

Mersinli Wind Power Plant Project

Stakeholder Engagement Plan (SEP)

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Quality information

Prepared by

AECOM Turkey
Mustafa İşlek (Senior Sociologist)

Checked by

Burcu Yazgan Kayabali,
ESIA and ESDD Section Manager

Approved by

Dr. Hande Yukseler
Environment End Market (EM)
Director Turkey

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Prepared for:

Mersinli Wind Power Plant Project

Prepared by:

Aecom Turkey Danışmanlık ve Mühendislik Ltd. Şti
Mustafa Kemal Mahallesi Dumlupınar Bulvarı Tepe Prime
No:266 B Blok
No:50-51 06800
Çankaya
Ankara
Turkey

T: +90 312 4429863
aecom.com

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1. Introduction

This Stakeholder Engagement Plan (SEP) has been prepared for the Mersinli Wind Power Plant Project ("Mersinli WPP Project", "the Project"), which is planned to be constructed and operated in İzmir province, within the administrative borders of Kemalpaşa, Torbalı and Bayındır districts. Alcazar Energy will implement the Project through the Special Purpose Vehicle (SPV), namely Yander Elektrik Muh. Mus. Ins. Tur. ve Tic. A.Ş. ("Yander Elektrik" or "SPV") hereafter referred to as the Project Company, which was established by the previous Project Owner at the national tender stage conducted for the wind power projects in 2007. Alcazar Energy is a company established to focus on renewable energy generation in Middle East, Turkey and Africa region by developing, structuring, acquisition and operation of on-shore wind energy and photovoltaic solar energy plants in emerging economy countries. Alcazar Energy acquired 100% of the shares of the Project Company established for Mersinli WPP (Yander Elektrik) in May 2017.

The Mersinli WPP Project will consist of a total of 17 wind turbines each with 3.45 MW capacity, making up a total installed capacity of 58.7 MWm/55 MWe. A map showing the Project Layout is presented in Figure 1-1. The construction phase of the Project, including earthworks, construction of access roads, preparation of crane pads, turbine foundations, erection of turbines, installation of underground cables, construction of substation and ensuring Energy Transmission Line (ETL) connection is planned to be completed in about 16 months. This will also include commissioning of the power plant. The Project schedule for the construction phase is provided in Figure 1-2.

The Energy Generation License ("License") for the Project was obtained from the Energy Market Regulatory Authority (EMRA) on behalf of Yander Elektrik on 5 July 2012 (licensing date). In accordance with the License, the Project is licensed to generate electricity for 49 years starting from the licensing date.

An Environmental Impact Assessment (EIA) process, in line with the national EIA Regulation was conducted for the Project. The Project obtained an "EIA Positive Certificate", with decision number 4234 on 18 July 2016 from the Ministry of Environment and Urbanisation ("MoEU" or the "Ministry"). On 1 November 2017, the Ministry confirmed the validity of the existing "EIA Positive Certificate" for the current Project design¹.

In line with its Environmental and Social Sustainability Policy, the Project Company is committed to communicating openly and actively with workers, communities and governmental/non-governmental organisations on all topics in all Project related activities. This SEP has been designed to meet the Project Company's corporate policies and standards. The SEP will also guide the Project Company towards implementing a structured stakeholder consultation and engagement process during the period of the ESIA studies, as well as during the further stages of the Project implementation. This includes; planning, construction, operation and decommissioning of the Mersinli WPP.

In the preparation of this Plan, it has been considered that stakeholder engagement is the basis to building strong, constructive and responsive relationships which are essential for the successful management of a project's environmental and social impacts. Having been prepared as a part of the ESIA process, the SEP aims at initiating the engagement process in the early phases of the Project to ensure timely public access to all relevant information and that stakeholders are provided with an opportunity to input into the project design and the assessment of impacts.

¹ The national EIA process (limited EIA according to the Turkish EIA Regulation) was initially started by the former Project Owner and an "EIA not Required Decision" was obtained from the Ministry of Environment and Urbanization (Provincial Directorate) in 2012 based on the original Project design. Due to the changes made in the Project design after the issuance of the "EIA not Required Decision" the former Project owner initiated another EIA process (full EIA according to the Turkish EIA Regulation) and obtained the existing "EIA Positive Decision" for the Project in 2016. A lawsuit was later filed against the Ministry for its EIA Positive Decision issued for the Project, requesting the cancellation of the EIA Positive Decision. After the appeal processes, a final decision was issued by the court in January 2018, rejecting the appeal request of the plaintiffs and closing the court case against the EIA Positive Decision issued for the Project.

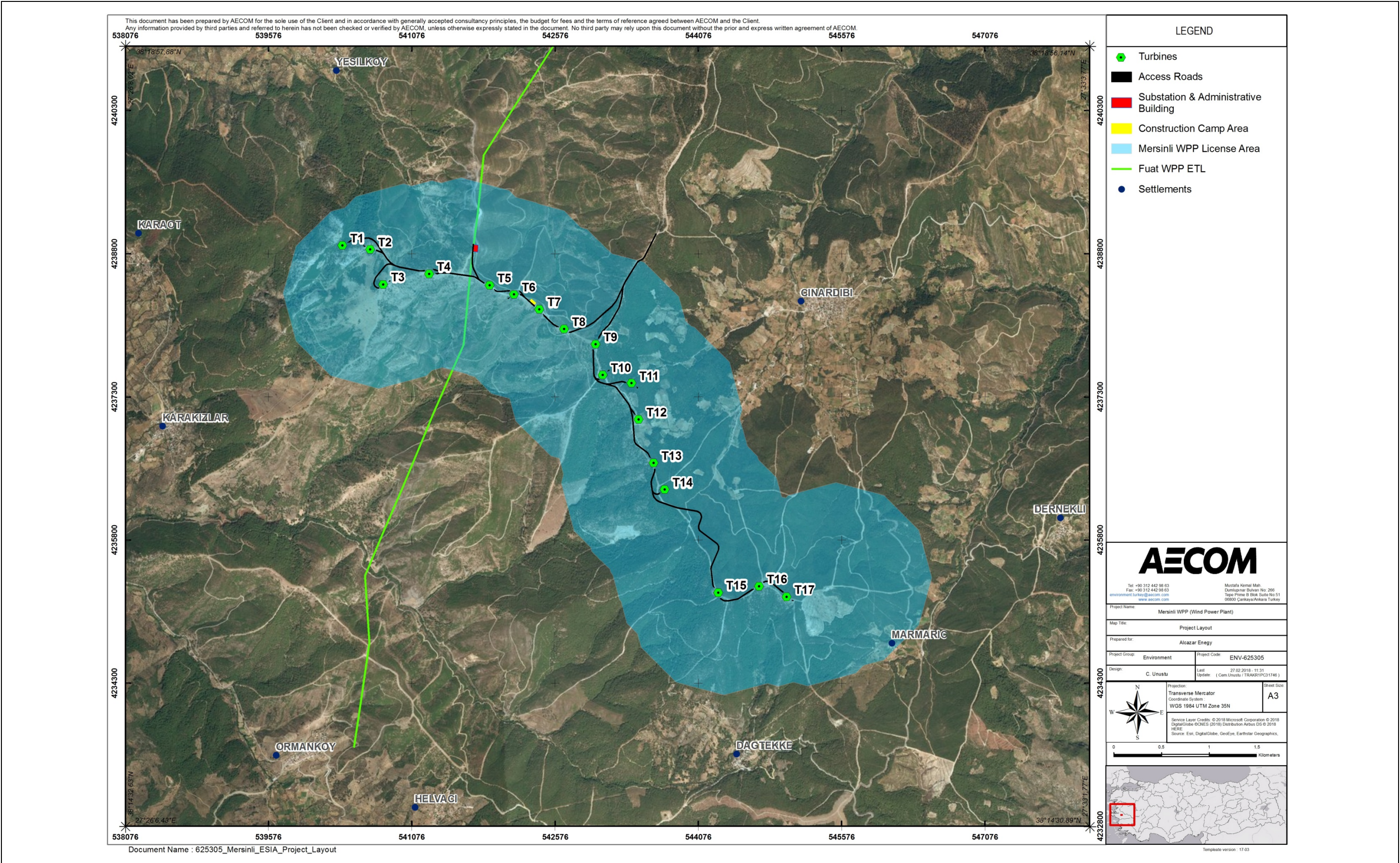


Figure 1-1. Project Layout

Tasks	Months															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1. Transport																
1.1 Foundations																
1.2. Nacelles and Hubs																
1.3. Blades																
1.4. Towers																
1.5. Substation Equipment																
2. Construction																
2.1. Mobilization																
2.2. Access roads and crane pads																
2.3. WTG Foundations																
2.4. Substation civil works																
3. Electrical Works																
3.1. Trenches and Cabling																
3.2. Substation																
3.4. ETL																
4. Turbine Installation																
5. Start-up																
5.1. WTGs Commissioning																
5.3. Plant Testing and Commissioning																

Figure 1-2. Project Schedule

In addition to identification of Project's stakeholders, this SEP provides a framework for the consultation and engagement activities, the disclosure plan and the grievance mechanism. This helps affected stakeholders to raise their concerns about the Project, as well as providing feedback about the Project Company's activities. The SEP also outlines the resources and responsibilities for the implementation and the means of monitoring and reporting on consultation and disclosure activities.

This SEP has been developed in accordance with the following international requirements and standards:

- The European Bank for Reconstruction and Development (EBRD) Performance Requirement 10 (PR10) on Information Disclosure and Stakeholder Engagement;
- IFC Performance Standard 1 (PS1) on Assessment and Management of Environmental and Social Risks and Impacts and the corresponding Guidance Note;
- Equator Principles III, Principle 5 on Stakeholder Engagement, Principle 6 on Grievance Mechanism and Principle 10 on Reporting and Transparency.

This SEP is a living document and will be regularly monitored, reviewed and updated by the Project Company throughout all stages of Project implementation. The Project Company will commission a competent team for the implementation of the SEP activities. In this regard, a Community Liaison Officer (CLO) was appointed by the Project Company in November 2017.

1.1 Project Background

Mersinli WPP Project is located within the administrative borders of Kemalpaşa, Torbalı and Bayındır districts of İzmir province, within the localities of Çardaklı Tepe, Kartal Tepe, Mersinli (Marmariç), Karlık Tepe and Akçam Tepe. The Project's License Area covers 1,650 ha and it is situated at approximately 35 km (air distance) southeast of İzmir city centre.

There are a number of settlements situated in the surroundings of the License Area. The closest settlement to the turbine locations is the Mersinli locality of the Dernekli neighbourhood, which is located approximately 1 km south-east of the closest turbine (Turbine-17). Mersinli was a hamlet of Dernekli neighbourhood, which was abandoned more than 20 years ago. The area has been resided by Marmariç Permaculture Community, whose first members have moved to the area in 2003 and established a Permaculture Village, which is referred to as "Marmariç Permaculture Village" within this Stakeholder Engagement Plan. Currently, there are 8 houses located in the village.

Other settlements in the vicinity of the License Area include; Dağtekke, Yeşilköy, Çınardibi, Cumalı, Karaot, Karakızlar, Dernekli, Gökyaka and Dereköy neighbourhoods.

The Project consists of land preparation, construction, operation and maintenance, and closure phases. The main associated facilities of the Project and their functions are provided below:

- 17 horizontal axis wind turbines, which will provide a total installed capacity of 58.7 MWm/55 MWe and generate around 180 GWh net electricity annually;
- Underground cable network that will transmit the generated electricity to the substation;
- Substation that will adjust the voltage of the generated electricity for transmission to the grid;
- Access Roads that will provide access to the site and between the Project units;
- Administrative Building that will house the control room, in addition to administrative and social facilities;
- Temporary facilities and sites that will be used during the construction phase. These include; mobilisation sites, contractor offices and compound areas, open stock area, top soil storage area, hazardous and non-hazardous waste storage areas, etc.

The grid connection of the Mersinli WPP will be provided through a 40-200 m line that will connect directly to the existing 154 kV Energy Transmission Line (ETL), passing through the Project Area (1 new ETL pylon will be required to be newly constructed). The Mersinli WPP Project does not include construction and operation of a new ETL line.

Other existing WPP projects located in the surroundings of the Mersinli WPP License Area includes:

- The Fuat WPP (33 MW; 10 turbines) that has operated in the north/north-east side of the License Area since 2015. It is the closest project to Mersinli WPP. The closest distance between the turbines of the Mersinli WPP and Fuat WPP is approximately 3.5 km (air distance). The 154 kV ETL of the Fuat WPP crosses the Mersinli WPP License Area between Turbine-4 and Turbine-5.
- Karabel WPP (3 MW; 1 turbine), which has been in operation since 2016, is located around 7.5 km northwest (air distance) from Mersinli WPP.
- Ege WPP (9.2 MW; 4 turbines), which has been in operation since 2015, is located around 20 km north-east (air distance) from the Mersinli WPP Project.

Besides as already stated above, other WPP projects concentrated in the Karaburun and Çeşme peninsulas, which are important touristic area in İzmir province, are located approximately at 80-100 km (air distance) in the west/north-west of the Mersinli WPP License Area. No other industrial facilities are located in the close vicinity of the License Area.

The main access to the Mersinli WPP site will be provided by Fuat WPP's existing stabilised access road. Site access roads to be built will include the internal roads that will provide access among turbine locations and the substation site. According to the current design, internal site access roads will have a total length of around 11.7 km, which will mainly follow the existing forest roads and fire breakers where possible. Of the total length, 5.2 km is anticipated to be new roads. The remaining 7.2 km will consist of existing forest roads, which will be improved to the road standards required by the Project. This design aims to maximise the use of existing forest roads, wherever technically feasible, in order to avoid additional land use and tree cutting. Final design of the roads will be done based on the results of further surveys to be conducted prior to the start of construction phase. The Project Company will inform the local communities about the route of the new roads to be constructed and associated environmental impacts (e.g. tree cutting) and consult with them once the road design is finalised.

The activities to be conducted in the land preparation and construction phase will include:

- Site preparation,
- Construction of site access roads and internal roads,
- Excavation activities for turbine tower foundations,
- Preparation of crane pads at each wind turbine location,
- Construction of turbine/tower foundations,
- Transportation of turbine components (including anchor cages, nacelles, hubs, blades and towers),
- Assembly of turbines on site,
- Connection with the existing ETL,
- Construction of the substation and the administrative building,
- Electrical works and installation of the control system,
- Connection of the WPP to the system, testing and commissioning, and
- Site re-instatement and restoration.

Following the commissioning of the system, Mersinli WPP is expected to generate electricity for a minimum of 20 years. With proper maintenance, the operational life of the Project could be further extended in line with the Electricity Generation License provided by EMRA.

During the construction phase, a total of 150 personnel will be employed; 120 employees are expected to be unskilled while the other 30 are expected to be skilled. Majority of the personnel (approximately 90% of the total workforce) will be employed through the contractors. The Community Liaison Officer-CLO and the site engineers (approximately 10% of the total workforce) will be employed directly by the Project Company.

On the other hand, number of operation phase personnel is estimated to be 14. This number is foreseen to consist of 4 unskilled and 10 skilled employees. The Project, to the extent possible, will supply its workforce from local communities, since multiple tasks such as; cable laying, security, cleaning, among other, allow the employment of local workforce. Contractors will be contractually required to maximize use of local workforce in the Project.

1.2 Key Environmental and Social Issues

As far as water usage, air emissions (including carbon dioxide) and waste generation are concerned, wind power is considered a green technology, as such impacts are mainly limited to the construction phases of the WPP projects. On the other hand, land requirements of the WPPs are considered relatively high, particularly due to the need of access roads and, if necessary, ETL construction. Area covered by each turbine foundation is generally limited, while the total area requirements increase as the capacity and the number of turbines in a project increases. During the construction phase of the Project, access to the construction sites will be temporarily restricted to avoid health and safety risks. As the Project's License Area and the turbines will not be fenced off (only switchyard will be fenced off) during the operation phase, there will be no access restriction during the operation phase of the Project.

In addition, potential impacts of the WPP projects on local communities due to visual changes, shadow-flicker, turbine noise, as well as on birds, bats, other fauna components, flora species and habitats are particular social and environmental aspects which require proper assessment and management in WPP projects.

In consideration of these, the key environmental and social issues identified for the Mersinli WPP Project through the ESIA process are summarised below:

- The License Area consists mainly of lands registered as forest and privately owned parcels (to a limited extent) used for agriculture. All of the Project units (including access roads and ETL connection) of the Mersinli WPP are located on registered forest lands covering a total area of around 31 ha. A Forestry Permit will be obtained from the Forestry authorities for the footprint areas of the turbines, access roads and other project units, which correspond entirely to registered forest lands. In the scope of this permit, the Project Company will be permitted to conduct activities only on the permitted areas. Registered forest lands located within the rest of the License Area will remain to be under the ownership and authority of the Ministry of Forestry and Water Affairs in line with the Forestry Law (Law No: 6831) and any activity to be conducted on these lands (e.g. logging) located within the License Area will be subject to the permit of the Ministry of Forestry and Water Affairs. The Project will not interfere with the activities (e.g. agriculture) currently being conducted on the privately owned parcels located within the rest of the License Area (none of them are corresponding to the footprint of the Project components) in line with the applicable national laws and regulations as it will be permitted to conduct its activities only within the area for which Forestry Permit exists. Activities (e.g. construction of buildings, business activities) to be conducted on the privately owned lands will be subject to the permitting of related authorities (e.g. Ministry of Food, Livestock and Agriculture, Municipality) depending on the registry type of the land (e.g. agricultural, building plot).
- Even though there are privately owned lands within the wider License Area, the Project will not involve acquisition of any privately owned land, as the footprint of the Project components correspond entirely to registered forest lands. On the other hand, at the location of Turbine-12, cherry plantation activities have been identified on the registered forest lands by 2 informal users. Consultations were held with the users of the land on 3 October 2017 and 20-22 December 2017 to obtain information about actual user status and their livelihood activities. According to these consultations, only 0.97 ha are used by one of the owners for cherry plantation activities (mainly for commercial purposes; the products are sold to market sellers who come to the neighbourhood). There are a total of 520 cherry trees, from 5 to 14 years old, as estimated by the owner. Approximately 300 of these trees are expected to be lost due to the construction activities of the Project. The rest of the land is not used by the second owner; the 0.62 ha are vacant as of January 2018, when a site visit was conducted.
- In all of the settlements located within a 5 km diameter area from the wind turbines (Çınardibi, Dernekli, Cumalı, Dereköy, Gökyaka, Yeşilköy, Dağtekke, Helvacı, Karakızlar, Karaot and Ormanköy), beekeeping has been identified as an income generating activity. The number of households conducting the activity changes from settlement to settlement. Dereköy and Dağtekke are the prominent settlements where the number of households conducting the activity is relatively higher. The number of registered beekeepers (having hives more than 25) in Dereköy is 48 and Dagtekke is 13 (none in Cinardibi and Gokyaka). Minimisation of dust to be generated during the construction phase is essential to avoid/mitigate potential impacts on the beekeeping activities. As reported by the local people, grazing and hunting activities are also conducted to a limited extent within the License Area. Consultation activities to be conducted with the local communities to minimise potential impacts are described in Section 5.

- A few residential buildings (eight dwellings in Marmariç Permaculture Village) have been identified within the Project's License Area. Additionally, a shed used temporarily for agricultural activities correspond to one of the registered forest parcels to be acquired by the Project. The environmental and social impacts of the Project on the users/residents of these buildings (including noise, shadow flicker and electromagnetic interference) have been assessed in the scope of ESIA studies. This is in line with the applicable international guidelines. Mitigation measures have been developed where necessary. Cumulative impacts of renewable energy projects in Turkey is a key issue raised by the local communities and NGO's and need to be properly addressed by the ESIA studies. The need for a detailed assessment of cumulative impacts of the Mersinli WPP Project was also a subject mentioned in the lawsuit petition filed for the Project. Therefore, a detailed Cumulative Impact Assessment (CIA), covering all the Project units including access roads and considering other existing and reasonably foreseeable projects that may contribute to the cumulative impacts in the area, was conducted for the Mersinli WP Project as part of the ESIA studies. It should be noted that the WPP projects concentrated in the Karaburun and Çeşme peninsulas (which are important touristic area in İzmir province) are located around 80-100 km west-northwest of the Mersinli WPP License Area. On the other hand, there are other WPP projects (33 MW Fuat WPP in operation since 2015; 3 MW Karabel WPP in operation since 2016; 9.2 MW Ege WPP in operation since 2015) located within the selected Cumulative Impact Area (identified based on the borders of the Boz Mountains KBA and other adjacent KBA's, namely Spil Mountain KBA and Nif Mountain KBA). Mersinli WPP, in terms of installed capacity and turbine numbers, will be the largest project within the selected Cumulative Impact Area.

In consideration of the key environmental and social issues identified in the local context, and the nature and scale of the Project, the ESIA conducted for the Mersinli WPP Project characterized the baseline conditions and assessed the potential impacts for the following subjects:

- Land Use, Soils and Geology,
- Noise
- Air Quality and Greenhouse Gas (GHG) Emissions
- Water and Wastewater
- Waste
- Biodiversity
- Visual
- Socio-economic impacts
- Occupational Health and Safety
- Community Health and Safety and traffic impacts
- Cultural Heritage
- Cumulative Impacts

The ESIA study has been structured to meet the requirements of IFIs in terms of Project description, alternative analysis, baseline characterisation, and impact assessment and management. It has also considered the Project's commitments contained in the existing EIA Report.

Components of the ESIA Disclosure Package include the following:

- Environmental and Social Impact Assessment (ESIA) Report and the Environmental and Social Management and Monitoring Plan(ESMMP) and
- National EIA (approved by the MoEU with the EIA Positive Decision dated 18 July 2016)
- Environmental and Social Management Plans:
 - Contractor Management Plan
 - Erosion Control, Soil and Spoil Management Plan
 - Noise Management Plan

- Air Quality Management Plan
- Waste Management Plan
- Chance Finds Procedure
- Non-Technical Summary (NTS)
- Stakeholder Engagement Plan (SEP) and the Grievance Procedure
- Livelihood Restoration and Compensation Framework (LRCF)
- Environmental and Social Action Plan (ESAP).

There are several additional plans and frameworks that will be disclosed within the ESIA studies. These documents are listed in ESIA Report, Chapter 19.

1.3 Social Impact Assessment

The social baseline and impact assessment studies in the scope of the Mersinli WPP Project have been conducted as a part of the Project's ESIA process. In this context, a Social Study Area of 5 km radius has been determined based on the Project's nature and scale, as well as the turbines' distances to the nearest settlements, including the potential social and economic impacts of the Project on local resources and receptors. A map of the Project's Social Study Area showing the main Project components and the nearby settlements is given in Figure 1.1 below. Information on the settlements located within the 5 km radius area is provided in Table 1-1. A summary of the consultations done in the scope of ESIA are described in Chapter 3 of this SEP.

Table 1-1. Settlements Closest to the Project Turbines

Settlement	District	Closest Turbine (WTG) to the Settlement	Approximate Distance of the Settlement to the Closest Turbine (km)	Direction of Settlement with respect to Turbine	Population (TurkStat, 2016)
Mersinli Locality of Dernekli neighbourhood (Marmariç Perm.)	Bayındır	WTG 17	1.0	South-east	14*
Dağtekke neighbourhood	Torbalı	WTG 16	1.6	South	169
Yeşilköy neighbourhood	Kemalpaşa	WTG 01	1.9	North	167
Çınardibi neighbourhood	Bayındır	WTG 11	1.9	North-east	822
Cumalı neighbourhood	Kemalpaşa	WTG 01	2.1	North	212
Karaot neighbourhood	Torbalı	WTG 01	2.1	West	282
Karakızlar neighbourhood	Torbalı	WTG 03	2.5	South-west	395
Dernekli neighbourhood	Bayındır	WTG 17	2.8	North-east	166

***Based on the information obtained during interviews with Marmariç Community Members, September 2017.*

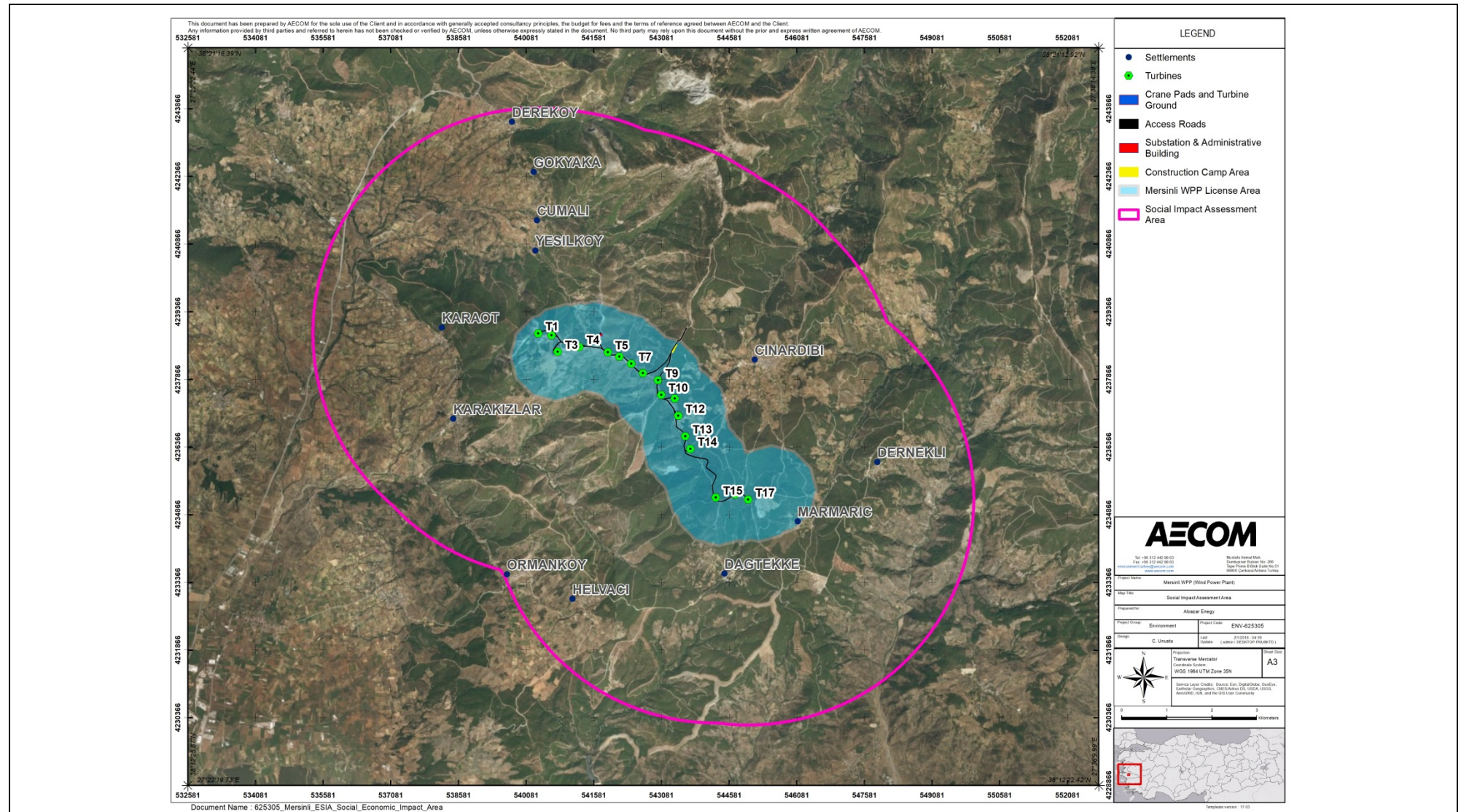


Figure 1-3. Social Study Area for Mersinli WPP Project

2. Regulatory Requirements of Stakeholder Engagement

Public engagement activities that have been identified in this SEP document and will be undertaken to support the Project implementation and will conform to:

- Relevant Turkish national legislation;
- Guidelines established by International Financial Institutions (IFIs), specifically EBRD's Environmental and Social Policy (2014) and the IFC's Performance Standards on Environmental and Social Sustainability (2012);
- Equator Principles III (2013); and
- International Conventions for Public Participation, in particular the United Nations Economic Commission for Europe (UNECE) Aarhus Convention² (as EBRD upholds the approach of this Convention, Turkey is not yet a party to this convention).

Further details of the relevant Turkish legislation and specific EBRD and IFC policy requirements and standards are given in the following sections.

2.1 National Requirements

Under the scope of the current Turkish Environmental Impact Assessment (EIA) Regulation (published in the Official Gazette dated 25 November 2014 and Numbered 29186), several references are made to information disclosure and stakeholder participation.

Regarding the participation of governmental stakeholders into the EIA process, a Scoping, Review and Evaluation Commission ("Commission") is established by the Ministry of Environment and Urbanisation ("MoEU") at the scoping phase of the EIA process. This Commission includes representatives from related governmental agencies and institutes (if deemed necessary depending on the scope and type of the project, universities, representatives of the relevant research organisations, experts, professional chambers, unions, associations and non-governmental organisations may be asked to participate in the Commission). Commission members review the relevant EIA documentation throughout the process (e.g. EIA Application File, EIA Report) and provide their official views in writing at the scoping, review and evaluation stages. Accordingly, establishment of this Commission ensures that central and local governmental institutions that are relevant to a project are involved in and contribute to the EIA process starting from the scoping until the issuance of final EIA decision including the review and evaluation stages.

Regarding the participation of the public into the process, it is a legal obligation for the project owner as per the 1st clause of Article 9 of the EIA Regulation to organize a Public Participation Meeting (PPM) at a location easily accessible by the people affected by the project mostly. The meeting is conducted on a date which is determined in agreement with the Ministry of Environment and Urbanisation (MoEU). The aim of the meeting is to inform project affected people about the investment and to get their opinions and comments regarding the project.

The Public Participation Meeting is chaired by the Provincial Director of Environment and Urbanisation or an official assigned by the Provincial Director. During the meeting, a brief and understandable presentation is given to the participants by the competent EIA Consultant. The opinions of participants are obtained, and necessary explanations made to address the questions and concerns of the participants. The issues raised by the public are documented in the official meeting minutes to be considered and addressed in the EIA Report. Copies of the official minutes of meeting are kept by the Governorate and the Ministry. Through this mechanism, Public Participation Meeting provides an open platform to all interested parties to participate and submit their views, concerns and questions about the Project.

Additionally, the 2nd clause of the same article of the EIA Regulation states that activities such as questionnaires and seminars/workshops can be conducted by the project owner to increase the level of public participation.

² The United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters.

Turkish EIA Regulation ensures information disclosure and stakeholder involvement at several stages starting from the scoping. In the scoping stage, the MoEU and the related provincial Governorate(s) announce to the public by using appropriate communication tools (e.g. announcements, notice boards, internet, etc.) that the EIA application has been made for the Project, EIA process has been started, and the views and proposals about the Project may be submitted to the Governorate or the MoEU until completion of EIA process.

Following the Public Participation Meeting, a Special EIA Report Format is prepared by the MoEU. In this process, the MoEU considers the views and proposals of the Commission (provided as official views) and the public (provided during the Public Participation Meeting). The EIA Report is then prepared in accordance with the Special Format.

Once the EIA Report is submitted to the MoEU for review, the MoEU and the related Governorate(s) announces to the public that the review process of the Commission has started. Appropriate communication tools (e.g. announcements, notice boards, internet, etc.) are used for the announcement. In parallel to Commission's review process, the Draft EIA Report is disclosed to public for comment. From the announcement date to the report finalisation through the Review and Evaluation Meeting(s), stakeholders can review the Draft EIA Report and submit their views and comments to the MoEU or the Governorate(s) (through Provincial Directorate of MoEU). These comments are taken into consideration by the Commission members during their review and evaluation of the Project. The EIA Consultant also addresses relevant views and comments in the EIA Report. A Review and Evaluation Commission Meeting is also held at the headquarters of the MoEU in Ankara with the involvement of absolute majority of the Commission members. In this meeting, questions or comments of the Commission members are answered and/or discussed and the views of the Commission members are obtained (in written) for finalizing the EIA report. The Report is then finalized in consideration of the governmental stakeholders represented by Commission members and the Final Draft EIA report is submitted to the MoEU for the final public disclosure.

Accordingly, the Final Draft of the EIA Report is disclosed by the MoEU and the related Governorate(s) for 10 calendar days through announcement boards and at the internet page of the MoEU. Any view or comment received from public in this context is considered by the MoEU in the decision-making process. Depending on the comments received from public, MoEU may request fulfilment of the deficiencies, execution of additional studies or regathering of the Commission. Finally, the MoEU requires the Consultant to submit the Final EIA report with a statement indicating that the report and its annexes are under the commitment of the project owner. Taking the Commission's evaluations and the public views, MoEU gives its "EIA Positive" or "EIA Negative" decision regarding the project. At the latest stage, the decision of the MoEU is also disclosed to public using appropriate means.

2.2 International Requirements

2.2.1 EBRD Performance Requirements

EBRD's performance requirements agree with the approach of the UNECE Aarhus Convention, which identifies the environment as a public good and considers stakeholder engagement as an essential part of good business practices, corporate citizenship, and a way of improving the quality of projects.

In addition, EBRD requires that the projects it supports conform with the purpose and goals of the Aarhus Convention. This Convention assures the rights of access to information, public participation in decision-making, and access to justice in environmental matters, therefore protecting people's rights to a healthy environment.

Within this scope, the Project Company will conform to EBRD disclosure and stakeholder engagement requirements as outlined in EBRD's Performance Requirements 1 and 10:

PR1:

- Identify and engage with stakeholders in accordance with PR10;
- Dynamic process of performance monitoring and evaluation, including the monitoring of stakeholder feedback, the local community or inspections by regulatory authorities; and
- Regular reporting to EBRD on stakeholder engagement during project implementation.

PR10:

- Identify people or communities that are affected or could be affected by the project, as well as other interested parties;
- Ensure that stakeholders are appropriately engaged on environmental and social issues that could potentially affect them; this is achieved through a process of information disclosure and meaningful consultation; and
- Pay special attention to the identification of vulnerable groups who are living in the project impact area; this is done to understand whether their livelihood and well-being is influenced by project activities.

Additionally, the key operational principles of effective engagement for EBRD projects are summarised as follows:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s);
- Providing information in advance of consultation activities and decision-making;
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate;
- Respect for local traditions, languages, timeframes, and decision-making processes;
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- Inclusiveness in representation of views, including ages, women and men, vulnerable and/or minority groups;
- Processes free of intimidation or coercion or incentivisation;
- Clear mechanisms for responding to people's concerns, suggestions and grievances; and
- Incorporating, where appropriate and feasible, feedback into project or program design, and reporting back to stakeholders.

2.2.2 IFC Performance Standards

IFC Performance Standards (PS) must be applied for the duration of a project financed by IFC or another financial institution adopting IFC standards. Among the IFC's PSs, PS1³ specifically relates to stakeholder engagement on the basis that it establishes the importance of: (i) integrated assessment to identify the social and environmental impacts, risks, and opportunities of projects; (ii) effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them; and (iii) management of social and environmental performance throughout the life of the Project. The objectives of this standard are as follows⁴:

- To identify and assess social and environment impacts, both adverse and beneficial, in the Project's Impact Area;
- To avoid, or where avoidance is not possible, minimize, mitigate, or compensate for adverse impacts on workers, affected communities, and the environment;
- To ensure that affected communities are appropriately engaged on issues that could potentially affect them; and
- To promote improved social and environment performance of companies through the effective use of management systems.

³ Performance Standard 1 is specifically relevant, because it contains clear requirements for community engagement, disclosure of information and consultation. These requirements are the main concerns of this SEP.

⁴ IFC Performance Standards, January 2012.

2.2.3 Equator Principles III

Under Principle 5 (Stakeholder Engagement), Equator Principles III requires all Category A and Category B Projects to demonstrate effective Stakeholder Engagement as an ongoing process in a structured and culturally appropriate manner with affected communities and, where relevant, other stakeholders. For Projects with potentially significant adverse impacts on affected communities, the client is required to conduct an Informed Consultation and Participation process.

Principle 6 (Grievance Mechanism) further requires establishment of a grievance mechanism for all Category A and, as appropriate, Category B Projects, which is designed to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance as part of the ESMS. The grievance mechanism is required to be scaled to the risks and impacts of the Project and have affected communities as its primary user. It will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the Affected Communities about the mechanism in the course of the Stakeholder Engagement process.

Regarding reporting and transparency, Principle 10 requires the client to make a summary of ESIA accessible and available online for all Category A and, as appropriate, Category B Projects.

3. Summary of Previous Stakeholder Engagement Activities

Stakeholder engagement activities conducted to date (as of February 2018) includes the activities conducted in the scope of previous national EIA process (i.e. public participation meeting conducted in Çınardibi neighbourhood, official correspondences and meetings conducted with the governmental stakeholders) and activities conducted as part of the ESIA process (i.e. public consultation meeting conducted in Cumalı neighbourhood, meetings with Marmariç Permaculture Village Community, regular consultations with key informants and project affected persons). A summary of the key activities conducted until February 2018 is provided in Table 3-1 and reported in Appendix A.

Table 3-1. Summary of Stakeholder Engagement Activities Conducted to Date (as of February 2018)

Process	Type of Activity	Stakeholders Consulted	Date	Number of Participants (in case of meetings)	Key Concerns/ Questions/Issues	Project Response/Comments
National EIA Process	Public Participation Meeting	Çınardibi neighbourhood	24 August 2015	10	The national EIA Report mentions that the questions of the participants raised during this meeting were responded by the Project Owner.	The national EIA Report mentions that the Project Owner provided information on the justification of site selection, importance of and need for the Project, and the procedures to be followed in the next stages of the Project.
	Correspondence with Governmental Authorities	<ul style="list-style-type: none"> • Ministry of Environment and Urbanisation • Ministry of Energy and Natural Resources • Ministry of Transport, Maritime and Communication • Ministry of Culture and Tourism • İzmir Governorate, Provincial Directorate of Environment and Urbanisation • Ministry of Forestry and Water Affairs, General Directorate of Forestry, İzmir Regional Directorate • İzmir Greater Municipality • Bayındır Municipality • Kemalpaşa Municipality • Torbalı Municipality • Ministry of Culture and Tourism • Ministry of Forestry and Water Affairs • Ministry of National Defense • İzmir Governorate, Provincial Directorate of Food, Agriculture and Livestock 	2014-2015		Environmental and social measures/ commitments for compliance with applicable legislation of the governmental institutions (see Chapter 2 of the national EIA Report and its appendices between 5 and 18)	The Project Company committed in the relevant sections of the national EIA Report to meeting the requirements of the related institutions mentioned in their opinion letters.
ESIA Process	Public Consultation Meeting in Cumalı neighbourhood	Local community (Cumalı and Yeşilköy)	4 October 2017	32	<ul style="list-style-type: none"> • Benefits of the Project to the local people (e.g. employment opportunities, infrastructure developments etc.) • Locations of the turbines and access roads • Potential environmental impacts (i.e. noise, dust) • Impacts due to traffic • Access restrictions 	<ul style="list-style-type: none"> • Potential environment and social impacts and benefits of the Project were explained to the participants • All the comments and suggestions were noted.

Process	Type of Activity	Stakeholders Consulted	Date	Number of Participants (in case of meetings)	Key Concerns/ Questions/Issues	Project Response/Comments
	Meetings with local communities	Marmariç Permaculture Village Community	13 July 2017 28 July 2017 3 October 2017 7 February 2018	7	<ul style="list-style-type: none"> • Project Design • Future land use restrictions in the licensed area and excluding the Claimants' land/assets from the licensed area • Potential extension of Project/ capacity increase • Legal court case against the Project, Land acquisition and livelihood impacts • Visual impacts • Noise impacts • Shadow flicker • Potential change in electromagnetic impact standards • Community health and safety issues and traffic impacts • Socio-economic impacts • Tree cutting and impact on biodiversity • Cumulative impacts • Stakeholder engagement and the need for an ongoing consultation with the affected people • Monitoring of environmental and social impacts during construction and operation 	<ul style="list-style-type: none"> • The Project Company committed to address the concerns of the community in line with proper administrative and technical processes. The following measures were committed to be taken and the community was informed about these measures during the meetings conducted and also in written: <ul style="list-style-type: none"> - Ensure that the agricultural activities of the community (on the parcels located within the License Area) are not affected by the Project in cooperation with the related governmental institutions where necessary - Inform the community regarding any tree cutting activities - Inform the community about all the monitoring activities and their results, • Information on the current Project design was provided and potential environmental and social impacts, mitigation measures to be taken and benefits of the Project were explained to the community members • Relevant mitigation measures were also addressed during the meeting and comments on the proposed measures were noted. Proposed mitigation measures are as follows: <ul style="list-style-type: none"> - Develop Biodiversity Action Plan - Sign Reforestation Protocol with the Forestry Authorities - Implement Reforestation Programme - Conduct construction activities at the work sites located closest to the noise sensitive receptors only during day time - Optimise turbine operation in consideration of wind speed to avoid noise becoming unacceptable

Process	Type of Activity	Stakeholders Consulted	Date	Number of Participants (in case of meetings)	Key Concerns/ Questions/Issues	Project Response/Comments
						<ul style="list-style-type: none"> - Implement Noise Management Plan - Implement the Stakeholder Engagement Plan to collect complaints and suggestions through the grievance mechanism to be established - Conduct noise monitoring programme to verify compliance with regulatory limits and Project standards - Use underground cable system.
	Consultations with Key Informants	Neighbourhood headmen of the Cumalı, Çınardibi, Dağtekke, Dernekli, Dereköy, Gökyaka, Helvacı, Karakızlar, Karaot, Ormanköy, and Yeşilköy	October 2017	N/A	<ul style="list-style-type: none"> • Project design • Potential environment and social impacts and benefits of the Project 	<ul style="list-style-type: none"> • Potential environment and social impacts and benefits of the Project were explained to the headmen • Information on baseline socio-economic conditions of the neighbourhoods were obtained
	Consultations with Project Affected Persons (Forest Land users)	Persons using the registered forest lands corresponding to turbine locations and their vicinity for agricultural purposes-mainly cherry production	3 October 2017 20-22 December 2017	2 (Users of the registered forest parcels 277/1 and 277/2)	<ul style="list-style-type: none"> • Impact of the Project on the existing income generating activities conducted on the affected forest parcels • Eligibility of informal land users for compensation 	<ul style="list-style-type: none"> • Actual users of the lands were identified and possible livelihood restoration strategies were discussed with the land users
	Consultation with Governmental Authorities	Izmir General Directorate of National Estate Kemalpasa District Directorate of Food, Agriculture and Livestock Bayındır District Directorate of Agriculture Bayındır Forest Sub-district Directorate	20-22 December 2017	N/A	<ul style="list-style-type: none"> • Legal status of the affected lands • Current socio-economic activities based on agriculture around the region. • Potential social impacts and the benefits of the Project 	<ul style="list-style-type: none"> • Information on legal status of the affected lands were understood. • Baseline socio-economic information was obtained. • Potential social impacts and benefits of the Project were explained to the Directors.
	NGOs	Izmir Beekeepers Association (Agricultural Engineer)	22 December 2017	1	<ul style="list-style-type: none"> • Project potential impacts on beekeeping activities • Anticipated livelihood strategies that can be provided to the beekeepers 	<ul style="list-style-type: none"> • Project potential impacts on beekeeping activities are discussed with the engineer. Relevant mitigation measures were also explained by the engineer. • Planned livelihood restoration strategies are addressed during the meeting.
	Consultations with Key Informants	Neighbourhood Headmen of Cinardibi and Dagtekke	20 December 2017	2	<ul style="list-style-type: none"> • Project design • Potential environment and social impacts and benefits of the Project 	<ul style="list-style-type: none"> • Baseline socio-economic information of the settlements were obtained.

Process	Type of Activity	Stakeholders Consulted	Date	Number of Participants (in case of meetings)	Key Concerns/ Questions/Issues	Project Response/Comments
National permitting process	Correspondence, meetings	Energy Market Regulation Authority (EMRA) -Ministry of Environment and Urbanization -Ministry of Forestry and Water Affairs, General Directorate of Forestry - Ministry of Energy and Natural Resources -Ministry of Culture and Tourism (and relevant Regional Boards for Conservation) -Ministry of Transport, Maritime Affairs and Communications, General Directorate of Civil Aviation and General Directorate of State Airport Authority; Scientific and Technological Research Council of Turkey (TÜBİTAK) – RAPSİM -Turkish Electricity Transmission Company -Metropolitan Municipality of Izmir -Municipality of Bayındır District -Municipality of Kemalpaşa District -Municipality of Torbalı District	Between 2012-ongoing	N/A	<ul style="list-style-type: none"> • Licensing, permitting and approval processes in accordance with the national legislation: <ul style="list-style-type: none"> - Energy Generation License - EIA Positive Certificate for the WPP - ETL Connection and System Use Approval - Forestry Permit - Zoning Plan Approval - Civil Aviation/Radar Approval - Design Approval - Building Permit - Workplace and Operating Permit - Waste Management Plan approval 	<ul style="list-style-type: none"> • The license covers 49 years of energy generation. The Project Company obtained a revised license for the current turbine layout on 5 January 2018. • Confirmation of validity of the existing EIA Positive Certificate for the current layout has been obtained on 1 November 2017 • ETL Connection and System Use Approval to be signed during the course of further development (connection agreement) and before preliminary acceptance of the power plant (system usage agreement) • Other permits and approval will be obtained prior to start of the relevant phase of the Project in accordance with the applicable national legislation. •

4. Stakeholder Identification

In line with the definitions of international standards, this SEP recognizes a stakeholder as any individual, organisation or group that is potentially affected by the Project or that has an interest in the Project and its impacts. The purpose of stakeholder identification is to determine and prioritize Project stakeholders for consultation that may be affected (either directly or indirectly in positive or negative way) by the Project or that have an interest in the Project but are not necessarily directly impacted by the Project. As part of the stakeholder identification process, it is also important to identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status.

Within the scope of the SEP prepared for the Mersinli WPP Project as a part of the ESIA process, key Project stakeholders have been identified. The stakeholders that have been identified as being affected by or potentially interested in the Project are listed in Table 4-1.

Table 4-1. Stakeholder Groups and Other Key Affected Parties

Stakeholder Groups	Definitive Stakeholders	Summary of Specific Interest/Relevance
External Stakeholders		
National Governmental Organisations	Ministry of Energy and Natural Resources EMRA (EPDK) Turkish Electricity Transmission Company (TEIAS) Ministry of Forestry and Water Affairs Ministry of Environment and Urbanisation Ministry of Culture and Tourism Ministry of Transport, Maritime and Communication Ministry of National Defence Ministry of Labour and Social Security Cadastral Office? Ministry of Transportation – for Roads?	National and regional development Policy formulation Permitting Protection of employee and public safety Regulation foreign workers Cultural heritage protection Land-related issues Transport related issues
Local Governmental Organisations	Governorship of İzmir (including Provincial Directorate of Environment and Urbanisation, Food, Agriculture and Livestock, Culture and Tourism) Bayındır District Governorate Kemalpaşa District Governorate Torbalı District Governorate İzmir Regional Directorate of Forestry İzmir Metropolitan Municipality Bayındır Municipality Kemalpaşa Municipality Torbalı Municipality	Social and economic development Environmental protection Management of environmental impacts (e.g. wastes, wastewater) Permitting
Non-governmental Organisations (NGO's) – international, national and local	Nature Association (Doğa Derneği) Environment Foundation of Turkey WWF Turkey Turkish Wind Energy Association (TWEA) İzmir Branch Office of Union of Chambers of Turkish Engineers and Architects (TMMOB) Beekeepers Association in İzmir	National and local environmental impacts and economic development
Local Communities/Residents	Çınardibi Neighbourhood Cumalı Neighbourhood Dağteke Neighbourhood Dereköy Neighbourhood Dernekli Neighbourhood Gokyaka Neighbourhood Helvacı Neighbourhood Karakızlar Neighbourhood Karaot Neighbourhood Marmariç Permaculture Village Ormanköy Neighbourhood Yesilköy Neighbourhood	Noise, visual and dust nuisance and other environmental and social impacts Income loss Land acquisition Employment

Stakeholder Groups	Definitive Stakeholders	Summary of Specific Interest/Relevance
	Local communities using the License Area for agricultural and stockbreeding purposes (e.g. beekeepers within the License Area) Women associations (i.e. Dereköy Women Solidarity Association) Vulnerable groups in the affected villages (i.e. poor, single headed women, disabled, children etc).	
Local Businesses	Local Enterprises	Route development Inward investment
Other WPPs	Fuat WPP	Management of cumulative impacts
Public Economic Enterprises	Turkish Electricity Transmission Company (TEIAS)	Implementation of infrastructure services Operation and maintenance of Project's ETL
Universities	İzmir Ege University İzmir Dokuz Eylül University İzmir Ekonomi University	Technical Consultancy
Local and national Media	Local/ national newspapers, local television channels, etc.	Relaying correct Project information to communities Advertisements
Lenders	International finance institutions (including private banks)	Project finance
Internal Stakeholders		
Company	Employees Contractors and Sub-contractors and their Employees Trade Unions	Retrenchment, training, Occupational health and safety, employee grievance Local employment opportunities and local employment KPIs to be included into contracts
Company Shareholders	All shareholders including International Finance Corporation (IFC)	Reputation with regard to Environmental and Social Performance of the Project Business growth and shareholder value

A detailed list including contact details of the key stakeholders is given in Appendix B.

Organisations or groups which are not listed and wish to be informed about the Project, are invited to contact the Project Company (see Chapter 11 for contact details for the public) to add their contact information to the list. This SEP is a living document and will be updated and revised as necessary, including the list of Project stakeholders.

5. Future Stakeholder Engagement Programme

5.1 Disclosure of Information

To ensure effective and meaningful engagement with different stakeholder groups, the Project Company will use various methods of communication and information throughout construction, operation and decommissioning phases of the Mersinli WPP Project. Above all, electronic copies of the following documents (ESIA Disclosure Package) will be disclosed to public (in Turkish and in English) on Alcazar Energy's internet site (<http://alcazarenergy.com/our-projects/>) for 60 days as required by the Lenders Project Information Policy. Lender's web sites (<http://www.ebrd.com>) to allow stakeholders with access to internet to view information about the planned development and to initiate their involvement in the public consultation process:

ESIA DISCLOSURE PACKAGE

- ESIA Report (including the Environmental and Social Management and Monitoring Plan (ESMMP))
- National EIA (which was approved by Turkish authorities with the EIA Positive Decision dated 18 July 2016)
- Some of the key Environmental and Social Management plans including:
 - Chance Finds Procedure
 - Air Quality Management Plan
 - Erosion Control, Soil and Spoil Management Plan
 - Noise Management Plan
 - Waste Management Plan
 - Livelihood Restoration and Compensation Framework (LRCF)
 - Stakeholder Engagement Plan (SEP) (including the Grievance Procedure).
- Non-Technical Summary (NTS); and
- An Environmental and Social Action Plan (ESAP)

It is envisaged that electronic copies of the relevant ESIA documents (i.e. ESIA Report, NTS and SEP) will remain in the public domain for the duration of the Project and that this SEP will be updated periodically and will remain publicly available on the web-site and in the offices of the Project Company in Turkish. Information on the ESIA disclosure will be sent to the e-mails of the directly affected community members in order to reach to the absentee landowners/users (those who are not in the neighbourhood) during the disclosure process.

In addition to electronic copies, hard copies of the documents comprising the ESIA Disclosure Package will also be available at the related Municipalities, Project's site office and the headmen's offices at the selected settlements (Cumalı,Çınardibi) and Marmaric Permaculture Village). Leaflets and brochures will be prepared to disseminate information to public on a contextually appropriate way.

- **Full ESIA documentation to be available locally at:**

- Yander's Istanbul Office:

Address: Buyukdere cad. Kanyon Ofis Binasi, No: 185, Kat: 6 Istanbul

Tel: +90 (212) 319 7659

- Izmir Governorship, address:

Address: Hukümet Konagi, Konak / IZMİR

Tel: +90 (232) 455 8282

- Bayındır District sub governorships,

Address: Mithatpasa mah. Hukümet Onu cad. No: 1 Bayındır / IZMİR

Tel: +90 (232) 581 4001

- Kemalpaşa District sub governorships

Address: Mehmet Akif Ersoy mah. Atatürk Bulv. No: 27 Kemalpaşa / IZMİR

Tel: +90 (232) 878 1882

- Torbalı District sub governorships

Address: Ertugrul mah. Mithatpasa cad. Hukümet Konagi Torbalı / IZMİR

- Bayındır Municipality

Address: Mithatpasa mah. Atatürk cad. No: 32 Bayındır / IZMİR

Tel: +90 (232) 581 5000

- Kemalpaşa Municipality

Address: Mehmet Akif Ersoy mah. İsmet İnönü cad. No: 111 Kemalpaşa / IZMİR

Tel: +90 (232) 988 1111

- Torbalı Municipality

Address: Tepekoy mah. Atatürk Meydanı No : 1 Torbalı / IZMİR

Tel: +90 (232) 856 6666

and

- Cumalı Neighbourhood Headman Office,

Address: Cumalı Neighbourhood, 35730, Kemalpaşa, İzmir

- Çınardibi Neighbourhood Headman Office

Address: Çınardibi Neighbourhood, 35840, Bayındır, İzmir

- Marmariç Permaculture Village,

Address: Dernekli Neighbourhood, 35840, Bayındır, İzmir

- EBRD Resident Office in Istanbul,

Address: Büyükdere Caddesi, 185, Kanyon Ofis Binası, Kat: 2, Levent, 34394 Istanbul, Turkey

Tel: +90 (212) 386 1100

5.2 ESIA Disclosure Meetings

- The Disclosure meetings will take place 3-4 weeks after the ESIA is disclosed to ensure local stakeholders are given enough time to review the ESIA package and provide feedback during the meetings.
- The Project Company will conduct disclosure meetings with the affected communities in April 2018 at the below locations. There will also be women only disclosure meetings at these locations.
 - Çınardibi Neighbourhood
 - Cumalı Neighbourhood
 - Dağteke Neighbourhood
 - Dereköy Neighbourhood
 - Dernekli Neighbourhood
 - Gokyaka Neighbourhood
 - Helvacı Neighbourhood
 - Karakızlar Neighbourhood
 - Karaot Neighbourhood
 - Marmariç Permaculture Village
 - Ormankoy Neighbourhood
 - Yesilkoy Neighbourhood

Exact dates and venues of these meetings will be announced minimum one week prior to the meetings dates, in order to ensure participation of the communities and other regional stakeholders to these meetings.

During this engagement phase, disclosure and consultation activities will be designed along the following general principles:

- Consultation events and opportunities must be widely and proactively publicized, especially among Project affected parties, at least 1 week prior to any meeting;
- The non-technical summary must be accessible prior to any event to ensure that people are informed of the assessment content and conclusions in advance of the meeting;
- The location and timing of any meeting will be designed to maximise accessibility to Project affected stakeholders;
- Information presented will be clear and non-technical, and will be presented in the local language understood by those in the communities;
- Facilitation will be provided to ensure that stakeholders are able to raise their concerns;
- Issues raised are answered at the meeting or actively followed up.
- Information provision meetings will be open to all public and will be announced through local media. They will be held at neighbourhood mukhtar offices or village cafes/teahouses depending on availability. Other venues frequented by women will also be utilised for women only meetings.

The Project Company will inform the public, via newspapers, meetings, media and other similar means, about how people can access the ESIA documents and Project time table, and how they can make comments on the ESIA disclosure package. The following template will be used.

The Project Company welcomes comments and observations on the ESIA Disclosure Package (Environmental Social Impacts and Management Plans) for Construction and Operation Phases of Mersinli Wind Power Plant (WPP) Project and will endeavour to provide responses to all queries and comments received during the 60-day disclosure period. (March-April 2018)

You are welcomed to contact us through the contact details provided below.

At the end of 60 days disclosure process, the Project Company will prepare a **Public Disclosure Report (PDR)** explaining the disclosure and consultation process and activities undertaken, the concerns, questions asked and responses provided during public disclosure meetings and/or the comments, questions and answers provided from other sources such as reports and letters, feedback on the media as well as any actions to be followed up with the stakeholders during or after the disclosure process and will also explain how the Project has considered the comments and/or suggestions raised by stakeholders within the ESIA and ESMPs (if any revision required).

Biannual environmental and social reports including monitoring data will be prepared and submitted to the Lenders (i.e. EBRD) during the construction phase and first year of the operation phase. Frequency for the subsequent operation period will be determined at the end of first operation years in consideration of the results of the existing monitoring studies, environmental and social reports, etc.. In this respect, Table 5-1 summarises the type of information to be shared with each stakeholder group and the specific methods for communication/consultation to be used for stakeholder engagement.

Particularly in consultations with and information of the local communities, elected neighbourhood headmen ("Muhtars") will play an intermediary role by acting as a bridge between communities and external stakeholders from outside their localities. Regular meetings will be conducted with the headmen and community representatives to inform them about the Project development accurately. A Community Liaison Officer (CLO) has already been appointed by the Project Company in November 2017. The CLO will play a key role in maintaining relations with the local communities and other relevant local stakeholders including NGOs and governmental authorities, etc.

Participatory Monitoring System during Construction and Operation of the WPP will be considered during construction and operation phase as it is one of the most effective ways to help satisfy stakeholder concerns (particularly visual and noise impact, soil and air emission/dust issues and impacts on biodiversity) and promote transparency is to involve project-affected stakeholders in monitoring the implementation of mitigation measures or other environmental and social programs. Such participation, and the flow of information generated through this process, can also encourage local stakeholders to take a greater degree of responsibility for their environment and welfare in relation to the Project, and to feel empowered that they can do something practical to address issues that affect their lives. The Project Company will discuss this opportunity with the stakeholders during the ESIA disclosure process.

Table 5-1. Information/Documents to be Shared and Methods to be Used for Information/Communication

Stakeholder Group	Information/Documents to be Shared	Method of Information/Communication										Project Phase				Frequency				Parties (Other than CLO) Responsible from Implementation	
		Community Liaison Officer (CLO)	Electronic publications and press releases on Company website	ESIA Disclosure Package (hard copy) at neighbourhood headmen offices, Project office	Press releases in the local media for the announcements regarding information events (i.e. community meetings, etc.)	Focus group meetings	Regular meetings	Distribution of information leaflets and brochures (neighbourhood headmen's offices, teahouses, etc.)	Correspondences and telephone calls	Procurement announcements at public areas and boards	Land Preparation	Construction	Operation	Decommissioning	Monthly	Quarterly	Semi-annually	Annually	Contractors	Project's Environmental Manager/Expert	External Experts
Local communities in the Project's Impact Area	-ESIA Disclosure Package (ESIA Report, NTS, SEP)	√	√	√	√	√	√	√	√	√											
	-Public Grievance Procedure	√	√	√	√	√	√	√	√	√											
	-Update notes on Project development	√	√				√	√	√		√	√	√	√			√				
	-Job vacancies	√	√								√	√	√	√			√			√	
	-Up-to-date Project schedule	√	√				√	√	√		√	√	√	√			√			√	
Vulnerable groups (e.g. women headed households, disabled people)	-Public Grievance Procedure -Up-to-date Project schedule	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√					
Non-governmental organisations	- ESIA Disclosure Package (ESIA Report, NTS, SEP) -Update notes on Project development		√				√	√			√						√				√
Government authorities and agencies (including Public Economic Enterprises)	- ESIA Disclosure Package (ESIA Report, NTS, SEP) -Update notes on Project development (inc. any change in the design) -Relevant technical Project information if required for the purposes of regulation and permitting (i.e. drawings, maps, technical memos, Project status reports)			√			√		√								√			√	√
Local businesses, recruitment agencies	-Public Grievance Procedure -Update notes on Project development and tender announcements	√	√					√		√	√	√		√			√		√	√	
Universities	Relevant technical Project information						√											√			√
Other WPPs	-Public Grievance Procedure -Relevant technical Project information -Up-to-date Project schedule	√					√											√		√	
Lenders	-ESIA Disclosure Package (ESIA Report, NTS, SEP) -ESAP and relevant Monitoring Reports -Annual Reports on Environmental and Social Performance of the Project		√				√		√									√		√	√

5.3 Pre-construction Consultation Meetings

Before the start of land preparation and construction activities, the following specific activities will be conducted:

- Public Consultation Meeting in all affected villages including Çınardibi Neighbourhood (in agreement with the neighbourhood headman);
- Focus group meetings with women in selected neighbourhoods will be held by the CLO and a women interviewer (an expert in her field).
- In order to identify all vulnerable and disadvantageous groups living in the settlements, additional interviews (both formal and informal) will be conducted with the key informants (e.g. neighbourhood headmen, imams, neighbourhood teachers);
- Consultation with vulnerable people will be managed by CLO and external experts when necessary. Especially, vulnerable groups will have priority to involve Project specific Community Development related activities;
- Direct communication (through the CLO) and consultation will be maintained with the beekeepers within the License Area to inform them about the planned activities and their schedule;
- Update notes on Project development will be shared with the neighbourhood headmen;
- Precautions preventing damages over infrastructure and public and private properties (roads, electric network, walls, fences etc.) and relevant mitigation measures against dust, vibration and noise
- Design of Capacity development program for local people through targeted training programs internally and with key external training partners
- Community Development Programme that will be provided to the affected communities by the Project Company
- Information on the grievance mechanism, local employment opportunities, recruitment process will be shared with the neighbourhood headmen and local communities via the CLO
- Opportunities regarding the procurement of supplies and services will be shared with the neighbourhood headmen and local business via the CLO.

5.4 Consultation throughout the Construction Phase

During the construction phase of the Project following information will be shared with stakeholders:

- Update notes on Project development;
- Precautions preventing damages over infrastructure and public and private properties (roads, electric network, walls, fences etc.) and relevant mitigation measures against dust, vibration and noise
- Design of Capacity development program for local people through targeted training programs internally and with key external training partners
- Job vacancies;
- Up to date Project schedule;
- Procurement of supplies and services; and
- Community Development Programme that will be provided to the affected communities by the Project Company

Direct communication (through the CLO) and consultation with the beekeepers within the License Area will also be continued to inform them about the planned activities and their schedule.

A detailed information/documents to be shared and methods to be used for information/communication are presented in Table 5-1.

5.5 Consultation during the Operation Phase

During the operation phase of the Project following information will be shared with stakeholders:

- Scheduling for commissioning activities and potential impacts on health and safety measures/ mechanisms;
- Provision of information on Grievance Procedure and Grievance Resolution Process during operation phase;
- Provide training on Company policies (employees and contractors) on respectful and appropriate behaviours with communities;
- Relevant mitigation measures against noise and vibration;
- Periodic monitoring of contract implementation with communities; and
- Community Development Programme that will be provided to the affected communities by the Project Company.

5.6 Engagement with Internal Stakeholders

To engage with the internal stakeholders, including direct employees of the Project Company and the contracted workers, and inform them about the Project developments and internal mechanisms, the following particular methods will be used:

- Regular meetings with the staff
- Distribution of staff handbook (including information on the grievance procedure)
- Email updates covering the Company personnel
- Posts on information boards
- Leaflets

6. Grievance Mechanism

Managing, avoiding, minimizing and effective handling of grievances is an integral part of a sound stakeholder engagement strategy. Experience indicates that significant numbers of grievances arise from misunderstandings, and that such grievances can be avoided, or reduced, through proactive and consistent engagement with communities. Engagement also helps anticipate and review community concerns to prevent them from escalating to grievances. For this reason, the following Grievance Mechanism will be implemented by the Project Company throughout the Project life.

6.1 Objectives

A specific Project grievance mechanism is useful for:

- Addressing community and individual concerns and complaints before they escalate beyond control;
- Reducing developers/project executing agencies exposure to litigation – and related risks and costs;
- Identify and implement appropriate and mutually acceptable actions to address complaints;
- Ensure that complainants are satisfied with outcomes of the corrective actions; and
- Avoid the tendency to resort to judicial proceedings.

Grievances are useful indicators of a Project's environmental and social performance. High number of grievances may point out a need to adjust work practices or procedures in order to mitigate adverse effect or conflicts with the stakeholders.

6.2 Types of Grievances

Table 6-1 summarizes different types of grievances that may arise during planning/preparation, construction and operation phases of the Project.

Table 6-1. Types of Potential Grievances during Planning/Preparation, Construction and Operation Phases of the Project

Planning/Preparation Phase	Construction Phase	Operation Phase
-Misconduct of Project personnel/workers -Insufficient information	-Environmental pollution -Disruption or damages to local roads -Closure of passageways -Nuisance from dust, noise and vibration -Disruption or damages to infrastructures -Damages to livestock and other means of livelihood -Population influx -Misconduct of Project personnel/workers -Increase in the traffic load -Community health and safety impacts -Health problems, injuries and accidents -Unfair employment/procurement opportunities for the locals -Restriction of access to any cultural heritage elements that are important to the local communities	-Insufficient information -Misconduct of Project personnel/workers

Note: Physical resettlement is not expected in the Project.

6.3 Grievance Procedure

Information regarding the procedure and channels (e.g. phone, e-mail address, and website) that can be used to lodge grievances will be provided in all nearby settlements within the Project Impact Area and on the Company website. A Public Grievance Form, which will be used to receive a grievance, is provided, in Appendix C. Once the Grievance Form is received, a Grievance Register Form will be filled by the CLO. Additionally; the Project Company will set up grievance boxes in the settlements. These boxes will be available in an accessible location such as neighbourhood coffee houses, headmen offices etc. Contractor related grievances will also handled through existing grievance mechanism. The Project Company has already employed a CLO, who will also be responsible for the management of potential grievances and for the Grievance Procedure. The Project Company's CLO will be on-site and coordinate all the stakeholder engagement processes including the implementation of the grievance procedure defined in this SEP. Each complaint whether from an individual, entity or a community will be considered. A response to each specific complaint will be communicated to the party that raised it (complainant). A formal procedure will be used to log the key information provided by a complainant and to record any related incoming communications. All the grievances will be aimed to be resolved within 30 days. A record of actions taken and resolutions agreed as a result of the grievance investigation will also be documented. Once the grievance will be resolved in agreed with the complainant, a grievance close-out form (see Appendix D) will be filled by the CLO. Monitoring of the necessary actions that need to be taken will be carried out by the responsible party. Whenever the Company is not able to resolve the complaint in 30 days due to a justified reason, the required extension will be explained to the complainants. A sample leaflet on how to report a grievance is presented in Appendix E.

Overall, grievances will be registered and will include all grievances, whether received in writing or verbally. The complainant will receive an acknowledgement of the receipt of the complaint within a reasonable timeframe; this will be completed in writing.

The Project Company aims to establish a formalized procedure, ensuring that it is responsive to any concerns and complaints from affected stakeholders and communities. Where training is necessary for the staff involved in the management of the grievance mechanism, The Project Company will ensure that such training is provided in a timely manner.

The implementation of the Grievance Procedure by the Project Company for the Project will be under the day to day responsibility of the formally designated CLO. Grievance boxes will be placed by the Project Company (main entrance), at the neighbourhood headmen's offices in selected settlements (Cumalı and Çınardibi) to facilitate collection of grievances. The grievance process for the Project is presented in Figure 6-1. The CLO will also manage grievances that received from different channels (such as BIMER). Contractors will not directly involve in resolving grievances. When they received a complaint or suggestion from local communities, contractor employees will inform the complainants about the relevant grievance mechanism. Relevant training on grievance mechanism will be given to the contractor employees by the Project Company.

If the complainant is not satisfied with the solutions proposed and implemented by the Project Company to address the raised comment or grievance, the complainant is free to seek other mediation or legal remedies in accordance with Turkish law.

The grievance procedure will also cover employee and non-employee grievances. Internal grievances will be handled by the Project Company's HR Department and contractor employees will have also access to the employee grievance mechanism. Employee suggestion boxes will be available at the construction camp sites and grievance mechanism for workers will be relying on following aspects:

- Transparency
- Impartiality
- Confidentiality
- Accessibility

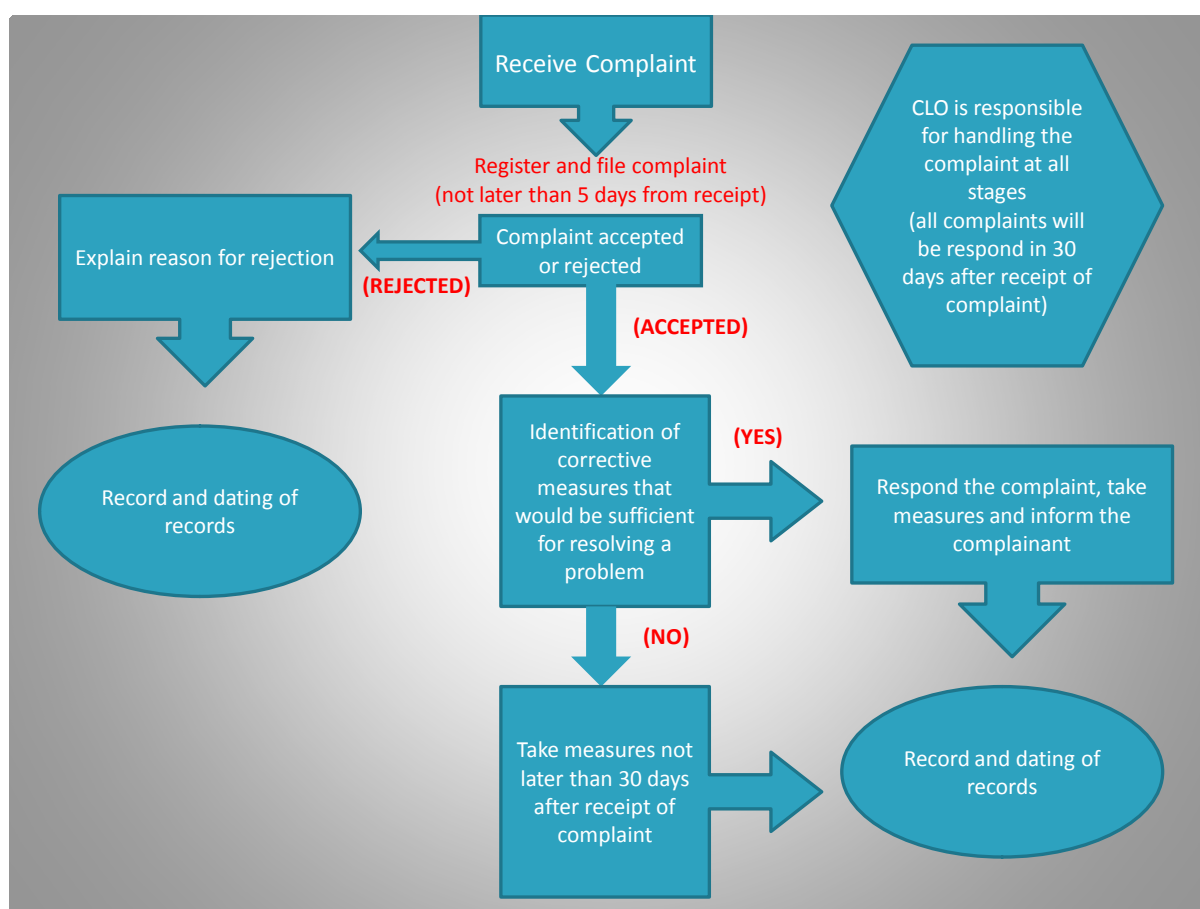


Figure 6-1. Grievance Procedure Diagram

7. Timetable

Actions and provisional dates with regard to information disclosure and stakeholder consultation are determined as given in Table 7-1. Exact timetable and frequency of the activities will be specified in the due course and the SEP will be updated accordingly.

Table 7-1. Tentative Timetable for Stakeholder Meetings and Information Disclosure

Activity/Event	Timetable
Establishment of Grievance Mechanism	2018 Q1 (prior to disclosure process)
Dissemination of hard copies of the ESIA Report, NTS and SEP	2018 Q1
Announcement at local gazette, dissemination of information	2018 Q1
Disclosure Meetings with affected villages	2018 Q1 and Q2
Preconstruction phase Meetings	2018 Q2
Construction Phase consultation (includes land acquisition and recruitment issues)	2018 Q3
Operation Phase stakeholder management activities	2019 Q2

The Project Company will continue to hold stakeholder meetings and carry out information disclosure activities to the extent possible in the future.

8. Monitoring and Reporting

The SEP will be periodically reviewed and updated, as necessary, during the course of the Project implementation.

Monthly summaries of grievances, queries and related incidents together with the implementation status of corrective/preventive actions will be referred to The Project Company's senior management. The monthly summaries will be used to assess both the number and nature of complaints (if any), along with Project Company's ability to address complaints in a timely and effective manner.

Summary reports will be disclosed at the Project Company's office and also included in the monthly and annual project reports.

Where appropriate, during all engagement activities, questions will be asked to stakeholders on the effectiveness of the meeting and the process of stakeholder engagement and effectiveness of the grievance mechanism. These questions will be tailored for the engaged stakeholder but would address mainly;

- Transparency of the engagement process
- Provision of relevant information
- Timely response on questions
- Clarity of the information provided
- Applicability and relevancy of the information provided

8.1 Key Performance Indicators (KPI)

The table below summarises the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of proposed mitigation strategies

Table 8-1. Key Performance Indicators

Key Performance Indicators ID	KPI	Target	Monitoring Measure
SEP-Mersinli -KPI-01	Number of community complaints or grievances	Total number reduced year on year	Complaints Log/ Database
SEP Mersinli -KPI-02	Number complaints resolved within one month	Target of 100%	Complaints Log/ Database
SEP Mersinli -KPI-03	Reporting back to stakeholders on implementation of the Grievance Procedure	Delivery of regular reports to stakeholders on the outcomes of the Grievance Procedure	Reporting
SEP Mersinli -KPI-04	Auditing Grievance Procedure to ensure that it is being implemented and grievances are being adequately addressed.	Bi-annual audit complete Target of 100% of grievances closed out to satisfaction of complainant within one month	Audit report

9. Training

9.1 Overview

All necessary training is provided as part of induction training (to provide general awareness) and job-specific training as necessary.

9.2 Induction Training

All employees of the Project Company and contractors are required to participate in community relations and human rights training as part of the standard induction programme. This training is designed to help Turkish and foreign workers of the Mersinli WWP Project understand and respect different cultures and points of view and operate effectively as team members, as well as and behave appropriately when they are within local communities.

9.3 Job-Specific Training

Specific training on stakeholder engagement and the application of the Grievance Procedure will be provided to CLO(s) and other personnel and supervisors of the Project Company and Contractors involved in or overseeing activities with local communities.

9.4 Other Training Requirements

Additional specialist training shall be provided to key personnel involved in community and stakeholder engagement on an “as needed” basis.

10. Responsibilities

The Project Company will have an overall responsibility for undertaking and supervising engagement with all stakeholders in relation to the Project and will use available resources to ensure that the relevant activities are conducted effectively and to the appropriate standard.

The construction contractors will be monitored closely in order to comply with the requirements of this SEP. They will report to the Project Company on a regular basis with regards to engagement activities and grievances submitted to them directly.

To implement effective engagement activities, The Project Company has already employed a Community Liaison Officer (CLO). The CLO is responsible for maintaining relations with the local stakeholders, coordinating the disclosure of Project information, public consultation activities and the management of Grievance Procedure described in Section 5.3.

11. Contact Information for the Public

Alcazar Energy Turkey Office

Address: Kanyon Ofis Binasi, Kat: 6
Büyükdere cad. No: 185
34394 Istanbul, Turkey

Telephone: +90 (212) 319 7659

E-mail: mersinli_gorus@alcazarenergy.com

CLO: Bulent Kostem

Appendix A Summary of Previous Stakeholder Engagement Activities

1. Stakeholder Engagement

The stakeholder engagement activities for the Mersinli Wind Power Plant (WPP) Project were started by the former Project Owner in the scope of the national Environmental Impact Assessment (EIA) process conducted in line with the then-current Turkish EIA Regulation. Alcazar Energy acquired the Project Company ("Yander Elektrik") established by previous developer of the Project to implement Mersinli WPP in May 2017. As the Project Company is committed to communicating openly and actively with workers, communities and governmental and non-governmental organisations on all topics under its Environmental and Social Sustainability Policy, The Project Company has started conducting stakeholder engagement activities in line with its corporate standards in the period following the Project's acquisition. A Community Liaison Officer (CLO), who will be specifically responsible for maintaining the stakeholder activities, was appointed by the Project Company in November 2017. Information on the stakeholder engagement activities conducted to date is provided in the following sections. A stand-alone Stakeholder Engagement Plan (SEP) has also been developed for the Mersinli WPP Project in line with the requirements and standards of the EBRD and IFC in order to ensure that strong, constructive, and responsive relationships are built with Project's stakeholders, which is a key for successful implementation of the Project.

In line with the definitions of international standards, the Project Company recognizes a stakeholder as any individual, organization or group that is potentially affected by the Project or that has an interest in the Project and its impacts. The purpose of stakeholder identification is to determine and prioritize Project stakeholders for consultation that may be affected (either directly or indirectly in positive or negative way) by the Project or that have an interest in the Project but are not necessarily directly impacted by the Project. As part of the stakeholder identification process, it is also important to identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status. Within the scope of the SEP developed as part of the ESIA process, key Project stakeholders have been identified and given in the Plan (see Chapter 4 – Stakeholder Identification) in detail.

1.1 Stakeholder Engagement According to National EIA Process

1.1.1 Public Participation Meeting (Çınardibi Neighbourhood)

- Following the national Environmental Impact Assessment (EIA) process conducted in accordance with the then current Turkish EIA Regulation, EIA Positive Decision was issued by the Ministry of Environment and Urbanization (MoEU) for the Mersinli WPP Project in July 2016. This EIA Positive Decision was based on the national EIA Report, which was prepared in consideration of the Project layout with 22 turbines (55 MWe).
- The Final EIA Report (dated April 2016) and the associated EIA Positive Decision issued by the Ministry of Environment and Urbanization (dated July 2016) is based on a different Project layout with 22 turbines (55 MWe). The validity of the existing EIA Positive Decision for the current layout with 17 turbines (55 MWe) was confirmed by the Ministry on 1 November 2017.

In line with the requirements of the Turkish EIA Regulation, a Public Participation Meeting was planned by the local EIA Consultant for the Mersinli WPP Project. The meeting was planned to be held on the 30 July 2015 in Cınardibi neighbourhood of Bayındır district in Izmir province. According to the Turkish EIA Regulation, the meeting location and time was determined in collaboration with the Provincial Directorate of the Ministry of Environment and Urbanization (MoEU). This Public Participation Meeting could not be conducted as planned as the local people did not attend. Afterwards, a second Public Participation Meeting was planned and held on 24 August 2015 with the participation of the Project Company (Yander Elektrik A.S.), the Provincial Directorate of the MoEU, the State Meteorological Service and the local EIA Consultant. It is understood from the meeting photographs that around 10 people attended the second meeting. As mentioned in the EIA Report, the questions of the participants raised during this meeting were responded by the Project Owner.

1.1.2 Correspondence with the Governmental Authorities

In line with the national EIA Regulation, a Review and Evaluation Commission is established by the MoEU General Directorate of EIA, Permitting and Auditing at the scoping stage of the EIA process. This Commission, besides the EIA Consultant and the Project Owner, includes representatives from related governmental agencies and institutes (if deemed necessary depending on the scope and type of the project university representatives, representatives of the relevant research organizations, experts, professional chambers, unions, associations and non-governmental organizations may be asked to participate in the Commission). This Commission is involved in the process at several stages, including scoping and review and evaluation (detailed information on the national EIA process is presented in Chapter 2 in the ESIA Report). Thus, as part of the national EIA process, consultations with the Commission members, as representatives of the governmental institutions relevant to the Project, are conducted through official correspondence or meetings. The Commission established by the MoEU for the Mersinli WPP Project as part of the national EIA process and official views documented within the national EIA Report are summarized in Table 1-1. In addition to the official views provided in the national EIA process, additional correspondence with relevant institutions and service providing companies to obtain their views on the Project are also provided in the table. It should be noted that the previous consultations were done based on the previous Project layout with 22 turbines, however the license area has not changed since the date of consultation and additional consultation are being/will be carried out with any related governmental institution for the new layout as necessary.

Table 1-1. Official Views of Governmental Institutions Given in the Scope of National EIA Process

Governmental Institutions/ Companies	Type of Institution	Date of the Official View	Subject	Summary of the Official View Regarding the Project
Ministry of Environment and Urbanization, General Directorate for Protection of Natural Assets	Central Government	14/07/2015	Project location with respect to legally protected areas	Project Area is not located within the boundaries of any Special Protection Zone.
Ministry of Energy and Natural Resources, General Directorate of Mining Affairs	Central Government	11/02/2016	Impacts on mining activities	Institution approved the content of the EIA Report in consideration of the mining activities and geological-geotechnical conditions.
Ministry of Transport, Maritime and communication, General Directorate of Infrastructural Investments	Central Government	25/08/2014	Infrastructure	There is no survey or project planned by the institution within the Project Area.
Ministry of Culture and Tourism, General Directorate of Investments and Operations	Central Government	28/05/2014	Project location with respect to cultural and tourism sites	Project Area is not located within the boundaries of any designated tourism centre or any area conserved or spared for development of cultural and touristic sites. The Ministry does not plan any future study within the Project Area.
Izmir Governorate, Provincial Directorate of Environment and Urbanization	Local Government	17/02/2016 21/04/2014	Project location with respect to legally protected areas	According to the 1/25,000 scale Environmental Master Plan, Project Area does not correspond to natural protected area. No natural asset is present within the Project Area.
Ministry of Forestry and Water Affairs, General Directorate of Forestry, İzmir Regional Directorate	Local Government	11/01/2016	Impact on forestlands	Project shall be located at a distance of minimum 400 m from the Karlik Watching Tower. Project is located at 1 st Degree Fire Sensitive Area. Sufficient number of firefighting equipment and personnel (as specified in the official view) has to be kept ready on-site
İzmir Greater Municipality	Local Government	07/03/2016	Impact on water resources Impact on existing infrastructure	There are several river beds located within the License Area. Excavated materials shall not be disposed of at river beds and measures shall be taken at the storage sites to prevent transportation of materials to the river beds. İZSU (Water and Wastewater Administration of İzmir Metropolitan Municipality) and 2 nd Regional Directorate of State Hydraulic Works (DSİ) shall be informed about any engineering structure (e.g. bridge, culvert, etc.) to be planned for the crossing of rivers. İZSU (Water and Wastewater Administration of İzmir Metropolitan Municipality) shall be contacted to identify existing above or underground structures before execution of any excavation, drilling, etc. study to be conducted at the Project Area to avoid any damage on the wastewater and storm water lines or existing infrastructure.
		06/10/2015	Water resources	Drinking water well and the package wastewater treatment plant located in Dernekli neighbourhood shall be protected from all physical and construction works planned in the scope of the Project.
Bayındır Municipality	Local Government	04/11/2015	Zoning plan	There is no approved 1/5,000 or 1/1,000 scaled zoning plan for the Project Area.
Kemalpaşa Municipality	Local Government	26/10/2015	Zoning plan	There is no approved 1/5,000 or 1/1,000 scaled zoning plan for the Project Area. Project Area is marked as "Forest Area" on the 1/100,000 scale İzmir-Manisa Planning Zone Environmental Master Plan.

Governmental Institutions/ Companies	Type of Institution	Date of the Official View	Subject	Summary of the Official View Regarding the Project
Torbalı Municipality	Local Government	21/10/2015	Zoning plan	There is no approved 1/5,000 or 1/1,000 scaled zoning plan for the Project Area.
Ministry of Culture and Tourism, General Directorate of Cultural Assets and Museums	Local Government	20/04/2016	Project location with respect to cultural heritage sites Protection of cultural heritage sites	Project Area is not located within any protected cultural heritage site or protection area. There is a cultural heritage site proposed for registration. No activity shall be conducted at this area until the registration is completed. In case any cultural heritage is encountered during the studies, works shall be ceased immediately and the local authorities or the closest Museum Directorate shall be informed in accordance with the relevant law.
Ministry of Forestry and Water Affairs, General Directorate of Meteorology	Central Government	29/04/2014	Minimum interference distance to meteorology radars	Wind turbines have to be installed at a distance of minimum 20 km from the meteorology radars.
Ministry of National Defence, İzmir Regional Directorate for Construction Real Estate	Local Government	09/04/2014	Project location with respect to military zones	There is no military zone, prohibited military or security zones (except the General Command of Gendarmerie and Command of Coast Guard) within the planned Project Area.
İzmir Governorate, Provincial Directorate of Food, Agriculture and Livestock	Local Government	26/08/2014 06/10/2015	Land use	Since the Project Area is located on forest lands that under the scope of Forestry Law, there is no requirement to be fulfilled by the Directorate in the scope of Law on Soil Protection and Land Use.
TEİAŞ	Turkish Electricity Transmission Company	09/04/2014	Existing infrastructure	Electricity Transmission Line (154 kV) of Fuat WPP Corresponds to the Project Area. On the other hand, the Company approves the implementation of the Mersinli WPP Project.
BOTAŞ İzmir Directorate	Petroleum Pipeline Corporation	27/03/2014	Existing infrastructure	There are no above or underground infrastructure facilities within the boundaries or in the surroundings of the Project Area.
İZMİRGAZ	Natural Gas Distribution Company	25/03/2014	Existing infrastructure	There is no infrastructure facility in the Project Area. Following the development of zoning plan, infrastructure design projects will be prepared along the roads. The Company shall be informed about the implementation of new plans.
GEDİZ İzmir Provincial Directorate	Electricity Distribution Company	10/03/2014	Existing infrastructure	There are no low or high voltage transmission lines affecting the turbine locations. This official letter is valid for two years. In case new electricity lines are installed at the area, the Directorate has to be consulted.

Source: Final EIA Report, April 2016.

1.1.3 Stakeholder Concerns Identified in the Lawsuit Petition Challenging National EIA Report

Once the Project obtained an EIA Positive Decision from the MoEU in July 2016, Marmariç Ecological Life Association and several individuals including some of the residents of the Marmariç Permaculture Village, filed a lawsuit against the Ministry for its decision in the same month (July 2016) requesting the cancellation of the EIA Positive Decision. A first instance court interim decision was taken in September 2016 that allowed Yander Elektrik to become an intervener, an experts site visit report was issued in November 2016 and the first instance court final decision (rejecting claims) was given in June 2017. The claimants appealed first instance decision in June 2017 asking for injunction. The Council of State then issued an interim appeal court decision in August 2017 which rejected the plaintiffs' claim for suspension of execution and decided not to suspend the EIA Positive Decision until the final decision is made. The final decision was issued by the court in January 2018, rejecting the appeal request of the plaintiffs and closing the court case against the EIA Positive Decision issued for the Project.

Concerns of the stakeholders that were the basis of the court case are summarized in Table 1-2, where the last column shows the chapter/section of the ESIA Report addressing the relevant environmental and/or social subjects.

Table 1-2. Stakeholder Concerns Identified in the Lawsuit Petition

Subject	Stakeholder Concerns Raised	ESIA Section Addressing the Concern/Issue
Project Alternatives (Location and Technology)	Lack of alternatives assessment	Chapter 4 ("Project Alternatives")
Lack of Assessments and Mitigation	What units other than turbines will be built, what are their construction phase impacts? Impacts of the ETL and the access roads are not addressed (especially in terms of habitat loss) Impacts of underground cable network not addressed (especially in terms of habitat loss, underground impacts and H&S) Impacts of other Project units (substation, administrative building additional roads, etc.) not addressed (especially in terms of habitat loss).	Chapter 3 ("Project Description")
ETL EIA Process	Lack of impact assessments	Chapter 3 ("Project Description") Chapter 6 ("Landuse, Soils and Geology") Chapter 15 ("Community Health and Safety")
Forest Areas	General Loss Value of trees to be cut down in terms of climate change Habitat Fragmentation Sustainability Potential increase in erosion and landslide risk due to tree cutting	Chapter 6 ("Landuse, Soils and Geology") Chapter 11 ("Biodiversity")
Greenhouse Gas Emissions (GHGs)	Lack of GHG impact assessments more detailed in appeal, with references to international conventions, agreements, etc. Discussed as "value of trees to be cut down in terms of climate change" (see Forest Areas above)	Chapter 8 ("Air Quality and GHGs")
Biodiversity	Objectivity of the existing ecosystem assessment reports regarding flora/fauna assessments Not mentioning some of the endemic plant species in the Project area Project area to be located on a bird migration route. Lack of assessment regarding Bayindir-Ovacik-Arpadag Wildlife Development Area which is 11 km to the Project Area	Chapter 11 ("Biodiversity")

Subject	Stakeholder Concerns Raised	ESIA Section Addressing the Concern/Issue
Project Area	<p>"The claim that the Project Area is moved away from forest areas, privately owned lands and agricultural areas is not consistent with real site data"</p> <p>"Distance estimations given in the EIA are wrong, not up to standards and the assessments in this regard, concerning agricultural areas, pasture areas and rural settlements are not sufficient and against the law"</p>	<p>Chapter 3 ("Project Description")</p> <p>Chapter 6 ("Landuse, Soils and Geology")</p> <p>Chapter 15 ("Community Health and Safety")</p> <p>Chapter 4 ("Project Alternatives")</p>
Excavation	Insufficiency of assessments/calculations on excavations/earthworks during construction phase	<p>Chapter 6 ("Landuse, Soils and Geology")</p> <p>Chapter 8 ("Air Quality and GHGs")</p>
Dust	Insufficiency of assessments/calculations on dust emissions during construction phase	Chapter 8 ("Air Quality and GHGs")
Noise	Insufficiency of assessments/calculations on noise impact during construction phase	Chapter 7 ("Noise")
Electromagnetic and Infrasound	<p>The appeal states that "electromagnetic impacts not assessed since the EIA deemed the assessment unnecessary due to the fact that "no proven impacts" exist (no scientific data exists regarding electromagnetic impacts and this is what the EIA states, following a review of related literature).</p> <p>Stakeholders claim that an assessment and preventive measures based on this assessment are required.</p> <p>Insufficiency of assessments/calculations on electromagnetic and infrasound impacts to be sourced both from the turbines and from the ETL</p>	Chapter 15 ("Community Health and Safety")
Water Resources	General lack of environmental assessment on Uladı Dam Reservoir, Mersinli Drinking Water Well, package WWTP interaction	Chapter 9 ("Water and Wastewater")
Fire Risk	Mitigation regarding fire risk is incompliant with the legislation	Chapter 15 ("Community Health and Safety")
Cumulative Impacts	<p>Cumulative impact assessment only covers impacts in terms of energy generation (no assessment regarding environment, habitats and community H&S)</p> <p>Project units other than turbines not included in the cumulative impact assessment</p> <p>ETL of FuatRES coincides with Mersinli WPP Project area and this proves that no other plant in the area was included in the assessments</p>	Chapter 17 ("Cumulative Impact Assessment")
Cumulative impacts	"Existence of Fuatres and Karabel WPPs are not considered as a factor during site selection and CIA is against the law"	
Environmental Cost-Benefit Analysis/ Forest Areas	There is no cost-benefit analysis in terms of the "value of forest habitats" and "the value of the development".	Chapter 11 ("Biodiversity")
Environmental Cost-Benefit Analysis	"The Environmental Cost-Benefit Analysis is insufficient and does not meet the requirements of EIA process.	Chapter 4 ("Project Alternatives")
Public Participation	"The EIA Positive decision is against public participation principle"	Chapter 18 ("Stakeholder Engagement (stand-alone "Stakeholder Engagement Plan")
Public Interest	"The EIA Positive decision is against public interest"	Chapter 13 ("Socio-economic Environment")

Source: Lawsuit Petition.

1.2 Stakeholder Engagement in the scope of ESIA Process

1.2.1 Public Consultation Meetings

As part of the Environmental and Social Impact Assessment (ESIA) studies conducted by the ESIA Consultant two Public Consultation Meetings (PCMs or Scoping Meetings) have been planned, one in Cumali neighbourhood and the other in Cinardibi neighbourhood. The Public Consultation (Scoping) Meeting in Cumali neighbourhood was conducted on 4 October 2017, while the Cinardibi meeting has been rescheduled to take place during the ESIA disclosure period in consideration of the feedback received during the consultations conducted with the neighbourhood headman and the local community.

In the selection of the meeting locations, face to face meetings were initially conducted by Project Company with the headmen of the neighbourhoods located in the vicinity of the Mersinli WPP's electricity generation license area. In consultation with the neighbourhood headmen, except the headmen of Cinardibi, the Cumali neighbourhood has been identified as a central settlement to which residents of the surrounding settlements can access to attend the meeting. On the other hand, Cinardibi neighbourhood, with a population of 822 that is formed of Pomaks⁵, is both demographically and socio-economically different from other local settlements. Thus, a separate future meeting is planned specifically for Cinardibi neighbourhood, which is intended to be held within the ESIA disclosure period.

1.2.1.1 Scoping Meeting at Cumali Neighbourhood

For the Public Consultation Meeting held in Cumali neighbourhood, following communications done with the neighbourhood headmen, announcements were posted 10 days before the meeting date in Cumali, Dagtekk, Dernekli, Karakizlar and Karaot neighbourhoods at public places such as offices of the headmen, teahouses or mosques to inform the local people about the meeting venue, date and time as well as the purpose of the meeting (see Figure 1-1). In addition, official letters were sent to relevant local administrations and representatives of local communities were invited through individual communication (see Appendix H in the ESIA Report). Table 1-3 summarizes the methods used to inform stakeholders about the PCM.

A Neighbourhood teahouse was selected as the meeting venue in Cumali neighbourhood as this place, which is commonly used by locals, has proper capacity and physical conditions for a public consultation meeting. A shuttle bus was provided by Project Company to transfer interested parties/local people to the meeting location from surrounding settlements.

The Scoping Meeting was held with the participation of representatives of the Project Company (representatives from Dubai and Turkey offices including technical and environmental project managers) and the Independent ESIA Consultant (AECOM). AECOM acted as the moderator of the meeting. The meeting started with an explanation of the purpose and scope of the meeting and followed by a presentation given by AECOM. Following the presentation, questions, concerns and suggestions of the participants were received one by one. The presentation template used during the PCMs is provided in Appendix I in the ESIA Report. The main topics covered in the presentation were as follows:

- What is the Mersinli WPP Project?
- Who is the Project Owner?
- What are the anticipated benefits of the Project?
- What is the Environmental and Social Impact Assessment process?
- Stakeholder Engagement: How to Participate in the Process?
- Questions and Answers Session

⁵ Pomaks in Turkey refers to an ethnic group, who migrated from Bulgaria to Turkey, speak their own dialect of Bulgarian and are predominantly Muslim.



Figure 1-1. Announcements Posted at the Neighbourhoods

Table 1-3. Methods Used to Inform Stakeholders about the Public Consultation Meeting

Stakeholder Group	Type of Stakeholder	Information Method
Izmir Governorate, Provincial Directorate of Environment and Urbanization	Governmental	Official Letter
Izmir Governorate, Provincial Directorate of Food, Agricul. and Livestock	Governmental	Official Letter
Izmir Governorate, Provincial Directorate of Culture and Tourism	Governmental	Official Letter
Bayindir District Governorate	Governmental	Official Letter
Bayindir Municipality	Governmental	Official Letter
Kemalpasa District Governorate	Governmental	Official Letter
Kemalpasa Municipality	Governmental	Official Letter
Torbali District Governorate	Governmental	Official Letter
Torbali Municipality	Governmental	Official Letter
Izmir Regional Directorate of Forestry	Governmental	Official Letter
Cumali Neighbourhood Headman Office	Local Community	Official Letter, Individual Meeting
Karakizlar Neighbourhood Headman Office	Local Community	Official Letter, Individual Meeting
Karaot Neighbourhood Headman Office	Local Community	Official Letter, Individual Meeting
Yesilkoy Neighbourhood Headman Office	Local Community	Official Letter, Individual Meeting
Project Affected People in Cinardibi Neighbourhood	Local Community	Individual Meeting
Marmaric Permaculture Village	Local Community	Individual Meeting

A large-scale map (in A0 format), showing the Mersinli WPP's license area and the turbine locations, was posted on the wall of the teahouse during the meeting (see Figure 1-2). Comment/suggestion forms in Turkish (see Appendix J in the ESIA Report for English translation) were available to ensure that any party who would prefer to submit opinions in written would have this opportunity. However, no additional feedback was provided, thus no revisions were made in ESIA.



Figure 1-2. Map of the Project Area Posted at the Meeting Venue

The number of people attending the meeting was around 30. Even though the announcements were posted at public places that could be seen by all community members including women and the neighbourhood headmen were informed that participation of all interested parties including women is expected by the Project Company, no women participated in the meeting possibly due to cultural boundaries/norms. Participants were from the Cumali and Yesilkoy neighbourhoods. The headman of the Cumali neighbourhood also attended. A list of participants was kept for the participants who preferred to document their attendance (see Appendix K in the ESIA Report); 23 local people signed the list). Photographs taken during the meetings are presented in Figure 1-3 to Figure 1-6.



Figure 1-3. Participants of the Meeting



Figure 1-4. Presentation Given by ESIA Consultant



Figure 1-5. Questions and Answers Session (Question by Local People)



Figure 1-6. Questions and Answers Session (Project Company Addressing Questions)

The questions, issues, concerns and suggestions raised by the participants during the meeting, which are noted in Table 1-4 in details, were focused on the following main subjects:

- Benefits of the Project to the local people
- Locations of the turbines and access roads
- Potential environmental impacts (i.e. noise, dust)
- Impacts due to traffic
- Access restrictions

Table 1-4. Questions/Issues/Concerns/Suggestions Raised During the Meeting

No	Party who Raised the Question/Issues/Concern/Suggestion	Subject	Description of the Question/Issues/Concern/Suggestion	Response of the Project Owner/ESIA Consultant	ESIA Section Addressing the Concern/Issue
1.	Headman of Cumali Neighbourhood	Project benefits	1.1. What will be the benefits of the Project to Cumali neighbourhood?	Information on the employment opportunities to be provided and goods and services to be procured by the Project was given by Project Company and the ESIA Consultant.	Chapter 13 (Socio-economic Environment)
			1.2. Would the neighbourhood benefit from the electricity to be produced?	State policy and procedures under the existing laws and regulations were explained to clarify that Project Company will not have the authority to provide electricity to local settlements.	Chapter 13 (Socio-economic Environment)
			1.3. Would it be possible to pave certain roads with asphalt?	Project Company explained that the improvement works to be done on forest roads are under the authority of the Forestry Directorate and the authorities generally allow only road	Chapter 3 (Project Description)

No	Party who Raised the Question/Issues/Concern/Suggestion	Subject	Description of the Question/Issues/Concern/Suggestion	Response of the Project Owner/ESIA Consultant	ESIA Section Addressing the Concern/Issue
				widening and do not lean towards asphalt paving. On the other hand, the request was noted for consideration during future discussions with Forestry Authorities and development of community development projects.	
2.	Resident of Yesilkoy neighbour hood (Herder)	Safety risks	2.1. The resident reported that he has a herd of goats. He has concerns about the safety risks that may posed by Project components on the animals.	Project Company explained that the transformers will be inside the turbines thus no risk (i.e. electrocution) will be posed by Project on animals. Additionally, it was informed that this design will allow that there will be no fences that may cause access restrictions for the herders.	Chapter 15 (Community Health and Safety)
		Impacts due to traffic	2.2. The resident requested runways to be placed on the access roads to be constructed in order to ensure that he can keep his herd out of the way whenever it is necessary.	Project Company stated that feasibility of this suggestion would be considered in the design. ESIA Consultant explained that a Traffic Management Plan would be developed and implemented in the scope of the Project.	- Chapter 15 (Community Health and Safety)
3.	Resident of Cumali Neighbour hood	Noise impact	3.1. Will the Project cause noise impact?	ESIA Consultant explained that the turbines will cause noise generation at the source, which will decrease as it propagates. Information was provided on the computer-based noise modelling studies to be conducted as part of the ESIA and explained that the report will identify the distances where turbine noise would reduce under regulatory limit values.	Chapter 7 (Noise)
			3.2. Concern was raised regarding the dust to be caused during construction works, which may affect the beekeeping activities.	It was explained that computer based dust modelling studies will be conducted to assess potential dust impact of the Project. Socio-economic surveys will be conducted to identify any potential beekeeping activities that may be affected by the construction works.	Chapter 8 (Air Quality and GHG Emissions)
4.	Resident of Cumali Neighbour hood	Employment opportunities	4.1. Information was requested on the timeline and procedure for job applications.	Project Company provided information on the Project's current status (i.e. completion of required permits before start of construction) and explained that the Project would start accepting job applications in 2018 Q1/Q2. It was mentioned that the local people would be kept informed about Project's timeline and upcoming employment opportunities through information of neighbourhood headmen and other applicable methods.	Chapter 13 (Socio-economic Environment) Stakeholder Engagement Plan (standalone)
5.	Resident of	Employment	5.1. Resident provided	Project Company explained their preference for local employment and	Chapter 13 (Socio-economic Environment)

No	Party who Raised the Question/Issues/Concern/Suggestion	Subject	Description of the Question/Issues/Concern/Suggestion	Response of the Project Owner/ESIA Consultant	ESIA Section Addressing the Concern/Issue
	Yesilkoy Neighbourhood	opportunities	information about his son (who is a mining engineer having expertise in health and safety and working in another province) and asked if there would be opportunities for him in this Project.	procurement opportunities to ensure social integration of the Project and reduce associated costs. Importance of availability of skilled persons in the local community was emphasized and information on the timeline and general procedure for future job applications was provided one more time.	
6.	Resident of Cumali Neighbourhood	Project location	6.1. Information was requested regarding the proximity of the Project to local settlements.	ESIA Consultant showed the location of the turbines and other Project units on the large scale map layout map posted on the wall of the meeting venue. Distance of nearby neighbourhoods, and especially Cumali neighbourhood, to turbines was explained on the map.	Chapter 3 (Project Description)
		Project Owner	6.2. Information was requested on the structure of Project Company (i.e. relationship with the state)	Project Company explained the structure Project Management, by explaining that the company is private and there is no relationship between the company and the state.	Chapter 3 (Project Description)

The meeting lasted approximately 1 hour. After responding to all the questions and concerns of the participants, it was confirmed that there were no remaining issues and the meeting was closed. Following the meeting, questions and concerns of the participants were continued to be responded through one-to-one conversations in and outside the meeting venue.

1.2.2 Meetings with Marmariç Permaculture Village Community

The Marmariç Permaculture Village, located in Mersinli Locality of Dernekli neighbourhood in Bayındır, İzmir, is the closest settlement to the Mersinli WPP Project Area. The closest building to Project Area is located around 1 km southeast of Turbine-17.

The first members of the community moved to Mersinli Locality, which was a hamlet of the Dernekli neighbourhood that was abandoned more than 20 years ago, in 2003 with the aim of establishing and maintaining a sustainable ecological settlement based on permaculture principles, which would be an example in Turkey and allow sharing experiences among interested parties. To support the community in liaising and cooperating with public and private institutions whenever necessary to achieve its aims, a legal entity, Marmariç Ecological Life Association, was founded in 2005. In 2010, Marmariç Village started hosting the Permaculture Research Institute of Turkey for providing trainings to interested parties. Currently, there are 8 houses located in the village that are inhabited by 14 community members.

Marmariç Permaculture Village Community has been identified as a key stakeholder group at the scoping phase of the ESIA. The Marmariç Ecological Life Association together with several individuals including some of the residents of the Marmariç Permaculture Village filed a lawsuit against the Ministry of Environment and Urbanization for its EIA decision in July 2016, requesting to cancel the existing EIA Positive Decision (dated July 2016) issued for the Mersinli WPP Project. Concerns stated in the court petition were concentrated on the environmental aspects and assessments (such as alternatives assessment; description and assessment of

Project and/or associated facilities including access roads, cabling system, substation, administrative building; baseline characterization and assessment of impacts on forests and biodiversity, greenhouse gas assessment, assessment of potential dust emissions, noise, infrasound and electromagnetic impacts; cumulative impact assessment) that have not been covered within the national EIA Report, which was prepared and approved in accordance with the then-current Turkish EIA Regulation. By the decision of the court, the case was concluded in January 2018, in favour of the Ministry. In addition, residential houses and agricultural lands of the settlement are located within the boundaries of Project's Electricity Generation License Area, which has raised concerns among the community regarding urgent expropriation⁶ right of the Project in accordance with Article 27 of national Expropriation Law.

Having been identified as a key stakeholder group, consultations with Marmariç Permaculture Village Community started early in the ESIA process. Since July 2017, several stakeholder meetings have been conducted in the scope of ESIA with the community and their representatives as listed in Table 1-5.

Table 1-5. Stakeholder Meetings Conducted by ESIA Consultant with Marmariç Permaculture Village Community and their Representatives

Stakeholder Type/Group Consulted	Date	Location	Purpose of the Meeting	Attendees
Representative of Marmariç Village Community	13 July 2017	İstanbul	Initial meeting to introduce changes in the Project and Project Owner; consultation regarding the major concerns of the community and proper stakeholder engagement strategy to be developed for Marmariç Permaculture Village.	Alcazar Energy Senior Management (Dubai) Alcazar Energy Turkey to represent Project Company AECOM Turkey (ESIA Consultant)
Marmariç Village Community Members	28 July 2017	İzmir (Marmariç Village)	Introduction with community members; presentation of the changes in the Project and Project Owner and consultation regarding the environmental and social concerns of the community.	Alcazar Energy Senior Management (Dubai) Alcazar Energy Turkey to represent Project Company AECOM Turkey (ESIA Consultant)
Marmariç Village Community Members	3 October 2017	İzmir (Marmariç Village)	Invitation to the Public Consultation (Scoping) meeting to be held in Cumali neighbourhood on 4 October, 2017; informing the community member regarding the scope and methodology of the ESIA studies in details with a focus on the requirements of international environmental and social standards/guidelines (noise, visual, electromagnetics, dust, social, etc.).	Alcazar Energy Senior Management, Technical Team, Project Environmental Specialist (Dubai) Alcazar Energy Turkey to represent Project Company AECOM Turkey (ESIA Consultant)

During the meetings held with the Marmariç Permaculture Village Community, it was identified that the previous Project Owner also communicated with them regarding the Project. With the acquisition of the Project Company, a constructive and transparent consultation process has been initiated. During the meetings conducted to date, the environmental and social concerns and expectations raised by the community members have been noted in Table 1-6.

⁶ Article 27 of the Expropriation Law, states that; for the expropriation of immovable properties in situations for which Minister of Councils takes decision regarding the need or urgency for national defense in the scope of the implementation of the Law on National Defense Obligations (Law No: 3634) or during emergencies foreseen by special laws, the immovable property subject to expropriation may be seized by the related administration on condition that the procedures other than valuation shall be completed afterwards. In this process, following the request of the related administration, compensation amount for the immovable property shall be appraised by the court within 7 days through the experts assigned as per Article 10 and 15 of the Expropriation Law. Seizure shall only be made following the invitation to be done in accordance with Article 10 and the amount is deposited to the bank specified in the announcement.

Table 1-6. Concerns, Questions and Expectations Raised by Marmariç Permaculture Village Community during the Meetings

Main Environmental and Social Subject	Concern/Questions/Expectation
Project Design	Possibility of increase in turbine numbers and installed capacity of the WPP
Visual Impacts	Distance of the turbines and their visibility from the Marmariç Permaculture Village and residential houses
Transportation	Location of access roads to be used for transportation during construction phase
Socio-economic conditions	Impact of potential dust generation on agricultural activities (i.e. cherry orchards and gardens)
	Potential conflict of Project personnel with local communities
	Physiological stress on local communities (especially for women) due to presence of construction camps
	Potential impact of the Project on livestock activities
Biodiversity	Potential impact of the Project on fauna components (i.e. mammals)
	Loss of trees due to Project will be relatively limited in comparison to deforestation activities conducted by Forestry authorities in the scope of relevant Forestry Management Plans
	Concerns regarding the baseline flora and fauna data contained in the national EIA Report
Community Health and Safety	Impact of potential dust and noise generation on local communities located in the proximity of construction access roads due to earthworks and transportation
	Noise impact potential of turbines on the village
	Electromagnetic impact potential of the WPP on the village
	Shadow-flicker impact potential of the WPP on the village
Cumulative Impacts	Potential visual impacts in case of capacity extension of existing projects (i.e. Fuat WPP)
	Impact of the wind turbines on climatic conditions due to airflow that would be caused by multiple WPPs with significant numbers of turbines
Land Acquisition	Concerns for loss of lands located within Project's License Area through urgent expropriation; community has an expectation for a commitment for avoidance of expropriation of lands within the License Area for any Project facility including turbines, access roads, administrative building, etc.
	Possibility of change of license borders

In addition to the consultations done by the ESIA Consultant, the Project Company, through the CLO and other Company officials, conducted several meetings and conversations with the Marmariç Permaculture Village Community between November 2017 and February 2018 to understand their concerns about the Project and developed measures to properly address them wherever technically and administratively possible. As a result of this process, the following have remained as the key concerns/issues that are to be addressed by the Project Company:

- Lands of the community that are located within the License Area boundary and thus may be expropriated or affected by the Project (due to planned activities or future capacity increase)
- Noise impact due to construction and operation activities
- Potential change in electromagnetic impacts standards
- Tree cutting

Through the process, the Project Company considered the concerns of the community and committed to address them in line with proper administrative and technical processes. The following measures were committed to be taken and the community was informed about these measures during the meetings conducted and also in written:

- Ensure that the agricultural activities of the community (on the parcels located within the License Area) are not affected by the Project in cooperation with the related governmental institutions where necessary
- Inform the community regarding any tree cutting activities
- Inform the community about all the monitoring activities and their results,

Additionally, the following mitigation measures will be taken by the Project Company to address the concerns and mitigated potential impacts associated with biodiversity, visual amenity and environmental noise:

- Implement Biodiversity Action Plan
- Sign Reforestation Protocol with the Forestry Authorities
- Implement Reforestation Programme
- Conduct construction activities at the work sites located closest to the noise sensitive receptors only during day time
- Optimise turbine operation in consideration of wind speed to avoid noise becoming unacceptable
- Implement Noise Management Plan
- Implement the Stakeholder Engagement Plan to collect complaints and suggestions through the grievance mechanism to be established
- Conduct noise monitoring programme to verify compliance with regulatory limits and Project standards
- Use underground cable system.

Consultation with the Marmariç Permaculture Community will be continued on an ongoing basis through the Project.

Within the process, specific engagement activities will be designed by the Project Company to ensure that all the relevant issues/concerns have been properly addressed and where possible resolved. Duration and frequency of these activities will be decided on the base of mutual agreements.

1.2.3 Consultations with Key Informants

In October 2017, key informant meetings were conducted by the social expert of the ESIA Consultant with the neighbourhood headmen of the Çınardibi, Dernekli, Cumalı, Dereköy, Gökyaka, Yeşilköy, Dağteke, Helvacı, Karakızlar, Karaot and Ormanköy, which are the settlements located within a 5 km radius around the Project Area. The main aim of these consultations was to collect information on the local socio-economic conditions of the settlements, to have some insight about the perception and expectations of the settlements consulted to outline future stakeholder engagement activities and community development strategies. The outcome of the consultations is presented in Chapter 13 of the ESIA Report.

1.2.4 Consultations with Project Affected Persons (PAPs)

As previously identified within the ESIA, cherry plantation activities have been conducted on registered forest lands (2 different parcels registered with lot/parcel numbers 277/1 and 277/2) by informal users at the location of Turbine-12. Several consultations have been conducted with the land users by the Project Company as well as ESIA Consultant to understand the ownership status of the corresponding parcels, identify affected persons (land users) and their socio-economic conditions, significance of impacts to be caused by land acquisition and the potential mitigation alternatives that may be developed for the restoration of livelihoods. The findings of the socio-economic surveys conducted by the ESIA Consultant are provided in Chapter 13 of the ESIA Report.

As part of ESIA consultations, a meeting was conducted with one of the Project Affected Persons (PAPs), who lives in Çınardibi neighbourhood and reportedly use one of the two affected forest parcels for cherry plantation activities, on 3 October 2017 at the Çınardibi teahouse (see Figure 1-7).

In order to identify the actual owners of the cherry plantation, additional site visit held on 20-22 December 2017. During the site visit, all PAP's were interviewed and actual borders of the plots (depending on the illegal ownership) were identified.

1.2.5 Consultations with the District Governmental Offices and Local Associations

Additional meeting was planned and held with the District Directorate of Agriculture of Kemalpaşa and Bayındır districts on 20-22 December 2017. During the meetings, baseline information on agriculture and livestock activities that have been carrying out in the region was obtained. On the other hand, governmental officials were also informed about the potential environmental and social impacts of the proposed Project. A large-scale map (in A3 format), showing the Mersinli WPP's license area and the turbine locations, was presented during the meeting and potential environmental and social risks were discussed with the officials. Concerns and comments of the governmental officials that addressed during the meetings are summarized in Table 1-7 below:



Figure 1-7. View from the Meeting with PAPs in Çınardibi Neighbourhood (3 October 2017)

Table 1-7. Concerns and Comments Raised by Governmental Officials during the Meetings**Main Environmental Concern/Comments and Social Subject**

Livelihood Impact	<p>Beekeeping activity is one of the important livelihoods for some households in the region. Impact of potential dust generation could affect these livelihoods. Relevant mitigation measures should be taken during the construction phase of the Project</p> <p>It should be noted that, previous WPP Projects within the region have not observable adverse impacts on beekeeping so far.</p>
Restriction of Access	Grazing activities within the region should be also taken into account during the establishment of Project specific mitigation measures.
Stakeholder Notification	Beekeepers must apply to the District Directorate of Agriculture while deciding to situate their beehives. So, Directorate should be informed on locations of the upcoming Project construction activities in order to notify the beekeepers.
Community Development	<p>In order to increase Project benefits, following community development projects were offered by the officials:</p> <p>Provide training for beekeepers;</p> <p>Encouraging people living in the project affected settlements to establish organizations such as agriculture and livestock cooperatives; and</p> <p>Employment opportunities should be available during the construction phase of the Project.</p>

Additional meetings were held with the Izmir General Directorate of National Estate. During the meeting, possible livelihood restoration and compensation strategies can be developed during the construction phase of the Project were discussed.

Apart from abovementioned meetings, additional interview was held with the board member of Izmir Beekeepers Association (an Agricultural Engineer with MSc degree). Potential impacts of the Project on beekeeping activities and possible community development activities were discussed with the board member. Following issues were emphasized by the board member during the meeting:

- Relevant mitigation measures should be taken during the construction activities such as dust suppression;
- Beekeepers should be informed in timely manner on the location of the upcoming Project construction activities;
- Queen bees can be provided to the beekeepers by the Project Company at the beginning of the season; and
- Specific flowers (such as lavender) can be planted at certain areas where beekeepers situate their hives.

1.3 Grievance Mechanism for Stakeholders

Information regarding the procedure and channels (e.g. phone, e-mail address, and website) that can be used to lodge grievances will be provided in all nearby settlements within the Project Impact Area and on the Project Company website. A Public Grievance Form, which will be used to receive a grievance, is provided, in Appendix C in SEP. Once the Grievance Form is received, a Grievance Register Form will be filled by the CLO.

The Project Company has already employed a CLO, who will also be responsible for the management of potential grievances and for the Grievance Procedure. Each complaint whether from an individual, entity or a community will be considered. A response to each specific complaint will be communicated to the party that raised it (complainant). A formal procedure will be used to log the key information provided by a complainant and to record any related incoming communications. A record of actions taken and resolutions agreed as a result of the grievance investigation will also be documented. Once the grievance will be resolved in agreed with the complainant, a grievance close-out form (see Appendix E in SEP) will be filled by the CLO. Monitoring of the necessary actions that need to be taken will be carried out by the responsible party. A sample leaflet on how to report a grievance is presented in Appendix E in SEP.

The Project Company aims to establish a formalized procedure, ensuring that it is responsive to any concerns and complaints from affected stakeholders and communities. Where training is necessary for the staff involved in the management of the grievance mechanism, The Project Company will ensure that such training is provided in a timely manner.

The implementation of the Grievance Procedure by the Project Company for the Project will be under the day to day responsibility of the formally designated CLO. Grievance boxes will be placed by the Project Company (main entrance), at the neighbourhood headmen's offices in selected settlements (e.g. Cumalı and Çınardibi) to facilitate collection of grievances.

If the complainant is not satisfied with the solutions proposed and implemented by the Project Company to address the raised comment or grievance, the complainant is free to seek other mediation or legal remedies in accordance with Turkish law.

The grievance procedure will also cover employee and non-employee grievances. Internal grievances will be handled by the Project Company's HR Department. Employee suggestion boxes will be available at the construction camp sites and grievance mechanism for workers will be relying on following aspects:

- Transparency
- Impartiality
- Confidentiality
- Accessibility

Appendix B Stakeholder List

Level	Category	Organisation/Entity	Contact Details
Internal	Personnel	Project Personnel	N/A
	Subcontractors	(TBD)	(TBD)
National	National Government and Relevant Ministries	Ministry of Environment and Urbanisation	Address: Mustafa Kemal Mahallesi Eskisehir Devlet Yolu 9. km. No: 278 Cankaya / ANKARA Telephone: +90 312 410 1000 E-mail: cevresesehircilikbakanligi@hs01.kep.tr
		Ministry of Energy and Natural Resources	Address: Turkocagi Cad. No:2 Pk: 06100 Cankaya/ANKARA Telephone: +90 312 212 6420
		Turkish Electricity Transmission Corporation (TEIAS)	Address: Nasuh Akar Mah. Turkocagi Cad. No:12 Balgat/ANKARA Telephone: +90 312 222 8160
		Electricity Generation Company (EUAS)	Address: Nasuh Akar Mah. Turkocagi Cad. No:2/F-1 Pk: 06520 Cankaya/ANKARA Telephone: +90 312 212 6900 E-mail: basinhalk@euas.gov.tr
		General Directorate of Renewable Energy	Address: Eskisehir yolu 7. km No:166 Pk:06520 Cankaya/ANKARA Telephone: +90 312 295 5000 E-mail: info@yegm.gov.tr
		Ministry of Forestry and Water Affairs	Address: Bestepe Mah. Alparslan Turkes Cad. No: 71 - Yenimahalle/ANKARA Telephone: +90 312 207 5000
		Ministry of Transportation, Maritime Affairs and Communications	Address: Hakki Turaylic Cad. No: 5 Pk: 06338, Emek Cankaya/ANKARA Telephone: +90 312 203 1000
		Ministry of Food, Agriculture and Livestock	Address: Universiteler Mah. Dumlupinar Bulvarı No: 161 Pk:06800 Cankaya/ANKARA Telephone: +90 312 287 3360
		Ministry of Labour and Social Security	Address: Emek Mahallesi, 17. Cadde No:13 Pk: 06520 Çankaya / ANKARA Telephone: +90 312 296 6000
		Turkish Employment Agency	Address: Emniyet Mah. Mevlana Bulv. No:42, Yenimahalle/ANKARA Telephone: +90 312 216 3000

Level	Category	Organisation/Entity	Contact Details
	Non-governmental Organisations (NGO's)	Environment Foundation of Turkey	Address: Tunali Hilmi Cad. No:50/20 Pk: 06660, Cankaya/ANKARA Telephone: +90 (312) 425 55 08 E-mail: cevre@cevre.org.tr
		WWF Turkey	Address: Buyuk Postane Cad. No: 19 Kat: 5 Pk:34420 Bahcekapi Fatih/ISTANBUL Telephone: +90 212 528 2030 E-mail: info@wwf.org.tr
		Turkish Wind Energy Association (TUREB)	Address: Kizilirmak Mah. 1443 cad. No:22/16 06520 Cukurambar/ANKARA Telephone: +90 312 474 0274 E-mail: info@tureb.com.tr
		Clean Energy Foundation (TEMEV)	Address: Defne Sokak 18/1 Pk: 06540 Asagi Ayranci/ANKARA Telephone: +90 312 468 0309 E-mail: temev@temev.org.tr
		Energy and Environment Foundation (ENDER)	Address: Oguzlar Mah. Suleyman Haciabdullahoglu Cd. 1397 Sok. No:14, Balgat Cankaya/ANKARA Telephone: +90 312 443 6337
		İzmir Branch Office of Union of Chambers of Turkish Engineers and Architects (TMMOB)	Address: Tepekule Kongre Sergi ve Is Merkezi Anadolu cad. No: 40 Kat:2 Bayrakli/İZMİR Telephone: +90 232 462 3333 E-mail: izmir@mmo.org.tr
		Federation of Turkish Women Associations	Address: Akay Cad. No: 15/2 Kucukesat/ANKARA Telephone: +90 (312) 417 2604
Local	Government Agencies / Local Administrations	İzmir Metropolitan Municipality	Address: Cumhuriyet Bulvarı No:1 Konak/ İZMİR Telephone: +90 232 293 1200 E-mail: him@izmir.bel.tr
		Governorship of İzmir	Address: Hukümet Konagi Konak/İZMİR Telephone: +90 232 455 8282 E-mail: izmir@icisleri.gov.tr
		İzmir Provincial Directorate of Environment and Urbanisation	Address: Anadolu Caddesi No:41/5 Pk:35010 Bayrakli/İZMİR Telephone: +90 232 341 6800 E-mail: izmircevrevesehirclilik@hs01kep.tr
		Bayındır Municipality	Address: Mithatpasa Mah. Atatürk Cad. No:32 Pk: 35840 Bayındır/İZMİR Telephone: +90 232 581 5000

Level	Category	Organisation/Entity	Contact Details
		District Governorship of Bayindir	Address: Mithatpasa Mah. Ataturk Cad. No:32 Pk: 35840 Bayindir/IZMIR Telephone: +90 232 581 4001 E-mail: bayindir@icisleri.gov.tr
		Kemalpasa Municipality	Address: Mehmet Akif Ersoy Mah. İsmet İnönü Cad No : 111 Kemalpasa/IZMIR Telephone: +90 232 988 1111 E-mail: info@izmir-kemalpasa.bel.tr
		District Governorship of Kemalpasa	Address: Mehmet Akif Ersoy Mah. Atatürk Bulvarı No: 27 Pk: 35730 Telephone: +90 232 878 1294 E-mail: kemalpasa@icisleri.gov.tr
		Torbalı Municipality	Address: Tepekoy Mahallesi, Ataturk Meydanı, No: 1 Torbalı/IZMIR Telephone: +90 232 856 6666
		District Governorship of Torbalı	Address: Ertugtul Mah. Mithatpasa Cad. No:69 Hukümet Konagi Torbalı/IZMIR Telephone: +90 232 856 1010 E-mail: torbali@icisleri.gov.tr
		Headmen of Çınardibi	N/A
		Headmen of Cumalı	N/A
		Headmen of Dağtekk	N/A
		Headmen of Dereköy	N/A
		Headmen of Dernekli	N/A
		Headmen of Gokyaka	N/A
		Headmen of Helvacı	N/A
		Headmen of Karakızlar	N/A
		Headmen of Karaot	N/A
		Headmen of Ormankoy	N/A
		Headmen of Yesilkoy	N/A
	Non-governmental Organisations/ Cooperatives	İzmir Society for the Protection of Nature and Animals (IZCEV)	Address: 847 sok. No:8 Büyük Beyler İshani Kat:2 Daire:209 Konak/IZMIR Telephone: +90 232 425 7535 E-mail: izmircevre@gmail.com

Level	Category	Organisation/Entity	Contact Details
		Association of Business Women in İzmir	Address: Sair Esref Bulvarı Güneş Apt. No:80 K:5 D:14 Alsancak- Konak / İzmir Telephone: +90 232 483 8353 E-mail: info@izikad.org
		İzmir Industry and Business Association	Address: Sair Esref Bulvarı No: 27/2 Huzur Ishani Montro Meydani Cankaya/İZMİR Telephone: +90 232 422 3242 E-mail: kurumsal@izsiad.org.tr
		Bayındır Chamber of Merchants and Craftsman	Address: Camii Mah. Kestane Pazarı Sok. 9 Bayındır/İZMİR Telephone: +90 232 581 7231
		Kemalpasa Chamber of Merchants and Craftsman	Address: Atatürk Mah. Atatürk Blv. 12 Nif Psj. D:3 Kemalpasa/İZMİR Telephone: +90 232 878 2178
		Torbali Chamber of Merchants and Craftsman	Address: Tepekoy Mah. Kazım Dirik Cad. 21 D:201 Torbali/İZMİR Telephone: +90 232 856 4090
		Bayındır Chamber of Agriculture	Address: Fatih Mah. Onat Cad. 4 Bayındır/İZMİR Telephone: +90 232 581 3158
		Kemalpasa Chamber of Agriculture	Address: Mehmet Akif Ersoy Mah. Stadyum Cad. 48/A Kemalpasa/İZMİR Telephone: +90 232 878 1047
		Torbali Chamber of Agriculture	Address: Tepekoy Mah. 4550 Sok Torbali/İZMİR Telephone: +90 232 856 9768
	Universities	İzmir Ege University	Address: Ege Üniversitesi Kampusu Pk:35100 Bornova/İZMİR Telephone: +90 232 311 1010 E-mail: webadmin@ege.edu.tr
		İzmir 9 Eylül University	Address: Cumhuriyet Bulvarı No: 144 Pk:35210 Alsancak/İZMİR Telephone: +90 232 412 1212 E-mail: dokuzeyluluniversitesi@hs01.kep.tr
		İzmir University of Economics	Address: Sakarya Cad. No: 156 Pk: 35330 Balcova/İZMİR Telephone: 0 (232) 279 25 25 E-mail: helpdesk@ieu.edu.tr
	Business	Business premises located around the immediate vicinity	N/A
		Beehive owners within the Project Aol	N/A

Appendix C Grievance Form

GENERAL	
Project	
Case #	
Complainant full Name	
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: <i>(Please provide mailing address)</i> _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail: _____
IDENTIFICATION OF THE CONCERN / INCIDENT / GRIEVANCE	
Description of Concern / Incident / Grievance What is your grievance? What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Concern / Incident / Grievance	<input type="checkbox"/> One-time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
RESOLUTION PROPOSAL	
What would you like to see happen to resolve the problem?	
Date: _____ Please return this form to: • Bulent Kostem mersinli_gorus@alcazarenergy.com Tel: +90 530 417 7550	

Appendix D Grievance Close-out Form

GRIEVANCE CLOSE-OUT FORM	
Close-out Inspection	
Close-out Date	__ __/__ __/ 20__ __
Case #	
Assessment of Grievance/Suggestion	
Action Taken	
List of Documents that verify the Action	
Date of Action	__ __/__ __/ 20__ __
Inspector Official	Full Name _____ Signature _____
Assessment of Monitoring	
Necessity of Monitoring	<input type="checkbox"/> "Necessary" <input type="checkbox"/> Not Necessary
Duration of Monitoring	
Responsible Party	
Date Completed	__ __/__ __/ 20__ __
Results of Monitoring	

Signature of Complainant (if willing)	<hr/>
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Appendix E Leaflet on How to Report a Grievance

We welcome any comments or any other enquiries on the commitments within this document or the project in general. Also, we are committed to an open and fully formalised approach to management of any grievances in relation to the project. We consider this to be essential to understand, respond and effectively resolve issues of stakeholder concern.

A summary of our procedure for handling project grievances is:

You are welcome to report any concerns, grievances or other comments to use in writing, by email or in person at our offices.

We will take full details of these concerns expressed and ensure that our designated point of contact is made fully aware of the communication so that a formal assessment will commence. We will record the date and contact information on the grievance on our standard form and place a copy in our project grievance register.

Alternatively, we can provide our form which can also be used to report your concern.

Completion of this form will ensure we have all information necessary to effectively conduct our investigation. This form can be completed anonymously if necessary.

We will ensure one of these is completed for all grievances on the project and these will be placed on the project grievance register.

You are welcome to propose to us what you would like to happen in response to the issue.

We will undertake an investigation to assess what corrective and preventive action, or further investigation, is necessary as part of our investigation.

We will respond to you within 30 days and place details of our completed corrective and preventive actions within the Grievance register. If a longer term programme is required to provide an adequate solution then this programme will be detailed on the register against the specific grievance.

Overall, grievances will be registered and will include all grievances, whether received in writing or verbally. The complainant will receive an acknowledgement of the receipt of the complaint within a reasonable timeframe, this will be completed in writing.

HOW TO REPORT A GRIEVANCE

Project Company has many ways of receiving your grievances. You can:

- Fill out the attached Public Grievance Form and send it to the address on the form, or drop it off with a Community Liaison Officer (CLO) or at one of the designated places (e.g. grievance boxes);
- Contact one of the Community Liaison Officers (CLO) in person or on the phone to lodge a verbal grievance (Phone: +90 530 417 7550). The CLO will then fill out a form for you to ensure that your grievance is tracked; or
- Communicate a grievance through e-mailing to mersinli_gorus@alcazarenergy.com
- Post it to: Kanyon Ofis Binasi, Kat: 6 Buyukdere cad. No: 185 34394 Istanbul

RECORDING

The CLO will record the grievance received by using a standards log (template provided below):

Date of Grievance Received	Grievance Holder	Subject of Grievance	Description of Grievance	Response Measure	Closure Remark

FOLLOW UP

Project Company will take the following steps to deal with your concern.

- When the Project Company receives your grievance form, or are notified verbally of your grievance, the CLO will investigate it;
- The Project Company will investigate your grievance and may need to contact you when doing so. When the investigation is completed, the Project Company will inform you about the findings and propose a solution within 30 days after submission of your grievance.
- If you are not happy with the investigation or the response provided, the Project Company will discuss with you other options to address your concern.

CONFIDENTIALITY AND ANONYMITY

1. Individuals who submit their comments or grievances have the right to request confidentiality. If it is not possible for Project Company to resolve the grievance without revealing your identity, the Project Company will contact you to ask how you would prefer to address this situation.
2. If you wish to raise a grievance anonymously you may do so, the Project Company will investigate the grievance. However, in this case the Project Company will not be able to contact you to discuss the results of investigation and proposed mitigation measures. The Project Company will only be able to provide a general response on its website
3. At all times, complainants can seek legal remedies in accordance with the Turkish laws and regulations.

