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# **Pelit Wind Power Plant (WPP) Project**

Stakeholder Engagement Plan

October 2024

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# **Pelit Wind Power Plant (WPP) Project**

## **Stakeholder Engagement Plan**

October 2024

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# 1 Introduction and Project Summary

## 1.1 Overview

An Environmental and Social Impact Assessment (ESIA) study is being conducted for the Pelit Wind Power Plant (WPP) Project (“the Project”) located in Sivas province in the eastern part of the Central Anatolia region of Türkiye.

Pelit WPP Project with 14 wind turbines and 80 MWe/MWm total installed power is planned to be implemented by Borusan EnBW Enerji Yatırımları ve Üretim A.Ş. (hereinafter referred to as the “the Project Company”, “Borusan EnBW Enerji” or “BEE”) in Sivas Province; Gürün district; Kürkcü, Koyunlu, Böğürdelik, Yılanhöyük, Yenibektaşlı, Çiçekyurt, Kayalar, and Konakpınar villages.

The Project was planned 40 turbines and 80 MWe/MWm total installed capacity.

The Project is subject to conducting a National Environmental Impact Assessment (EIA) study in regard with the Regulation on Environmental Impact Assessment<sup>1</sup> 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 Upon submission of the Final National EIA Report, The “Environmental Impact Assessment (EIA) Affirmative” decision of the Pelit Wind Power Plant (WPP) Project was obtained from Ministry of Environment, Urbanization and Climate Change (MoEUCC) General Directorate of Environment, Urbanization and Climate Change on 28 May 2018 for 40 wind turbines with 80 Mwe/MWm total installed power. During the optimization, the number of the turbines has been decreased from 40 to 20 and the turbine coordinates have been changed within the same Project area after securing the “EIA Affirmative” decision, MoEUCC notified about the revisions and an approval obtained on 11 December 2019 with the official decision letter (numbered E-290387) without preparation of a new Project Design Document or EIA Report for final total installed capacity of 80MWm/80Mwe.

Since the number of the turbines has been decreased from 20 to 14 and the turbine coordinates have been changed within the same Project area after securing the “EIA Affirmative” decision, MoEUCC notified about the revisions and an approval will be obtained with the official decision letter without preparation of a new Project Design Document or EIA Report for final total installed capacity of 80MWm/80Mwe. Notification process is ongoing, and approval is expected to be obtained in July 2024.

The “EIA Affirmative” decision (dated 28 May 2018 and numbered 5090) of the Pelit WPP Project, which is planned to be operated by Pelit Enerji was requested to be transferred to Borusan ENBW Enerji Yatırımları ve Üretim A.Ş. (hereinafter referred to as the “Project Company, “Borusan”) by the Energy Market Regulatory Board Decision dated 06 April 2023 and numbered 11779-19. Accordingly, with the official decision letter of General Directorate of Environment, Urbanization and Climate Change dated 27 October 2023 and numbered 7769212, EIA Affirmative decision was transferred to Borusan ENBW Enerji Yatırımları ve Üretim A.Ş. from Pelit Yenilenebilir Enerji ve Elektrik Üretim A.Ş. Pelit Enerji has secured the “49-year Electric Power Generation Licence” (Licence No. EÜ/10970-17/05160, dated 12 May 2022) from Energy Market Regulatory Authority (EMRA) for the Pelit WPP with 20 turbines. After transfer of the Project to the Project Company, the licence with Licence No. EÜ/10970-17/05160 was terminated, and a new Electric Power Generation Licence for 47 years

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

and 8 months was secured from the EMRA by the Project Company on 17 August 2023. The new licence is granted as a continuation of the previous one. As stated in the Electric Power Generation Licence, Pelit WPP was expected to be connected to Kangal WPP and Gürün WPP with 154 kV Energy Transmission Line (ETL). However, according to information obtained from the Project Company, the Project will be connected to the R-3 WPP which will be located in the northern side of the Project area, Kayalar village, Gürün district, Sivas province. Therefore, The Electric Power Generation Licence will be subjected to an amendment after Technical Interaction Analysis (TEA) approval, due to the change in the ETL connection and installed capacity. According to the information shared by the Project Company, the construction period of the Project will be 13 months as stated in the National Environmental Impact Assessment (EIA) Report. The construction of the Project will be initiated in the Q2 of 2024 with the construction of Project roads and is planned to be completed by the Q4 of 2024.

Following these changes, a design revision was considered for the Project in order to increase the efficiency. This revision covered change in the number of wind turbines from 20 to 14 turbines, with the cancellation of six turbines. The total installed power capacity of the Project once more remained same.

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 nine villages in Gürün of Sivas province. These are the six closest villages to the Project area and turbine locations including Çiçekyurt, Kürkçü, Davulhöyük, Koyunlu, Reşadiye, and Yılanhöyük; three closest villages to the planned access road including İncesu, Kaşkoy, and Kızılpınar. Additionally, there are two villages which are not expected to be affected by the Project due to distance however both are located in the nearby of the Project Licence area but away from the construction site including Böğrüdilik and Konakpınar. These villages identified in this Report can be updated based on the understanding of further potential impacts following additional site visit findings.

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

- Local community members whose livelihoods have the potential to be significantly and adversely affected due to land acquisition / use,
- Nearby villages and business enterprises located in the immediate vicinity of the Project area that are likely to be exposed to increased traffic volume, road safety risks, dust, and noise impacts,
- Local community members who are on the access roads to the Project area and/or use these roads, and are likely to be exposed to increased traffic volume and road safety risks,
- Local community members using the Project License area for agriculture and animal husbandry purposes and that may experience livelihood loss, increased traffic volume and road safety risks,
- Local community members who may benefit from the Project's local employment opportunities,
- Business enterprises that may benefit from the Project's local procurement activities,
- Vulnerable groups who may be in need for essential consultation in the Project, and
- All construction phase workers employed within the scope of the Project (including subcontractors).

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

- Neighbouring communities 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 Topic	Impact Description	Receptor	Phase of the Project	Mitigation Measures
Population	It is critical that the Project workers coming to the region from outside are oriented in accordance with the social codes of the neighbourhood and integrated into daily life.			<ul style="list-style-type: none"> <li>● Trainings and Code of Conduct for workers</li> <li>● SEP, continuous consultation, and engagement through the Community Liaison Officer (CLO)</li> <li>● Corporate Community grievance mechanism</li> </ul>
	Increased traffic volume during the construction phase throughout the access roads to the Project area may result in road traffic safety risks.	Local community members / Local communities / Project affected neighbourhoods	Construction	<ul style="list-style-type: none"> <li>● Corporate Community Health, Safety and Security Procedure</li> <li>● Traffic Management Plan</li> <li>● Road safety, traffic regulations and speed limit trainings for workers within and near the Project area</li> </ul>
	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"> <li>● Corporate Noise Management Plan (NMP)</li> <li>● SEP, continuous consultation, and engagement through the CLO</li> <li>● Corporate Community grievance mechanism</li> </ul>
Education	Increased traffic volume during the construction phase throughout the access roads to the Project area may result in road traffic safety risks.	Students / local community members / Project affected neighbourhoods	Construction	<ul style="list-style-type: none"> <li>● Traffic Management Plan</li> <li>● Awareness activities for children about road traffic safety</li> <li>● Road safety, traffic regulations and speed limit trainings for workers within and near the Project area</li> <li>● SEP, continuous consultation, and engagement through the CLO</li> <li>● Corporate Community grievance mechanism</li> </ul>
	Educational institutions take a significant place for the Project Company in terms of corporate social responsibility activities and collaboration (i.e., student visits to the Project, renovation of the schools). The Project may lead students to receive further opportunities in access to education.			<ul style="list-style-type: none"> <li>● Evaluating collaborative activities as corporate social responsibility strategy</li> <li>● SEP, continuous consultation, and engagement through the CLO</li> <li>● Corporate Community grievance mechanism</li> </ul>

Impact Topic	Impact Description	Receptor	Phase of the Project	Mitigation Measures
	During the operation phase, the turbines will produce noise from their mechanical and electrical components, as well as from the aerodynamic effects of the blades. Students whose schools and/or houses are close to the turbines may be affected from the noise during the operation phase.		Operation	<ul style="list-style-type: none"> <li>● Corporate Noise and Vibration Management Plan</li> <li>● SEP, continuous consultation, and engagement through the CLO</li> <li>● Corporate Community grievance mechanism</li> <li>● Corporate Operational maintenance procedures</li> </ul>
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 animal husbandry purposes. Therefore, local community members who lose their lands may be impacted economically since their livelihood activities become limited or totally lost. Within the Project license area, there are restrictions on carrying mining activities and establishing licensed energy production facilities. Apart from this, there are no restrictions on constructing any other infrastructure or superstructure elements.	Local community members whose lands are acquired-expropriated	Construction	<ul style="list-style-type: none"> <li>● SEP, continuous consultation, and engagement through the CLO</li> <li>● Corporate Community grievance mechanism</li> <li>● Human Rights Impact Assessment (HRIA)</li> <li>● Social Responsibility and Community Development Plan</li> </ul>
	The local community members that are impacted by the land acquisition and expropriation may have residual impacts stemming from incomplete processes. If there are people who are physically or economically displaced after construction, the follow-up of these people will continue during the operation phase. Physical displacement is not expected within the scope of the Project.		Operation	<ul style="list-style-type: none"> <li>● Livelihood Restoration Plan (LRP)</li> </ul>
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"> <li>● SEP, continuous consultation, and engagement through the CLO</li> <li>● Corporate Community grievance mechanism</li> <li>● LRP</li> <li>● Human Rights Impact Assessment (HRIA)</li> <li>● Social Responsibility and Community Development Plan</li> <li>● Corporate Air Quality Management Plan</li> </ul>

Impact Topic	Impact Description	Receptor	Phase of the Project	Mitigation Measures
	<p>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.</p> <p>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.</p>	<p>Local community members / Local communities / Project affected neighbourhoods</p> <p>Local community members / Local businesses, enterprises, and suppliers</p>		<ul style="list-style-type: none"> <li>Local employment and procurement strategy</li> <li>SEP, continuous consultation, and engagement through the CLO</li> <li>Social Responsibility and Community Development Plan</li> <li>Corporate Community grievance mechanism</li> <li>Human Rights Impact Assessment (HRIA)</li> </ul>
	<p>There are pasture lands where the Project is located. Main concerns reported by the consulted local community members were about the loss of income for the households whose livelihood is based on animal husbandry</p>	<p>Local community members whose livelihoods are based on animal husbandry</p>	Operation	<ul style="list-style-type: none"> <li>SEP, continuous consultation, and engagement through the CLOs</li> <li>LRP</li> <li>Corporate Community grievance mechanism</li> <li>The turbine areas will not be fenced, which will enable the herds to be grazed.</li> </ul>
Infrastructural Services	<p>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.</p>	<p>Local community members / Project affected neighbourhoods</p>	Construction	<ul style="list-style-type: none"> <li>SEP, continuous consultation, and engagement through the CLO</li> <li>Traffic Management Plan</li> <li>Corporate Community grievance mechanism</li> <li>Correspondence with governmental institutions when necessary (i.e., for water, road, transportation issues)</li> <li>Community Health, Safety and Security Procedure</li> </ul>
Gender	<p>The Project may improve the gender equality through local employment of both women and men residing in the Project affected neighbourhoods. Throughout the construction activities, gender-based violence and harassment (GBVH) cases may occur unless preventive measures are taken.</p>	<p>Local community members</p>	Construction	<ul style="list-style-type: none"> <li>Trainings and Code of Conduct for workers</li> <li>Awareness raising activities for the Project affected neighbourhoods</li> <li>Specific meetings with women in the Project affected neighbourhoods</li> <li>SEP, continuous consultation, and engagement through the CLO</li> <li>Corporate Community grievance mechanism</li> <li>Community Health, Safety and Security Procedure</li> <li>Company GBVH Policy</li> </ul>

Impact Topic	Impact Description	Receptor	Phase of the Project	Mitigation Measures
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"> <li>● Trainings and Code of Conduct for workers</li> <li>● SEP, continuous consultation, and engagement through the CLO</li> <li>● Corporate Community grievance mechanism</li> <li>● Human Rights Impact Assessment (HRIA)</li> <li>● Community Health, Safety and Security Procedure</li> </ul>

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 may 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, Health and Safety (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 December 2017. 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 Environmental, Health and Safety (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 website<sup>2</sup>: 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.

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<sup>2</sup> <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 3.2, 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 their level of interest in the Project as measured by an assessment of the magnitude of stakeholder influence and impact on the Project. In line with each stakeholder’s level of interest, disclosure and consultation activities are determined based on certain frequencies for construction and operation phases of the Project. Disclosure and consultation activities to be implemented throughout the lifetime of the Project is outlined in Table 5.1 together with the proposed implementation timetable.

**Table 3.1: External Stakeholder List for Governmental Authorities**

#### GOVERNMENTAL BODIES

Level	Organization	Relation to the Project	Level of Interest
	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
National	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)		Medium
	MoAF, General Directorate of Food and Control		
	MoAF, General Directorate of Livestock	MoAF may have specific views about the design, construction, and operation activities of the Project.	
	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		High
	MoAF, General Directorate of Water Management		
	Ministry of Environment, Urbanization and Climate Change (MoEUCC)	MoEUCC has regulatory functions in relation to the Project such as environmental impact assessment permits and environmental permitting.	Medium
	MoEUCC, General Directorate of EIA, Permit and Audit		
	MoEUCC, General Directorate of Environmental Management		
	MoEUCC, General Directorate of Infrastructure and Urban Transformation		
	MoEUCC, General Directorate of Spatial Planning		
	MoEUCC, General Directorate of Protection of Natural Assets		
	Ministry of Transport and Infrastructure (MoTI)	MoTI may have specific views regarding evaluation of the Project.	Medium
	MoTI General Directorate of Infrastructure Investments		
	MoTI General Directorate of Highways		
	Ministry of Labour and Social Security (MoLSS)	MoLSS may have specific views on labour and working conditions, and health and safety of the Project personnel.	Low
	MoLSS, General Directorate of Labor		
	MoLSS, General Directorate of Occupational Health and Safety		
	Ministry of Culture and Tourism (MoCT)	MoCT may have views in terms of legislation.	Low
	MoCT General Directorate of Cultural Heritage and Museums		
	19 <sup>th</sup> Regional Directorate of DSI (State Hydraulic Works)	This organization may have specific views about water courses running close to the Project area.	Low
	15 <sup>th</sup> Regional Directorate of Ministry of Agriculture and Forestry	This organization may have specific views on the potential protected areas close to the Project area and the status of the trees in the Project area.	High
<b>Regional</b>	16 <sup>th</sup> Regional Directorate of Highways	The organization may provide opinion regarding road crossing within the Project area.	High
	Sivas Regional Directorate for the Conservation of Cultural Property	This organization is an important stakeholder to identify and clarify the archaeological potential of the Project area.	High
	The Governorship of Sivas	The governorships representing the national government are the highest authorities in the provinces.	High
<b>Provincial and District</b>	Sivas 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
	Sivas Municipality	The municipality and its relevant departments will have responsibilities in relation to the Project.	High
	Sivas Municipality, Directorate of Planning and Project		



**GOVERNMENTAL BODIES**

Level	Organization	Relation to the Project	Level of Interest
	Sivas Municipality, Directorate of Zoning and City Planning		High
	Sivas Municipality, Climate Change and Zero Waste		
	Sivas Municipality, Directorate of Civil Works		
	Sivas Municipality, Directorate of Transportation		
	Sivas 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
	Sivas 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
	Sivas 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
	Sivas Provincial Directorate of Agriculture and Forestry	This organization may provide provincial-specific and/or site-specific views on the Project.	High
	Sivas Provincial Command of Gendarmerie	This organization may provide provincial-specific and/or site-specific views on the Project.	Medium
	Sivas Water and Sewer Administration	This organization may provide an opinion related to water/wastewater infrastructure of the Project area.	Medium
	The District Governorship of Gürün	The Project area is located in Gürün district and the local governorship, the central municipality, and their related departments are stakeholders regarding obtaining relevant permits, approvals during planning, and construction and operation phases of the Project.	High
	The Municipality of Gürün		
	Directorate of Civil and Construction Works		
	Directorate of Water Works		Medium
	Directorate of Municipal Police		Medium
	Gürün District Directorate of Health		High
	Gürün District Gendarmerie Command		
	Gürün District Directorate of Agriculture and Forestry		

**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)		
Sivas Province Bee Breeders Association			

**NON-GOVERNMENTAL BODIES**

Level	Organization	Relation to the Project	Level of Interest
	Sivas Association of Animal Protection		High
	Sivas Association of Woman Farmers		
	Sivas Association of Sustainable Development and Migration Prevention		
	Sivas Association of Producer Women Entrepreneurs Solidarity		
	Sivas Urban Women's Association		
	Sivas Disabled People's Association		
	Sivas Chamber of Merchants and Craftsmen		
	Sivas Chamber of Commerce and Industry		
	Sivas Chamber of Agriculture		
	Gürün Chamber of Merchants and Craftsmen		
	Gürün Chamber of Commerce and Industry		
	Gürün Chamber of Agriculture		
	Gürün Association of Environmental Forestation		

**Table 3.3: Other External Stakeholder Groups**

**STAKEHOLDER GROUPS**

Level	Group	Relation to the Project	Level of Interest
<b>Mukhtars/Residents/Local Communities</b>	<p>The mukhtars and residents at the nine Project affected villages and additional two villages which are located in the nearby of the Project Licence area (Çiçekyurt, Kürkçü, Davulhöyük, Koyunlu, Reşadiye, Yılanhöyük, İncesu, Kaşkøy, Kızılpınar, Böğürdelik and Konakpınar)</p> <p>Local businesses and enterprises (Local shops, beekeepers, income-generating agricultural lands)</p> <p>Local communities including PAPs subject to direct land acquisition</p>	Neighbourhoods are key stakeholders considering potential impacts of the Project.	High
<b>Vulnerable/ Disadvantaged Groups</b>	<p>Women</p> <p>The landless/homeless people</p> <p>The elderly</p> <p>Students</p> <p>People with disabilities</p> <p>Unemployed people</p> <p>Syrians under temporary protection (SuTP)</p> <p>Refugees under international protection (UIP)</p>	Vulnerable groups are key stakeholders considering potential impacts of the Project.	High
<b>Media</b>	<p>Local, regional, and social media (including but not limited to the following newspapers, TV stations, social media channels):</p> <ul style="list-style-type: none"> <li>Sivas İrade Newspaper</li> <li>Sivas Ekspres Newspaper</li> <li>Memleket Sivas Newspaper</li> <li>Sivas Egemen Newspaper</li> <li>Sivas Postası</li> <li>Channel 58</li> <li>Sivas SRT</li> <li>Vizyon 58</li> </ul>	It is important to engage with local and regional media organizations for effective public disclosure and consultation.	Medium



**STAKEHOLDER GROUPS**

Level	Group	Relation to the Project	Level of Interest
<b>Universities</b>	Sivas Cumhuriyet University	Universities are one of the key stakeholders when research needs to be conducted within the scope of the Project.	Medium
	Sivas University of Science and Technology		
<b>Other potentially affected local social institutes</b>	Local schools	It is essential to ensure that the social environments that pose a significant place for community health, safety and security issues (i.e., hospitals, fire stations) and/or where key stakeholders utilize/ spend their time are operating properly at every stage of the Project.	Medium
	Mosques		
	Local coffeeshops		
	Gürün State Hospital		
	Gürün District Fire Station		

**Table 3.4: Internal Stakeholder List**

**INTERNAL STAKEHOLDERS**

Level	Organization	Relation to the Project	Level of Interest
<b>Internal Stakeholders</b>	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 Mining Affairs
- Ministry of Environment, Urbanization, and Climate Change (formerly known as Ministry of Environment and Urbanization)
  - General Directorate of Environmental Impact Assessment, Permitting and Inspection
  - General Directorate of Spatial Planning
- Ministry of Agriculture and Forestry (formerly known as Ministry of Forestry and Water Affairs)
  - General Directorate of Nature Conservation and National Parks
  - General Directorate of State Hydraulic Works
  - General Directorate of Forestry
- Ministry of Culture and Tourism
  - Sivas Cultural Heritage Preservation Regional Board Directorate
- Sivas Governorship
  - Provincial Directorate of Environment, Urbanization and Climate Change
  - Provincial Disaster and Emergency Directorate
  - Provincial Directorate of Food, Agriculture and Forestry
- Gürün Municipality
  - Department of Water and Sewerage
- Sivas City Administration
  - Directorate of Zoning and Urban Development

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

opinions of the official authorities and related actions to be taken by the Project Company will be further assessed during the ESIA studies to be performed by the Consultant.

In this context, a public participation meeting was carried within the scope of the National EIA Studies by the Sivas Provincial Directorate of Environment and Urban Planning in Çiçekyurt village, Gürün, Sivas, on 5 December 2017. This meeting aimed to engage with the public, provide information about the Project, and gather their feedback regarding the Project. The meeting details were announced through local (*Sivas Memleketi*) and national (*Posta*) newspapers and notices were sent to the villages. During the meeting, informational brochures detailing the Project, its potential environmental impacts, and proposed measures were distributed to the local communities. At the meeting, the local communities raised specific questions regarding employment opportunities, electromagnetic effects, expropriation, and the planned commencement date of the Project. The discussions held during these meetings were documented in final National EIA report.

The minutes of the public participation meeting were shared with the Consultant by the Project Company. Accordingly, stakeholders asked questions about the following issues:

- The commencement date of the Project,
- Employment opportunities within the scope of the Project,
- Benefits of the Project to the Project affected villages and their residents,
- Land acquisition and expropriation processes within the scope of the Project,
- Possibility of utilization of generated electricity by the Project affected villages and their residents,
- Whether the pasturelands within the Project Licence Area can be used or not when the Project starts,
- The payment to be made for the pasturelands,
- Magnetic impact of the Project on people and animals, and
- Noise impact of the Project on animals.

Additionally, stakeholder engagement activities were also performed within the scope of Environmental and Social Due Diligence (ESDD) process of the Project conducted by Project Company's external ESDD Consultant in December 2023. During stakeholder activities, six mukhtars from neighbouring settlements (Çiçekyurt, Davulhöyük, Reşadiye, Yılanhöyük, Kürkçü, and Koyunlu) were interviewed. It was stated in the Final ESDD Report that the mukhtars had limited knowledge about the Project. Their main concern was related to the traffic impacts of the Project due to the inadequate road infrastructure. In line with this concern, their request was about village road improvements within the scope of the Project. Other than that, the expectation regarding the local employment opportunities was noted by the external consultants of the Project Company. Consulted mukhtars added that there was no negative approach by the residents towards the Project. Also, the representatives of Kangal WPP, which is located near the Project area, were consulted during the ESDD studies. As reported by Kangal WPP representatives, there is an ongoing capacity extension project within their operation area. In this regard, they had concerns about the construction timeline of the Project and requested to receive the timeline. Kangal WPP representatives had a positive approach towards working in collaboration with the Project Company representatives to mitigate the risks related to construction timeline and workload.

### **4.3 Stakeholder Engagement Activities during ESIA (January 2024)**

The Consultant conducted a site visit on 22-23 January 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 villages, understanding the Project-related concerns and expectations of

the local community members, reflecting the views of key stakeholders, and identifying vulnerable groups. In line with these aims, 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:

- Gürün District Directorate of Agriculture and Forestry
- Mukhtar and residents of Çiçekyurt village
- Mukhtar and residents of Koyunlu village
- Mukhtar of Kürkçü village
- Mukhtar of Reşadiye village
- Mukhtar of Yılanhöyük village

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 2017.
- Consulted residents of Çiçekyurt village had some concerns about the Project's potential adverse impacts, which particularly include damage to the existing roads and water supply network.
- As reported by the Gürün District Director of Agriculture and Forestry, the pasturelands in the Project affected villages are plentiful and no difficulties about the restriction and/or limitation regarding the pasturelands deriving from the Project's land acquisition activities are foreseen.

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

- Improving the road quality throughout the access routes between the district centre and the Project affected villages.
- Constructing a mutual road for the utilization of residents in the Project affected villages (particularly Çiçekyurt, Kürkçü, and Koyunlu). As reported by the mukhtars, access roads to the villages are closed in winter due to bad weather conditions. When they request for the governmental roadside assistance, a prioritization is made based on the population. However, since the populations in the majority of the Project affected villages are low in winter, they fall behind in this prioritization. Therefore, if the Project Company could provide support in construction of a mutual road that will be commonly used by the residents of the Project affected villages, they could receive easier assistance in winter. Additionally, accessing to the Gürün district centre from some villages (namely Kürkçü and Koyunlu) takes quite a long time and distance due to the inefficiency of the existing road. By constructing the mutual road as per the route suggested by the mukhtars, both the time and distance could be lowered.
- Improving the water supply network quality in Çiçekyurt village since it may be affected by the Project's construction activities.
- Providing barley, wheat and apricot seedling support in Gürün district.
- Providing vaccination support against common tree and animal diseases in Gürün district.
- Providing support for the beekeepers in Gürün district through hive supply, quality check, and reclamation studies.
- Creating local employment opportunities for the youth and unemployed in the nearby villages (particularly Çiçekyurt, Yılanhöyük and Koyunlu).

- Providing support to construct or improve the drinking water depot/tank, school, and social facility for weddings and funerals in the nearby villages.

This Section will be updated based on the findings of external stakeholder interviews to be held during the additional field visit.

#### **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.

Resettlement specific disclosure and consultation steps are given in LRP. During the resettlement specific disclosure and consultation meetings, Project-specific LRP will be disclosed to the PAPs directly affected by the Project.

The documents in the disclosure package will be revised and finalized in line with the feedback from the Project stakeholders. Finalized disclosure package will also be published on the Project Company's website.

# 5 Stakeholder Engagement Programme and Disclosure Process

## 5.1 Overview

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

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

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

## 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 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
<b>Local Communities</b>					
1	Residents in the Project Affected Settlements (Çiçekyurt, Kürkçü, Davulhöyük, Koyunlu, Reşadiye, Yılanhöyük, İncesu, Kaşköy, Kızılpınar, Böğrüdelik and Konakpınar)	<ul style="list-style-type: none"> <li>● 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</li> <li>● Outline the mitigation measures identified in the ESIA report</li> <li>● Inform about the local employment and procurement</li> <li>● Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>● Face-to-face consultation meetings</li> <li>● Regular visits</li> <li>● Disclosure of ESIA report together with its NTS, SEP, PID/brochure and other Project related documents</li> <li>● Disclosure of the Project-specific LRP to the PAPs directly affected by the Project</li> <li>● Website announcements</li> <li>● Social media announcements</li> <li>● Announcements through posters/ billboards/ press release</li> </ul>	<ul style="list-style-type: none"> <li>● At least quarterly (and when needed) during construction</li> <li>● Quarterly during operation</li> </ul>	<ul style="list-style-type: none"> <li>● CLO</li> <li>● Project Company</li> </ul>
	Local communities using the License Area for agricultural and animal husbandry purposes				
	Local Businesses and Enterprises				
2	Mukhtars of the Project Affected Settlements (Çiçekyurt, Kürkçü, Davulhöyük, Koyunlu, Reşadiye, Yılanhöyük, İncesu, Kaşköy, Kızılpınar, Böğrüdelik and Konakpınar)	<ul style="list-style-type: none"> <li>● 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</li> <li>● Outline the mitigation measures identified in the ESIA report</li> <li>● Inform about the local employment and procurement</li> <li>● Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>● Face-to-face consultation meetings</li> <li>● Regular visits</li> <li>● Disclosure of ESIA report together with its NTS, SEP, PID/brochure and other Project related documents</li> <li>● Disclosure of the Project-specific LRP to the PAPs directly affected by the Project</li> <li>● Website announcements</li> <li>● Social media announcements</li> <li>● Announcements through posters/ billboards/ press release</li> </ul>	<ul style="list-style-type: none"> <li>● At least quarterly (and when needed) during construction</li> <li>● Quarterly during operation</li> </ul>	<ul style="list-style-type: none"> <li>● CLO</li> <li>● Project Company</li> </ul>

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"> <li>● 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</li> <li>● Specific interest to receive their grievances (if there are any) since they may not be able to use the grievance channels</li> <li>● Outline the mitigation measures identified in the ESIA report</li> <li>● Inform about the local employment and procurement</li> <li>● Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>● Face-to-face consultation meetings</li> <li>● Regular visits</li> <li>● Disclosure of ESIA report together with its NTS, SEP, PID/brochure and other Project related documents</li> <li>● Disclosure of the Project-specific LRP to the PAPs directly affected by the Project</li> <li>● Website announcements</li> <li>● Social media announcements</li> <li>● Announcements through posters/ billboards/ press release</li> <li>● Specific meetings held with women groups and other particular vulnerable groups</li> </ul>	<ul style="list-style-type: none"> <li>● Quarterly during construction</li> <li>● Semi-annually during operation</li> </ul>	<ul style="list-style-type: none"> <li>● CLO</li> <li>● Project Company</li> </ul>
4	Other potentially affected local social institutes (Schools, mosques, local coffeeshops)	<ul style="list-style-type: none"> <li>● 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</li> <li>● Outline the mitigation measures identified in the ESIA report</li> <li>● Inform about the local employment and procurement</li> <li>● Inform about the Community Level Assistance Program</li> <li>● Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>● Face-to-face consultation meetings</li> <li>● Regular visits</li> <li>● Disclosure of ESIA report together with its NTS, SEP, PID/brochure and other Project related documents</li> <li>● Website announcements</li> <li>● Social media announcements</li> <li>● Announcements through posters/ billboards/ press release</li> <li>● Specific meetings held with children (student) groups</li> </ul>	<ul style="list-style-type: none"> <li>● Quarterly (and when needed) during construction</li> <li>● Quarterly during operation</li> <li>● 3 days prior to risky construction activity</li> </ul>	<ul style="list-style-type: none"> <li>● CLO</li> <li>● Project Company</li> </ul>

**Governmental Bodies**



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

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

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible
<b>Internal Stakeholders</b>					
<b>11</b>	Project Employees		<ul style="list-style-type: none"> <li>● Trainings</li> <li>● Face-to-face consultation meetings</li> </ul>		
	Contractors and subcontractors and their employees	<ul style="list-style-type: none"> <li>● 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</li> <li>● Disclose the grievance mechanism of the Project</li> </ul>	<ul style="list-style-type: none"> <li>● Disclosure of ESIA report together with its NTS, SEP, PID/brochure and other Project related documents</li> <li>● Announcements through posters/ billboards/ press release</li> </ul>	<ul style="list-style-type: none"> <li>● Quarterly during construction</li> <li>● When needed during operation</li> </ul>	<ul style="list-style-type: none"> <li>● Project Company and relevant departments (i.e., Human Resources Department)</li> </ul>
	Suppliers and their workers		<ul style="list-style-type: none"> <li>● Announcements on the Project area</li> </ul>		

## 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 6.30 and 6.40 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:

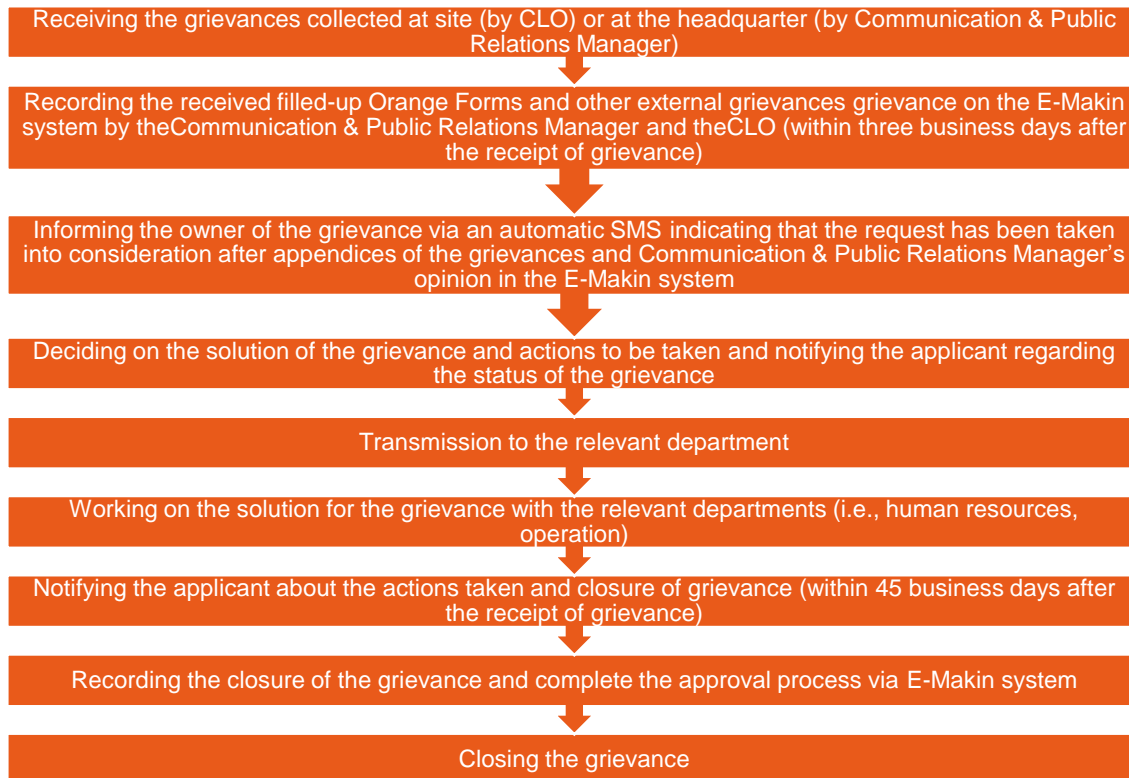
- There will be a formalized and written Project Grievance Mechanism Procedure that involves the principles of the mechanism (including anonymity), available channels with contact details of the CLO, defined timeframes for acknowledgement of the receipt of complaints and subsequent resolution, sample 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 and/or online messages (i.e., via WhatsApp) 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**

Should the Company be unable to resolve a complaint, or if the stakeholder is not satisfied with the outcome, the Company may consider seeking advice from other independent parties (i.e., local legal institutions and/or well-regarded NGOs) for further investigation, root cause analysis or actions in line with the good international practices on grievance management. Applicants always have the right to appeal to local or relevant legal authorities for a solution with which they are not satisfied.

Sample grievance log to be utilized by the Project Company throughout the Project is provided in Appendices Section 9.39.

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.
- All grievances will be reviewed to be classified whether they are genuine and related to the Project activities or not. If the issues/disputes raised are not related to the Project activities, kind guidance is provided to the applicant to contact relevant party.

- For eligible grievances, CLOs will assign actions to the relevant Project Company staff (depending on the subject of the grievance) for their assessment and clarification of the grievance resolution actions.
- Within a maximum of seven business days, CLOs will inform the applicant on resolution actions taken/to be taken. If the case requires a more complex investigation, this is also conveyed to the applicant. It is ensured that applicant is provided with updated information at each step of the process until the clarification of resolution actions.
- In general, grievances are estimated to be resolved and closed within 45 business days after the receipt. However, 30 business 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 (i.e., the applicant's physical unavailability at the location of the grievance, inconvenient land/seasonal conditions, need for third-party assessments, arrangement of schedule for maintenance/repair works). Accordingly, the Project Company will make a prioritization among the grievances by considering their nature, subject matters, and scope. The resolution period for the grievances with high priority will be revised as seven 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 Human Resources Department will be the main implementation body for the internal grievance mechanism of the Project.

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

- Grievances will be classified and prioritized depending on their subjects while registering to the grievance log. Accordingly, resolution period for the grievances with high priority is recommended to be seven days after the receipt of the grievance. For the grievances with medium priority, it is 15 days and the grievances that are prioritized as low can be resolved within 30 days.
- After the grievances are successfully closed and the corrective actions are taken, the results of the grievances including anonymous grievances will be displayed on the notice boards within the Project site.

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

## 6.5 Grievance Mechanism Channels and CLO Contact Details

The channels listed below can be used for receiving grievances.

### 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 **[TBD]**
  - Website: <https://www.beesoru.com/>
- Phone number of the Head Office: (0212) 340 27 60- 286 39 85
- The Project specific e-mail address: **[TBD]**
- Grievance boxes located at the popular locations (i.e., teahouses and/or mukhtars' offices) in the Project affected villages

### Contact Details of the CLO

Community Liaison Officer (Site): Ahmet Eğit (Construction)

### Ethical Violation Declaration Channels

- E-mail address: [orangeethics@borusan.com](mailto:orangeethics@borusan.com)
- Website: [www.orangeethics.com](http://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
- Awareness raising campaigns among the Project workforce on the stakeholder engagement and grievance mechanism principles
- Responsibility for the preparation of the Project-specific grievance and consultation logs to be used during internal/external reporting
- Responsibility for the preparation of the Project-specific stakeholder engagement and consultation reports to be shared internally and with the Lenders
- Informing the relevant managers of the Project Company for development and implementation of additional measures when necessary, in order to resolve community-related issues, including measures aimed at resolving non-closed grievances
- Coordinating with parties for proper implementation of the SEP

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

### **Project Manager**

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

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

The 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
- Regular E&S performance reports (i.e., covering a wider range of E&S issues) for dissemination among local stakeholders

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

## 9 Appendices

### 9.1 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 [Placeholder: Project Company to provide Project Grievance Register Form if there is any]**

<b>A. General Information</b>	
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>B. Means of Receiving Grievance</b>	
<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 .....
<b>C.1. Information about the Applicant (Please do not fill for anonymous applications)</b>	
Name	
Gender	
Contact Information	Phone number: E-mail address:
Address	
Neighborhood/ District/ Province	
<b>C.2. Stakeholder Category</b>	
<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 .....	
<b>D.1. Information about Grievance</b>	
<b>D.2. Grievance Category</b>	
<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 .....	
<b>E. Actions Recommended</b>	

### 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									

