
NON-TECHNICAL SUMMARY

PELİT WPP



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BORUSAN ENBW ENERJİ YATIRIMLARI ÜRETİM A.Ş.

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1 What is this document?

This Non-Technical Summary (NTS) document provides an overview of the Pelit Wind Power Plant (WPP) developments based on the proceeds of financing loan to Borusan EnBW Enerji Yatırımları ve Üretim A.Ş. ("Borusan EnBW Enerji" or "BEE"). A summary of relevant potential environmental and social issues and impacts are provided related to the construction and operation of the proposed project that is presently at a total installed capacity of 80Mwe/80MWm. Appropriate measures to mitigate the key adverse environmental and social impacts that may arise during the construction and operation of the project activities are also presented within this document.

2 The Project Summary

BEE is planning to construct and operate Pelit WPP which is located near the Çiçekyurt, Davulhöyük, Reşadiye, Yılanhöyük, Kürkcü and Koyunlu Villages, Gürün District, Sivas Province, with the total installed capacity of 80MWe/80MWm with 14 turbines [(13 turbines x 5.7MWm/5.7MWe)+(1 turbines x5.9MWm/5.9MWe)]

Please see details of this project below.

Table 2-1: Details of Pelit WPP

Land Use	Total Installed Capacity	Annual Production	Turbine Number	Turbine Installed Capacity	Date of Pre-License	Date of EIA Permit	Date of ESIA
Pasture and agricultural areas	80MWm 80MWe	280Gwh/year	14	13 turbines x 5.7MWm 5.7MWe 1 turbines x 5.9MWm 5.9 MWe	23.11.2017	28.05.2018	To be prepared in 2024

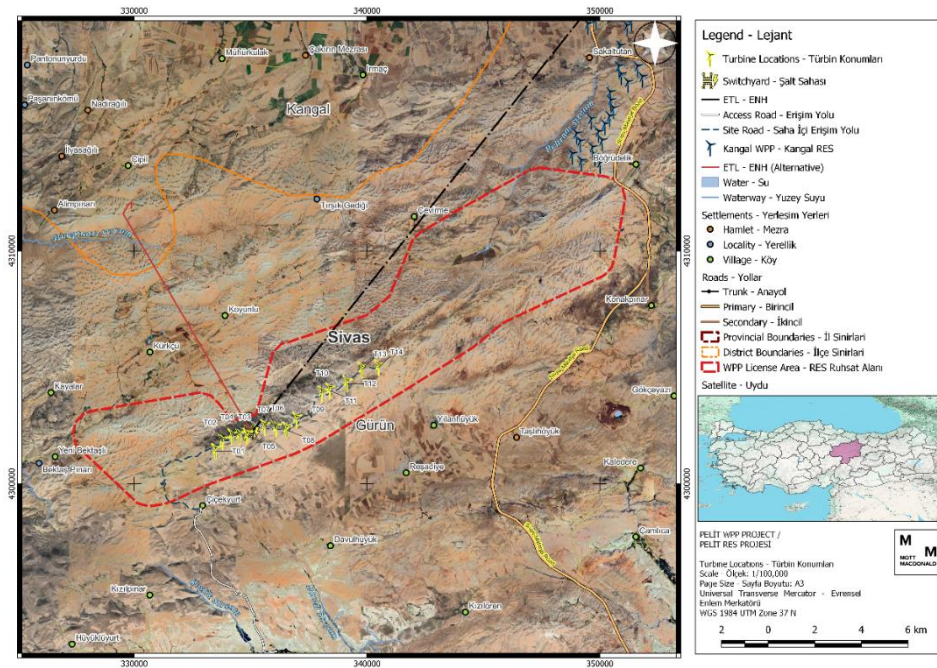


Figure 2-1: Pelit WPP Project General Overview

3 Project Finance

The Pelit wind power plant is in operation with a total installed capacity of 80MWm/80MWe. The Project bank loan (83 m USD) * will finance up to 80Mwe/80MWm of extension of Pelit WPP. Pelit WPP and Balabanlı Ext- Phase II WPP loan amount will be 120 m USD in total.

4 What Environmental and Social Studies Have Been Undertaken?

The Environmental Impact Assessment (EIA) of the Project was conducted in line with the Turkish EIA Regulation. According to the Environmental Impact Assessment Regulation (Official Gazette Date/Number: 25.11.2014/29186), wind power plants of any size are listed in Annex-I of the regulation, which requires the undertaking of an EIA process including a public consultation meeting. The EIA Regulation classifies projects into two annexes (Annex I and Annex II) based on the potential environmental impacts considering the Project's type, capacity, or location. Projects listed in Annex I are subject to a comprehensive EIA process and are required to prepare an Environmental Impact Assessment (EIA) report. In contrast, projects listed in Annex II are subject to selection-elimination criteria and are required to prepare a Project Description Document (PDD).

The evolution of Pelit WPP, along with the extension process to date, can be summarized as follows:

During the planning phase of the Project, the Project was planned 40 turbines with an installed capacity of 80MWm (40 x 2MWm). According to this, an "EIA" Report was prepared by EN-ÇEV Enerji Çevre Yatırımları ve Danışmanlığı Haritaçılık İmar İnşaat A.Ş in May 2018, and an "EIA Affirmative" decision was granted to by the Ministry of Environment and Urbanism (now the Ministry of Environment, Urbanization, and Climate Change ("MoEUCC") on May 28, 2018, for installing 40 turbines with an installed capacity of 80MWm/80MWe (40 x 2MWm).

During the feasibility studies of the initial plan, first the planned turbine number was reduced from 40 turbines x 2MWm/2Mwe (80MWm/80Mwe) to 20 turbines x 4Wm/4MWe (80MWm/80Mwe). Since the number of the turbines has been decreased and the turbine coordinates have been changed within the same project area, MoEU was notified about these revisions and an approval was obtained without preparation of a new PDD or EIA Report on December 2019 with document No: 7769212.

Since the number of the turbines has been decreased and the turbine coordinates have been changed within the same project area, MoEUCC will be notified about the final revisions and an approval will be obtained without preparation of a new PDD or EIA Report for final status 80MWm/80Mwe (13 turbines x 5.7MWm/5.7Mwe + 1 turbines x 5.9MWm/5.9Mwe) of the Project.

Subsequently, the Project is planned with 14 new turbines end, an ESIA Package (Project Specific documents; Resettlement Action Plan, Human Right Impact Assessment, Biodiversity Management Plan, Traffic Management Plan, Emergency Response Plan, Invasive Species Management Plan) will be prepared by Mott MacDonald.

BEE commissioned a third-party Environmental and Social Due Diligence (ESDD) for the Project.

The Project has been designated as a Category B project by the EBRD's 2 9 Environmental and Social Policy as the potential E&S impacts associated with the Project are assessed to be limited and can be readily addressed and managed through the implementation of the Environmental and Social Action Plan (ESAP).

The potential environmental and social impacts/risks will be mitigated through careful design and implementation of effective measures Project Non-Technical for a wide range of topics.

The potential environmental and social impacts are generally site-specific and can be avoided or mitigated by adhering to relevant Lenders' performance requirements, procedures, guidelines, and design criteria.

5 Scope of the Environmental and Social Due Diligence

The scope of work for the ESDD comprised of the following:

- 1) Proposal of a categorization of the Project according to IFC PSs, EBRD PRs and EP IV, in accordance with the potential environmental and social impacts of the Project.
- 2) Key summary of the Project's environmental and social impacts and mitigation measures.
- 3) Evaluation of the Environmental and Social Management documentation prepared for the Project and Management System implementation.
- 4) Evaluation of the Project's compliance with IFC PSs, EBRD PRs, EP IV and Turkish legislation regarding to environmental, biological, and social components.
- 5) Review of stakeholder identification, analysis and engagement policy and practices relative to IFC PSs, EBRD PRs and EP IV.
- 6) An assessment of the environmental and social baseline data to ensure that they are robust enough to inform Project design decisions; and
- 7) Development of Environmental and Social Action Plan ("ESAP"): The ESAP sets out how the gaps identified in the previously prepared Environmental Impact Assessment ("EIA") & Environmental and Social Impact Assessment ("ESIA") reports and other environmental and social studies will be addressed and/or how the associated risks will be remedied.

The ESDD was conducted with environmental, social, health and safety, labor, biodiversity experts.

6 What are the key environmental and social impacts of the Project and the proposed mitigation measures?

The following conditions were identified according to ESDD study.

- Project specific/interphase documentation needs to be developed to ensure the full implementation of the ESMS requirements during the Project activities.
- Additional assessments and baseline studies need to be conducted to comply with the Project Standards (noise/air measurements, flora & fauna survey (covering ETL location and April to September period for flora and the March-October period for fauna, cultural heritage field survey.)
- Cumulative impact assessment should be conducted taking into account the nearby projects and cumulative impacts require careful mitigation due to presence of existing and planned projects.
- Additional assessment detailed below need to be conducted to comply with the Project Standards; Visual impact assessment, Shadow flicker assessment, Blade/Ice Throw Assessment, Operational Noise modelling, Climate Change Risk Assessment, Critical Habitat assessment, Updated collision risk analysis.
- The Project currently lacks an invasive species assessment, and it is crucial to undertake an evaluation and develop a plan for monitoring and mitigating any residual impacts, including the potential introduction of invasive alien species. Discussions with the local flora expert from the BEE reveal that, as of the baseline studies, there are no invasive alien species present at the Project Site. However, it is acknowledged that these species could be introduced during the construction period through the transportation of vehicles and construction machinery. It is imperative to confirm the expert's assessment that invasive alien species are currently absent from the Project Site. Once confirmed, if necessary, the invasive alien species management

plan can be revised accordingly. This precautionary measure ensures that potential risks associated with invasive species are appropriately addressed during the construction phase.

- Since the ETL data was unavailable during the preparation of the Ecosystem Assessment Report (2017), the assessment of the ETL route was not conducted. It is recommended that updated baseline studies include a comprehensive assessment of the ETL and its alternative routes to ensure a thorough understanding of their impact.
- As per SNH (2017) guidelines, a comprehensive annual monthly bird survey program is mandated, closely adhering to the recommendations. In light of the insights from the Bird and Bat Activity Surveys Report in Autumn 2023, challenging winter weather conditions in the Project Area, and the unavailability of access roads, it is recommended to schedule the next monthly bird monitoring studies between March and November.
- BEE is required to develop a BMP that includes measures and mitigations for potential adverse impacts of Pelit WPP Project and monitoring requirements.
- BEE should assess the need for a BAP after CHA and NHA are developed.
- A carcass surveys, through evaluating bird and bat fatalities, needs to be formulated and executed for Pelit WPP operation phase based on the "Post-Construction Bird and Bat Fatality Monitoring for Onshore Wind Energy Facilities In Emerging Market Countries Good Practice Handbook And Decision Support Tool". This assessment should adhere to best practices, involving the systematic search and collection of carcasses, followed by a detailed species assessment. It must be applied to the whole WPP and the ETL.

7 How will BE communicate and engage with stakeholders?

BEE considers stakeholder engagement (including dialogue, consultation, and the disclosure of information) to be a key element of Project planning, development, and implementation and are committed to a transparent and respectful dialogue with stakeholders. BEE mapped out the potential stakeholders and their interests and developed Corporate and Project Specific Stakeholder Engagement Plans. This will ensure regular engagement with the affected people and vulnerable people, wider communities, local/national government, and non-governmental organizations, and media to inform them about project activities, plans and developments on an ongoing basis, and gather any complaints or feedback.

8 How can stakeholders make a request, complaint or inquire?

BEE has a Grievance Mechanisms procedure under Environmental Social Management System, which provide a process for all internal and external stakeholders to easily convey their complaints and suggestions and allows the Project to respond to and appropriately resolve the issues. Grievance procedures allow people to raise anonymous complaints if they wish to.

The internal and external grievances are always being registered.

You can raise requests, questions, feedback, and complaints through the contact details provided below.

The contact details for submitting grievances to BEE are provided below:

BORUSAN ENBW ENERJİ YATIRIMLARI VE ÜRETİM A.Ş.

Pürtelaş Hasan Efendi Mah.Meclisi Mebusan Cad.No:35/37
Salıpazarı / Beyoğlu İstanbul / Türkiye
Telephone : (0212) 340 27 60

Website: [Borusan EnBW - İletişim](#)

You can raise requests, questions, feedback, and complaints through the website of the company.
[Borusan EnBW - Paydaş Yönetimi ve Şikyet Mekanizması](#)

Pelit WPP (Site): Çiçekyurt Village/Gürün
Community Liaison Officer (Site): Ahmet EĞİT (Construction)