outcomes

4.1 Overview

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

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

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

Correspondence / Opinion Letters

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

- Ministry of Energy and Natural Resources General Directorate of Renewable Energy Affairs
- Ministry of Energy and Natural Resources General Directorate of Mining and Petroleum Affairs
- Ministry of Agriculture and Forestry, General Directorate of Nature Conservation and National Parks
- Ministry of Agriculture and Forestry, General Directorate of State Hydraulic Works
- Ministry of Agriculture and Forestry, General Directorate of Meteorology
- Ministry of Agriculture and Forestry, General Directorate of Forestry
- Ministry of Transport and Infrastructure, General Directorate of Highways
- Ministry of Culture and Tourism, Edirne Cultural Heritage Preservation Regional Board Directorate
- Tekirdağ Governorship, Provincial Directorate of Environment, Urbanization and Climate Change
- Tekirdağ Governorship Provincial Disaster and Emergency Directorate
- Tekirdağ Governorship Provincial Directorate of Agriculture and Forestry
- Tekirdağ Metropolitan Municipality, Department of Technical Affairs
- Tekirdağ Metropolitan Municipality, Department of Environmental Protection and Control

The official correspondences conducted within the scope of environmental and social studies were provided in the final National EIA Report which was shared with the Consultant. The information of the official letters is shared in Appendices Section A of the ESIA report.

Within the scope of the National EIA studies, social impact assessment study was also conducted. Public participation meetings carried out in Tekirdağ province, Muratlı district, Balabanlı neighbourhood, within the scope of the National EIA Studies. Public participation meeting was conducted on 13 February 2020 in Tekirdağ. This meeting aimed to engage with the public, provide information about the Project, and gather their feedback regarding the

Project. The discussions held during these meetings were documented in final National EIA report.

At the public participation meeting in Tekirdağ, after the opening speech was made by the Deputy Director of Tekirdağ Provincial Directorate of Environment and Urbanization, the Project Company made a presentation about the Project to local people.

At the end of the presentation of the public participation meeting, the meeting was opened to the public's questions and comments. It was stated that informing the people of the region within the scope of the Project was sufficient due to their familiarity with WPP and any concern or comments were not raised.

As a part of the ESDD studies, five mukhtars of the Project affected neighbourhoods (namely Balabanlı, Maksutlu, Yenice, Çevrimkaya, and Deregündüzlü) were consulted by the ESDD Consultant in December 2023. It was stated in the Final ESDD Report that the Project Company regularly engages with the local community members. Additionally, it was noted that local community members are aware of the community grievance mechanism and use the communication channels (i.e., face-to-face interaction, phone calls) to report their requests and/or grievances. The Project Company registers the stakeholder engagement activities, requests, and grievances.

4.3 Stakeholder Engagement Activities during ESIA (January & March 2024)

The Consultant conducted a site visit on 29-30 January 2024 and 18-20 March 2024 within the scope of the ESIA study of the Project. The aim of the site visit in January 2024 included collecting baseline data about the Project affected neighbourhoods, understanding the Project-related concerns and expectations of the local community members, reflecting the views of key stakeholders, and identifying vulnerable groups. In line with these aims, mukhtars and local residents were consulted during the site visit in order to identify local community members and other Project stakeholders, understand their perceptions about the Project, address any concerns they may have about the Project, and identify the Project impacts. The external stakeholders interviewed during the field studies are listed below:

- Çorlu District Directorate of Agriculture and Forestry
- Muratlı District Directorate of Agriculture and Forestry
- Mukhtar and residents of Çevrimkaya neighbourhood
- Mukhtar and member of the mukhtar office (Aza in Turkish) of Deregündüzlü neighbourhood
- Mukhtar and member of the mukhtar office (Aza in Turkish) of Maksutlu neighbourhood
- Mukhtar of Yenice neighbourhood
- Mukhtar of Balabanlı neighbourhood

The main findings of these consultations are summarized below:

- The majority of the consulted mukhtars and residents has been aware of the Project since the public participation meeting held in 2020. They also have a close communication with the Project Company since the existing WPP facilities has been in operation for around 10 years.
- Mukhtars reported some grievances related to noise impacts of the existing WPPs. They stated that the noise occurs depending on the wind direction, time, and season. In addition, they stated that the new roads constructed for the existing WPPs affected the water flow direction as a result of the inclination. Eventually, the water started flowing throughout the agricultural lands, which affected the soil quality as well as the products. Another grievance raised by the mukhtars was about the adverse impacts of fragmentary land acquisition. Accordingly, since only the needed amount of land is acquired, the remaining land becomes

small and inadequate to perform agricultural activities due to fragmentation. The solution suggested by the mukhtars was bulk land acquisition and/or expropriation.

- The consulted stakeholders had some concerns regarding the beekeeping activities, changing climate conditions, drought, and possibility of changing bird routes due to the Project as well as the existing WPPs.
- According to the Project Company representatives, received grievances/feedbacks related to the potential local support coming from stakeholders who directly applied to the Project Company are solved.

The following development areas were suggested and/or expected by the consulted stakeholders:

- Providing seedling support for the farmers in Muratlı and Çorlu districts.
- Providing support for the beekeepers in Muratlı and Çorlu districts through hive supply, and awareness raising trainings.
- Creating local employment opportunities for the youth and unemployed in the nearby neighbourhoods.
- Providing support to construct or improve the facilities in the neighbourhoods such as coffee house, mosque, school, water pool for agricultural activities, social facility for weddings and funerals in the nearby neighbourhoods.

The second site visit has been completed in March 2024 to understand and assess land transaction activities within the scope of the Project. Interviews have been conducted with the mukhtars of the five Project affected neighbourhoods and landowners/land users covering 17 different Project Affected Persons (PAPs) and corresponding to approximately 25 different parcels. Furthermore, the ownership/use status of these parcels were analysed. Considering that some individuals perform agricultural activities on multiple affected lands, the number of affected households is expected to be fewer than the number of parcels in terms of livelihood activities. Further evaluation is needed to determine the precise number of PAPs due to ongoing land lawsuits and expropriation processes.

The main findings of these consultations are summarized below:

- A number of PAPs had limited or no knowledge about the Project's land acquisition activities. They were informed about the issue by both the Project Company representatives as well as the Consultant during the interviews.
- Majority of the PAPs had experienced expropriation process deriving from previous activities of the Project Company in the region. The previous process had been performed in accordance with only the national legislation. The PAPs reported that the process had been completed in a disadvantageous way for them due to lower amounts of compensation/payment than the actual value of their lands. They raised some concerns related to the land acquisition activities of the Project. They were informed about the Lender's standards on these processes.
- Some of the consulted PAPs raised grievance related to partial expropriation which negatively affect their livelihood activities and daily practices.

Site visit observations concluded that landowners are currently cultivating and harvesting crops. If agricultural activities are disrupted and/or adversely affected by the construction activities of the Project, the Project Company has committed to compensating affected parties from its market share.

No significant cases of economic displacement were interpreted during the site visit, as the land to be purchased/expropriated is not only and main source of livelihood for any interviewed

PAPs. Details regarding the impact magnitude and proposed mitigation measures will be outlined in the Livelihood Restoration Plan as well as the ESIA Report.

Illegal cabins (tiny houses) were constructed outside the Project Company's expropriation area identified during the land acquisition process. Similarly, there is no structure within the swept area of the new turbines. When viewed from Google Earth, it is possible to see other cabins nearby. However, they are a component of the turbine (kiosk building). These are within the swept area and are within the scope of the Project. Illegal cabins are outside the swept area.

Negotiations can be held with the owners of the tiny houses in the area within the scope of community health and safety aspect of the Project. If interviews cannot be conducted due to the difficulty of reaching the people, a short information note explaining the risks associated with community health and safety risks can also be left in these illegally placed cabins.

Cabins constructed without any legal basis are not covered by IFC PS5 in the Project Company's land transactions.

4.4 ESIA Public Disclosure and Consultation

A disclosure package of the Project that includes the ESIA Report together with the SEP, Non-Technical Summary (NTS) and Environmental and Social Management Plan (ESMP) (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 will be determined in agreement with the Lenders upon final categorisation of 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 with the mukhtars of the Project affected settlements via an information briefing that involves a summary about the ongoing ESIA process as well as communication channels that the Project stakeholders can report their opinions and comments about the Project. 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/CLO, e-mails to the Project Company, grievance and suggestion boxes located at the local teahouses and mukhtars' offices in the Project affected villages.

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 regularly during both construction and operation in order to ensure that it remains valid and meets the needs of the Project.

The Project will follow a gender-sensitive approach, which is also reflected to the SEP and its content on the consultation activities. Gender aspect will be considered in the implementation of the SEP through a gender inclusive and participatory point of view.

5.2 Community Liaison Officer (CLO)

The main point of contact for the Project stakeholders will be the CLO. Accordingly, disclosure, consultation and engagement activities of the Project will also be managed by the CLO on the basis of the stakeholder engagement and consultation program defined in the SEP and Table 5.1 below. The CLO will also be responsible for registering the stakeholder engagement and consultation activities into the Project-specific consultation log. Sample consultation log is provided in Appendices Section 9.1.

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

5.3 Stakeholder Engagement and Consultation Program

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

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

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible
Local Communities					
1	Residents in the Project Affected Settlements (Balabanlı, Çevrimkaya, Yenice, Deregündüzlü, Maksutlu)	<ul style="list-style-type: none"> ● Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project, provisions to prevent the risks of GBVH ● Outline the mitigation measures identified in the ESIA report 	<ul style="list-style-type: none"> ● Face-to-face consultation meetings ● Regular visits ● Disclosure of ESIA report, SEP, PID/brochure and other Project related documents 	<ul style="list-style-type: none"> ● At least monthly (and when needed) during construction ● Quarterly during operation 	<ul style="list-style-type: none"> ● CLO ● Project Company
	Local communities using the License Area for agricultural and animal husbandry purposes	<ul style="list-style-type: none"> ● Inform about the local employment and procurement ● Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.) 	<ul style="list-style-type: none"> ● Website announcements ● Social media announcements ● Announcements through posters/ billboards/ press release 		
	Local Businesses and Enterprises				
2	Mukhtars of the Project Affected Settlements (Balabanlı, Çevrimkaya, Yenice, Deregündüzlü, Maksutlu)	<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, SEP, PID/brochure and other Project related documents ● Website announcements ● Social media announcements ● Announcements through posters/ billboards/ press release 	<ul style="list-style-type: none"> ● At least monthly (and when needed) during construction ● Quarterly during operation 	<ul style="list-style-type: none"> ● CLO ● Project Company

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible
3	Vulnerable Groups (Women, the landless/homeless people, the elderly, students, people with disabilities, unemployed people, SuTP, refugees UIP)	<ul style="list-style-type: none"> ● Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, informing about grievance mechanism of the Project, provisions to prevent the risks of GBVH ● Specific interest to receive their grievances (if there are any) since they may not be able to use the grievance channels ● Outline the mitigation measures identified in the ESIA report ● Inform about the local employment and procurement ● Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.) 	<ul style="list-style-type: none"> ● Face-to-face consultation meetings ● Regular visits ● Disclosure of ESIA report, SEP, PID/brochure and other Project related documents ● Website announcements ● Social media announcements ● Announcements through posters/ billboards/ press release ● Specific meetings held with women groups and other particular vulnerable groups 	<ul style="list-style-type: none"> ● Bi-monthly during construction ● Semi-annually during operation 	<ul style="list-style-type: none"> ● CLO ● Project Company
Governmental Bodies					
4	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, SEP, PID/brochure and other Project related documents ● Correspondence 	<ul style="list-style-type: none"> ● Annually during construction ● When needed during operation 	<ul style="list-style-type: none"> ● CLO ● Project Company
5	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, SEP, PID/brochure and other Project related documents ● Correspondence 	<ul style="list-style-type: none"> ● When needed during construction and operation ● Annually during operation 	<ul style="list-style-type: none"> ● CLO ● Project Company

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible
6	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, SEP, PID/brochure and other Project related documents Correspondence 	<ul style="list-style-type: none"> When needed during construction and operation Annually during operation 	<ul style="list-style-type: none"> CLO Project Company
Universities					
7	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, SEP, PID/brochure and other Project related documents Website announcements Correspondence 	<ul style="list-style-type: none"> When needed during construction and operation 	<ul style="list-style-type: none"> CLO Project Company
NGOs					
8	NGOs	<ul style="list-style-type: none"> Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project Outline the mitigation measures identified in the ESIA report 	<ul style="list-style-type: none"> Face-to-face consultation meetings Regular visits Disclosure of ESIA report, SEP, PID/brochure and other Project related documents 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"> CLO Project Company

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

6 Project Grievance Mechanism

6.1 Overview

The Project Company is required to establish an effective and accessible Project specific 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 Corporate level SEP that has been in place since August 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 E-Makin system of the Project Company, which is used for documentation and workflow management. Sample of the grievance register form is presented in Appendices Section 9.2.

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, EBRD PR10, EP IV Principles 5 and 6, and WBG EHS Guidelines), 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.

6.3 External Grievance Mechanism

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

- Verbal statements during face-to-face meetings/visits
- Phone calls to the Project Company/CLO
- Petitions
- Grievance boxes located at the centre in Project affected neighbourhoods (These boxes will be checked by the CLO on a weekly basis and registered to the grievance log immediately.)
- E-mails to the Project Company

The steps listed below summarize the external grievance mechanism process:

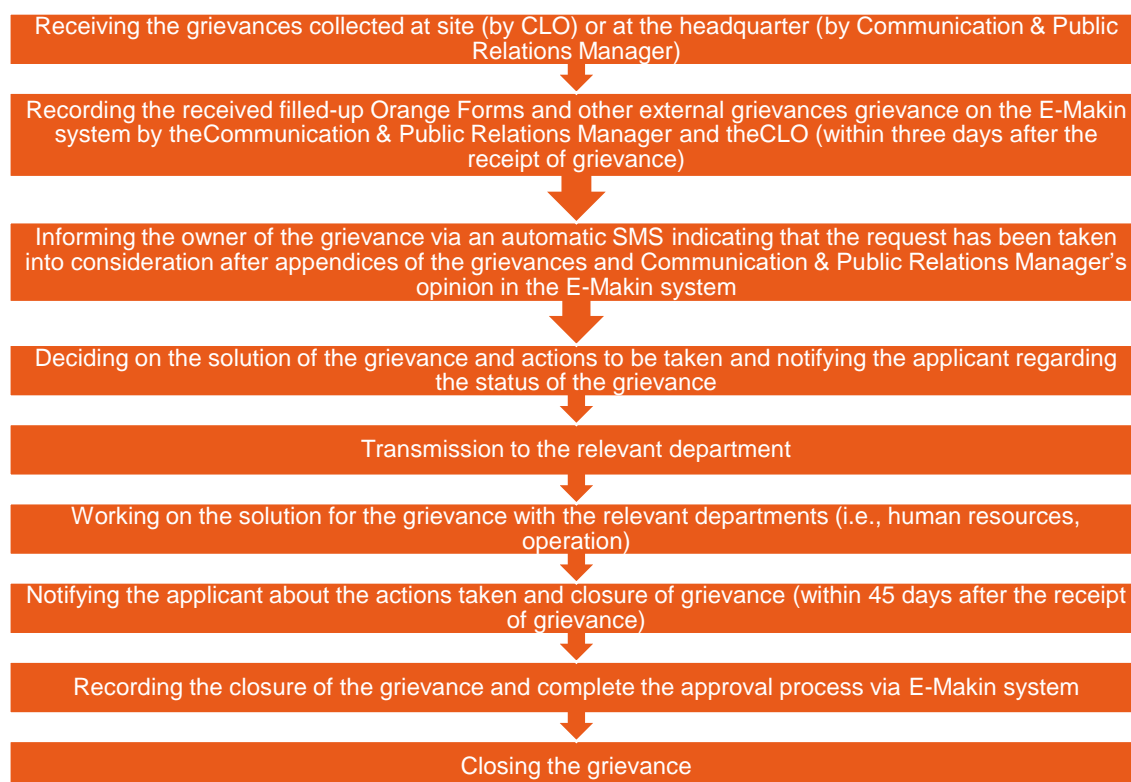


Figure 6.1: Steps of the External Grievance Mechanism Process

Sample grievance log to be utilized by the Project Company throughout the Project is provided in Appendices Section 9.

As part of the Project's external grievance mechanism:

- The Project CLO will manage and monitor the grievance mechanism process in a close way since s/he is the main contact point on site for the stakeholders.
- In general, grievances are estimated to be resolved and closed within 45 days after the receipt. However, 30 days are more applicable according to the good international practices. In addition to this, the timeline can change depending on the nature, subject and scope of the grievance. 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 days after the receipt of the grievance. For the grievances with medium priority, timeline will be 15 days and the grievances that are prioritized as low will be resolved within 30 days.

6.4 Internal Grievance Mechanism

Internal grievance mechanism covers the grievances of all employees working under the Project Company. Grievances from contractors or sub-contractors will be managed under external grievance mechanism. The Project Company has formal employee grievance mechanisms and, 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 Orange ethics hotline, e-mail address, and a system named Transparent Chair provided by the Project Company, which allows employees to raise their questions and grievances anonymously, employee committee meetings, reporting grievances to the managers and Human Resources Department representatives verbally or in a written way, E-Makin System of the Project Company, and grievance boxes placed at the Project mobilization areas.

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, 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.

Grievance Mechanism Channels

- Official letter and/or petition to:
 - The Head Office (Pürtelaş Hasan Efendi Mah. Meclis-i Mebusan Cad. No: 35/37 Salıpazarı, 34427 Beyoğlu/İstanbul), or
 - The Project Administration Office (Çorlu İlçesi Maksutlu Mah. Rüzgarlı Sok. No: 5, 59850 Çorlu/Tekirdağ)
- Transparent Chair:
 - Website: <https://www.beesoru.com/>
 - Phone number of the Head Office: (0212) 340 27 60- 286 39 85
- The Project specific e-mail address: www.balabanlienerji.com.tr

Contact Details of the CLO

Telephone- Balabanlı WPP (Site): (0282) 261 91 49
Community Liaison Officer (Site): Yusuf BAL (Operation)
Community Liaison Officer (Site): Mustafa Şans (Construction)

Ethical Violation Declaration Channels

- E-mail address: orangeethics@borusan.com
- Website: www.orangeethics.com

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 WBG Environmental, Health and Safety (EHS) Guidelines.

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

- Conducting stakeholder engagement and disclosure activities with stakeholders
- Following the grievances and requests from registration through the resolution process
- 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 pre-construction, construction, and operation phases of the Project are listed below with the explanation of their responsibilities:

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 CLO

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.

This SEP is a live document; therefore, it will be reviewed and updated regularly by including the stakeholder engagement activities carried out during the pre-construction, construction, and 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 CLO 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

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 Sample Project Consultation Log

No	Date	Engagement Channel (i.e., phone call, face-to-face, consultation)	Authorized Person Conducting the Activity (i.e., CLO, Project Company representatives)	The Subject of the Engagement/Consultation Activity (i.e., current Project status, information disclosure, regular visit)	Type and Name of the Stakeholder Engaged (Community/Public, Mukhtar, etc.)	Number of Stakeholders Engaged	Meeting Place and Time	Notes from the Activity (i.e., employment requests, road safety grievances)	Comments/Feedback of the Authorized Person (i.e., CLO, Project Company representatives) after the Engagement
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									

9.2 Sample 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	
Neighborhood/ 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 neighborhood/community <input type="checkbox"/> Demanding any supports for local authorities <input type="checkbox"/> Other: Please specify	
E. Actions Recommended	

9.3 Sample Project Grievance Log

Registration number	Date of receipt and registration	How is the grievance received? (via Grievance Form, community meeting, telephone etc.)	Name of the responsible staff receiving grievance	Information about the applicant (Leave blank if application is anonymous)				Grievance category	Description of the grievance	Priority of the grievance (High, Medium, Low	Due date of the addressing the grievance	Responsible person/ department for follow-up	Grievance status (open, closed, pending)	Action planned	Date of action taken	Supporting documents for grievance closeout and resolution
				Name and surname	Gender	Telephone and/or e-mail	District									

