



Günaydın Solar Power Plant Project

Environmental and Social Due
Diligence

PREPARED FOR



Kavram Enerji Yatırım Üretim ve
Ticaret A.Ş.

DATE
August, 2024

REFERENCE
0710697



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Günaydın Solar Power Plant Project

Environmental and Social Due Diligence

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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AoI	Area of Influence

BMP	Biodiversity Management Plan
Client	Kavram Enerji Yatırım Üretim ve Ticaret A.Ş. a subsidiary of Fiba Yenilenebilir Enerji Holding A.Ş.
CHA	Critical Habitat Assessment
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
ESP	Environmental and Social Policy
FI	Financial Intermediaries
GHG	Greenhouse gas
HS	Health and Safety
ILO	International Labour Organization
LRP	Livelihood Restoration Plan
PAP	Project Affected Person
PBF	Priority Biodiversity Features
PRs	Performance Requirements
RAP	Resettlement Action Plan
SCMS	Supply Chain Management System
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SLIP	Supplementary Information Package
SPP	Solar Power Plant
UN	United Nations
WPP	Wind Power Plant

EXECUTIVE SUMMARY

Kavram Enerji Yatırım Üretim ve Ticaret A.Ş. ("Kavram" or "the Client"), a subsidiary of Fiba Yenilenebilir Enerji Holding A.Ş. ("Fiba") is in the stages of planning the development and operation of the Günaydın Solar Power Plant ("SPP" or "the Project") situated in Balıkesir Province, Türkiye.

This hybrid project is designed with a total installed capacity of 19.98 MWm / 19.98 Mwe and is located adjacent to the existing Günaydın Wind Power Plant ("WPP") operated by the Client.

Zhejiang Orient Engineering Co., Ltd. has been appointed by the Client as the Engineering, Procurement, and Construction (EPC) Contractor, while JA Solar Turkey and OEM Manufacture (HSA) are designated as the primary panel suppliers by the EPC.

For financing, the Client aims to pursue a Project Finance structure involving the European Bank for Reconstruction and Development (EBRD). Compliance with the EBRD Environmental and Social Policy, 2019 and EBRD Performance Requirements (PRs) is mandatory for projects receiving funding from the EBRD.

To adhere to EBRD PRs, the Client engaged Environmental Resources Management (ERM) to conduct an Environmental and Social Due Diligence (ESDD), including a Supply Chain Due Diligence study for the Project. This aims to identify key environmental and social (E&S) sensitivities and ensure the Project's alignment with the EBRD PRs.

ERM's ESDD has revealed some key E&S findings and identified gaps as presented below, leading to the preparation of the Project Environmental and Social Action Plan (ESAP). ESAP outlines further actions to be undertaken by responsible parties, including timelines and indicators of completion.

In response to the ESAP, the Client has appointed ERM to support the fulfillment of identified gaps. ERM will conduct additional studies to address these gaps, and the findings will be presented in a standalone Supplementary Lenders Information Package (SLIP).

THE KEY FINDINGS

- **Environmental and Social Impact Assessment (ESIA):** The Project has an Environmental Impact Assessment (EIA) in place in line with Turkish EIA law. However, Turkish EIA law does not include requirements for the completion of a baseline data collection and social impact assessment. This is one of the key gaps against EBRD PR 1 since PR 1 requires an assessment of the Project's potential environmental and social impacts (including associated facilities) by using a comprehensive baseline data.

To fill this gap, ERM has been appointed by the Client in February 2024 to collect the missing environmental, biodiversity and social baseline data to assess the potential impacts of the Project.

- **Stakeholder Engagement:** Although the Client has disclosed the EIA to the public as per Turkish EIA law, other preliminary engagement, or consultations with stakeholders, especially Project Affected Persons (PAPs) has not been conducted up to date. This is a key gap as EBRD PR10 requires meaningful engagement with affected persons and stakeholders as early on as possible.

An updated SEP and comprehensive Grievance Mechanism (GM) (including workforce and community grievance mechanisms) is currently under development and will include the findings from the social baseline and social impact assessment.

The following elements of the SEP must be updated following the completion of the social baseline, SIA, engagement efforts, and adjusting the organizational capacities of those responsible for managing the Project's social performance:

- Stakeholder Identification, Mapping and Analysis;
- SEP Roles and Responsibilities;
- Stakeholder Engagement Action Plan; and
- Timelines.

- **Land Acquisition and Resettlement:** The Client has followed Turkish requirements and laws regarding land acquisition and resettlement for the Project and has achieved the Public Best Interest Decision from the authorities to proceed with land expropriation.

During ERM's site visit in October 2023 stakeholders from GES3 and GES4 already shared concerns for their loss of livelihoods and land areas for cattle grazing. Engagements with stakeholders must also take place to develop a de facto understanding of their perception of the socio-economic impacts.

The Client shall carry out further assessments of the land use, livelihoods, and assess the potential for resettlement of displacement – whether it is economic or physically, and indirect or direct – in line with EBRD PR5. Based on Turkish law it appears there will be no displacement, however, based EBRD PR5 it does appear that there will be need for the livelihood restoration.

A Livelihood Restoration Plan (LRP) will be developed following the Livelihood Restoration Process happening in 2024. The Client was engaged with ERM to conduct field survey for livelihood restoration plan.

- **Supply Chain Management:** As part of the due diligence a human rights risk assessment connected to the Project's solar supply chain was commissioned. The assessment concluded that, due to the lack of evidence of effective management systems by EPC Contractor and Primary Supplier, the exposure to human rights risk in the supply chain remains.

The Client currently has no organizational capacity to manage social risks in the supply chain and no systematic supply chain management system (SCMS) is in place to identify, mitigate and remediate human rights risks and impacts in the supply chain.

Some policies and procedures for managing supply chain risks are in place and have recently been updated and/or developed. The Client shall adopt and implement an effective SCMS to identify and manage potential adverse impacts in the Project's solar supply chain, including those related to labour conditions.

- **Project Monitoring and Reporting:** The Client should adopt a project specific Environmental and Social Management System including sub E&S management plans, procedures.

Project documents do not include plans for monitoring and reporting of the environmental and social risks and impacts and their management over the Project's lifetime or monitoring and reporting measures for physical, biodiversity and social components including stakeholder engagement activities.

1. INTRODUCTION

1.1 BACKGROUND AND OBJECTIVES

Kavram Enerji Yatırım Üretim ve Ticaret A.Ş. ("Kavram" or "the Client"), a subsidiary of Fiba Yenilenebilir Enerji Holding A.Ş. ("Fiba") is in the stages of planning the development and operation of the Günaydın Solar Power Plant ("SPP" or "the Project") situated in Balıkesir Province, Türkiye.

This hybrid project is designed with a total installed capacity of 19.98 MWm / 19.98 Mwe and is located adjacent to the existing Günaydın Wind Power Plant ("WPP") operated by the Client.

Zhejiang Orient Engineering Co., Ltd. has been appointed by the Client as the Engineering, Procurement, and Construction (EPC) Contractor, while JA Solar Turkey and OEM Manufacture (HSA) are designated as the primary panel suppliers by the EPC.

For financing, the Client aims to pursue a Project Finance structure involving the European Bank for Reconstruction and Development (EBRD). Compliance with the EBRD Environmental and Social Policy, 2019 and EBRD Performance Requirements (PRs) is mandatory for projects receiving funding from the EBRD.

To adhere to these requirements, the Client has engaged Environmental Resources Management (ERM) to conduct an Environmental and Social Due Diligence (ESDD), including a Supply Chain Due Diligence study for the Project. This aims to identify key environmental and social (E&S) sensitivities and ensure the Project's alignment with the EBRD PRs.

The ESDD is based on the review of local Environmental Impact Assessment ("EIA") report developed by a local consultant, site visit findings, discussions with Client and review of the other Project documents provided by the Client.

1.2 APPLICABLE STANDARDS

This ESDD is aligned with Turkish national Environmental and Social Regulations, such as the Constitution of the Republic of Türkiye and Regulation on Environmental Impact Assessment, the European Bank of Reconstruction and Development, (EBRD) Environmental and Social Policy, 2019. EBRD Performance Requirements applicable to this review are as follows:

- EBRD PR1: Assessment and Management of Environmental and Social Risks and Impacts;
- EBRD PR2: Labor and Working Conditions;
- EBRD PR3: Resource Efficiency and Pollution Prevention and Control;
- EBRD PR4: Health, Safety, and Security;
- EBRD PR5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- EBRD PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- EBRD PR8: Cultural Heritage;
- EBRD PR10: Information Disclosure and Stakeholder Engagement;

The following EBRD Performance Requirements are deemed out of scope and not applicable for the Project:

- EBRD PR7: Indigenous People¹;
- EBRD PR9: Financial Intermediaries.

Other relevant standards to consider are:

- International Labour Organization (“ILO”) core conventions pertaining to labor standards and conditions of employment;
- United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs);
- Any international conventions and treaties relating to the environment and social performance that the host country has ratified or is part of;
- EBRD, Supply Chain Management Systems – Solar Supply Chains, Client Guidance; and
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

1.3 ASSESSMENT METHODOLOGY

The methodology utilized in this ESDD report involves assessing the Project's compliance with the relevant standards outlined in section 1.2.

This report is based on the following tasks:

- Kick-off Meeting: this included the overall Project management throughout the entire process, which held in 10.11.2023, to gain an understanding of the Project, confirm the proposed scope of work, time schedule and work team.
- Information review: this included multiple desktop reviews of the E&S documentation produced made available up to 20.11.2023. The documents reviewed are detailed in Appendix A and photos are presented in Appendix B.
- Site visit: a site visit was conducted by ERM on 14.11.2023 with the accompany of Client's Representatives.

The findings have been listed in the following Compliance Summary Table providing a systematic review of the Project's compliance with the EBRD Environmental and Social Policy (ESP), 2019, as defined through the applicable Performance Requirements (PRs).

Based on the compliance review, ERM has prepared the Environmental and Social Action Plan (ESAP) Table. ESAP has been developed to track the the further actions to be taken by responsible parties including timing and indicators of completion and actions were grouped according to relevant EBRD PRs.

To justify the scoring a brief commentary is provided along with actions required by the Client to achieve full compliance with each requirement. These actions will be later on connected with the Environmental and Social Action Plan (ESAP).

¹ PR7 (Indigenous peoples) are not applicable because there are no indigenous peoples in Türkiye per EBRD definition. Additionally, EBRD PR9 which refers to Financial Intermediaries is also not applicable to the Project.

1.4 LIMITATIONS

This ESDD Report has been conducted based on the Kick-off meeting with Client and desktop review of documents provided to ERM by Client. ERM assumes that the data provided is sufficiently complete and accurate for the purpose of this Assignment; ERM was not able to independently verify or corroborate the data provided. The results of the ESDD must be viewed within the scope, timing and resources allotted per the engagement for the Assignment.

Note that this Assessment was neither a full compliance audit nor an impact assessment. Rather, it was an environmental and social screening to identify the potential gaps against applicable standards.

Specific limitations on this assessment are as follows:

- This report is based primarily upon information obtained through cursory reviewed documents provided by Client, interviews, and other publicly available information obtained from the internet. No primary data collection has been undertaken.
- A technical review of Project design and operational performance was not carried out. This assessment was limited to review of outputs and conclusions of technical studies performed by third parties.
- The information provided in this report is not to be construed as legal advice.
- We disclaim any responsibility to the Client and others in respect of any matters outside the scope of the above.
- ERM did not independently verify information provided by Client. Therefore, our findings are accurate and complete only to the extent that information provided to ERM was itself accurate and complete.

2. PROJECT OVERVIEW

2.1 BRIEF PROJECT DESCRIPTION

Günaydın Solar Power Plant Project (hereafter "the Project") has a total installed capacity of 19.98 MWm / 19.98 MWe and is located in Balıkesir Province, Manyas District, Yayla Village. The Project will act as an auxiliary source of the existing 20.75 MWm / 20.00 MWe Günaydın Wind Power Plant Project. In total, the capacity will be 40.73 MWm / 20.00 MWe.

The Project consists of 10 different polygons which are shown in Figure 2-1 below. In the figure, the blue lines represent the license area, T1-T8 represents the existing wind turbines and GES1-GES10 represents the planned solar power plant areas.

The general layout and main access to the Project area is shown in Figure 2-1. Access to the Project will be carried via already existing roads and no new access roads are planned and no access road improvements have been envisaged as part of the Project.

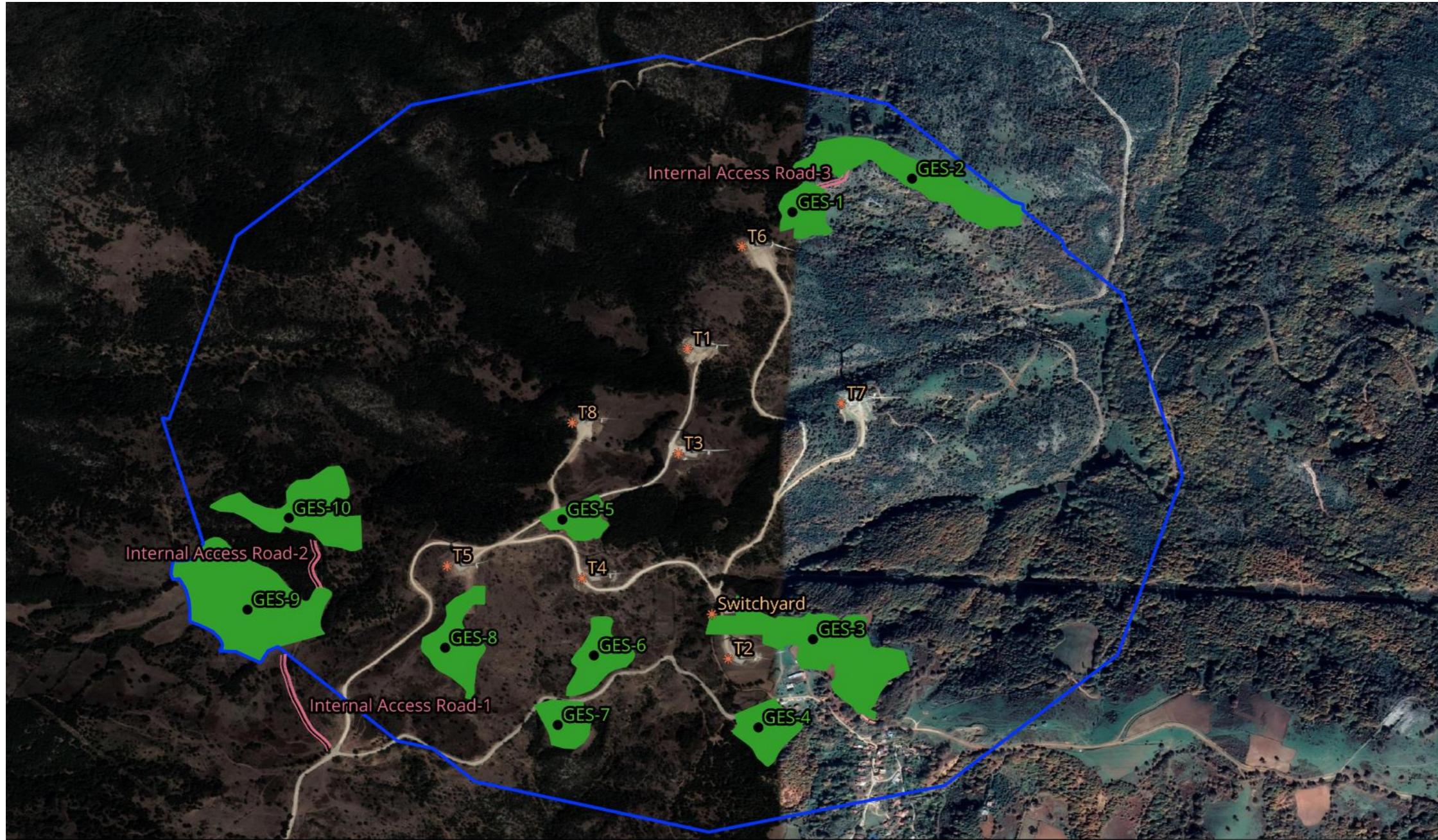
Internal access roads will be designed and constructed inside the Project area. There will be 3 internal access roads with distances of 300 m (between GES9 and existing road), 150 m (between GES9 and GES10) and 70 m (between GES1 and GES2).

There will not be any overhead energy transmission line planned to be established within the scope of the Project. There will only be underground energy transmission lines which will be constructed adjacent to newly planned internal access roads. The lengths of underground energy transmission lines and locations are presented in Table 2-1.

TABLE 2-1 LENGTHS OF ENERGY TRANSMISSION LINE

No	Length (m)	Location
1	300	Between GES9 and existing road
2	150	Between GES9 and GES10
3	70	Between GES1 and GES2

According to the EIA and discussions with Client, the project areas are privately owned. The status of three internal access roads is forestry.



- Legend
- License Area
 - Solar Power Plant Polygons
 - Internal Access Roads
 - * Existing Wind Turbines



Günaydın Solar Power Plant
Project Layout

FIGURE 2-1 PROJECT LAYOUT

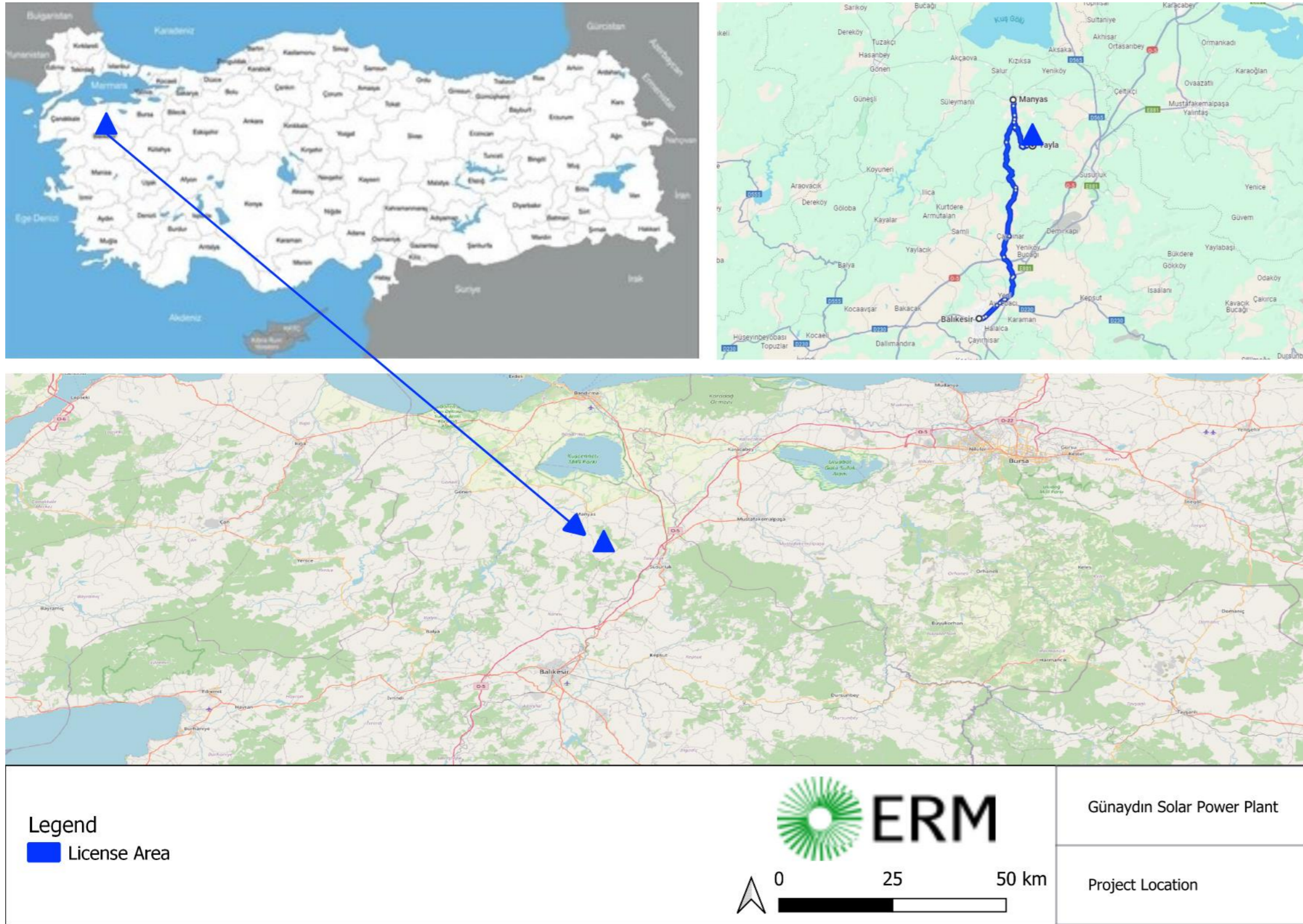


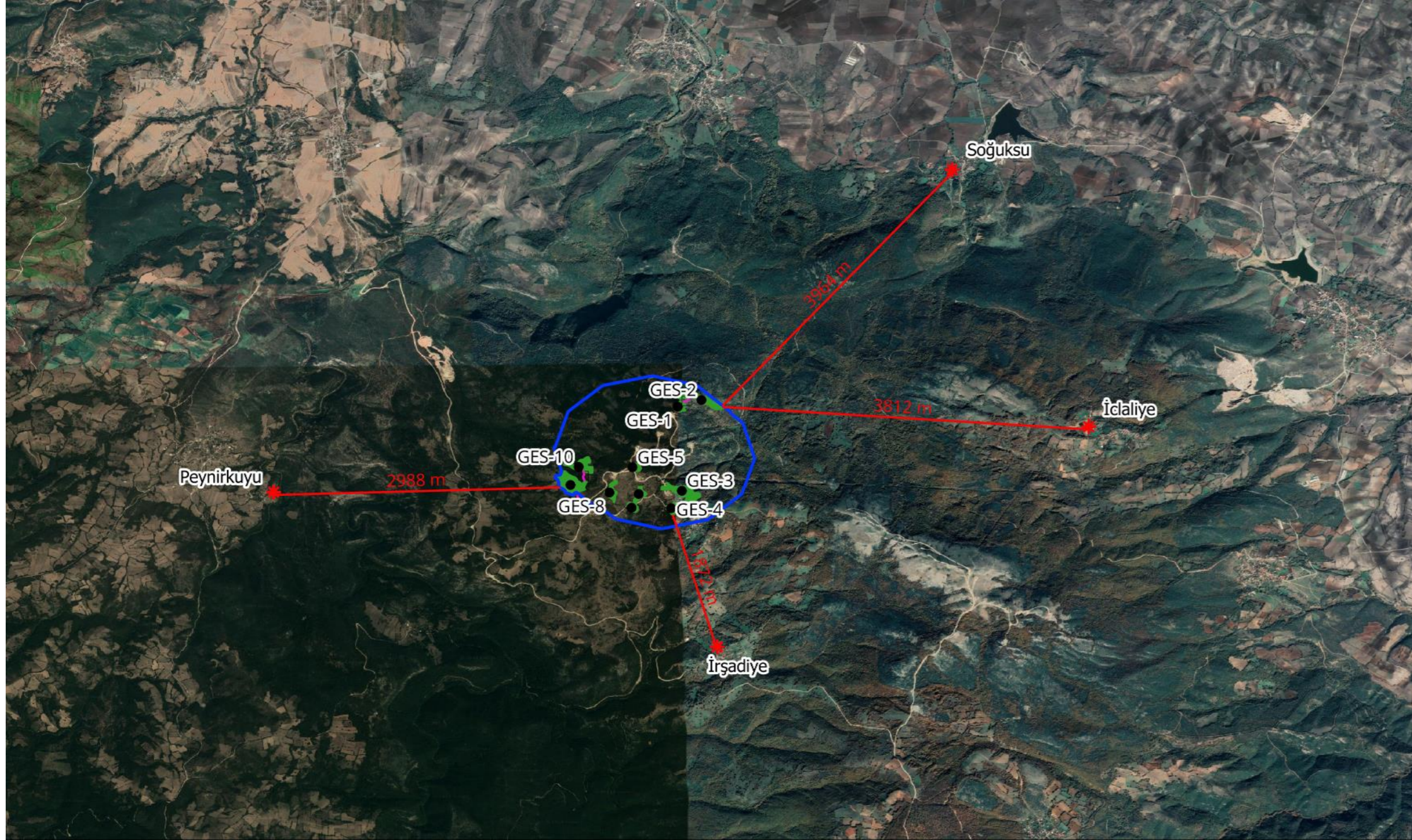
FIGURE 2-2 PROJECT LOCATION MAP

The closest settlements to the Project area is Yayla Village which is about 60 m from the GES-3 and GES-4 polygons and Manyas District which is about 7 km. Nearest settlements of the Project are shown in the Figure 2-3.

A summary of the latest Project schedule provided for review is summarized in Table 2-2. According to the information provided and the site visit conducted within the scope of this Assignment, no construction activities have been started. The construction period of the Project is estimated to be six months and operational period is estimated as 25 years.

TABLE 2-2 PROJECT SCHEDULE

Task	Start Date	End Date
Mobilization	01.03.2024	10.03.2024
CCTV and Lighting	01.05.2024	01.06.2024
Construction	10.03.2024	15.08.2024
Test and commissioning	15.08.2024	31.08.2024



Legend * Nearest Settlements License Area Solar Power Plant Polygons		Günaydın Solar Power Plant
		Nearest Settlements

FIGURE 2-3 NEAREST SETTLEMENTS-1

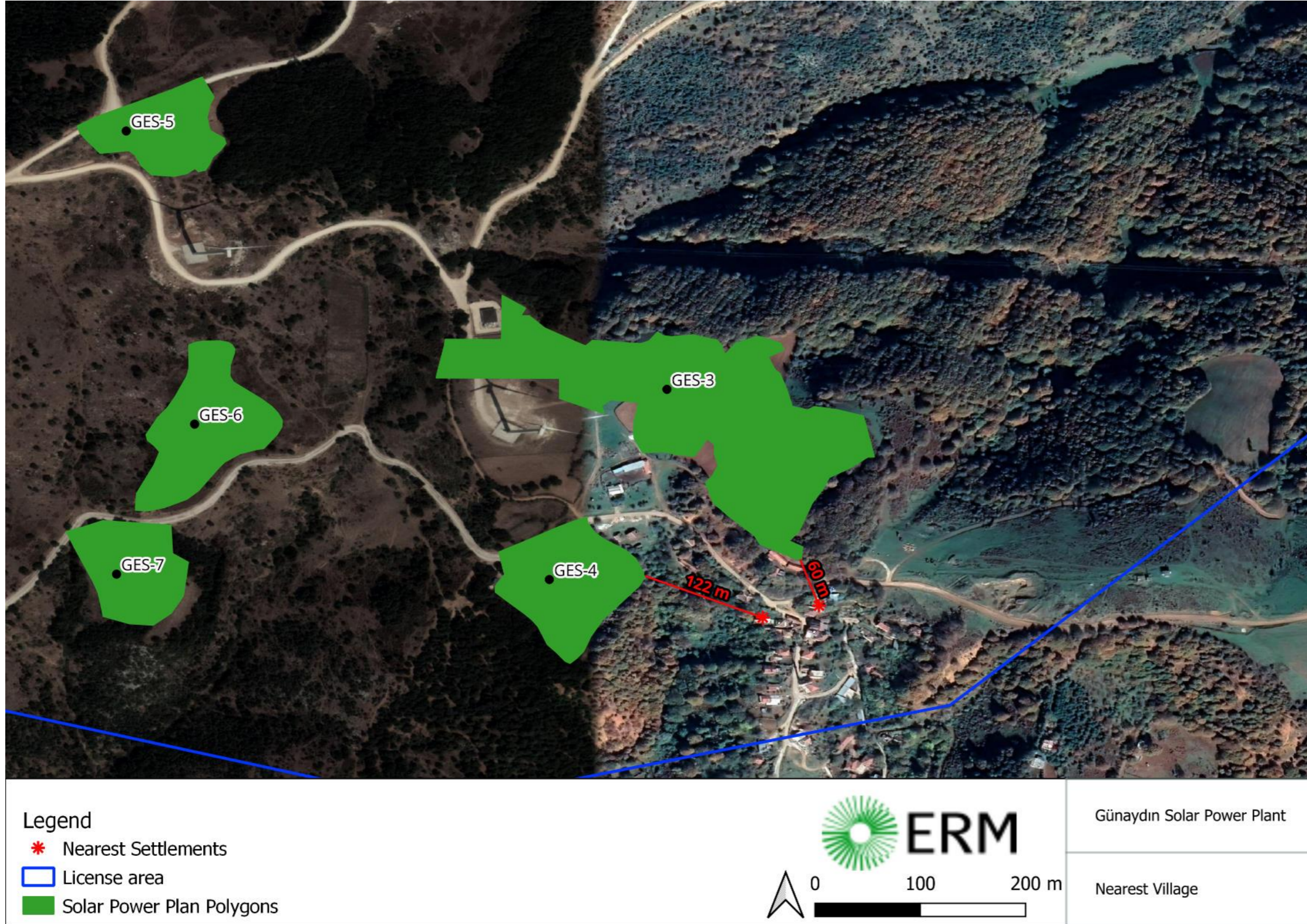


FIGURE 2-4 NEAREST SETTLEMENT-2

2.2 PROJECT PARTIES

An overview of the key Project parties is presented below.

TABLE 2-3 KEY PROJECT PARTIES

Role	Entity
Project Owner	Fiba Yenilenebilir Enerji Holding A.Ş.
Special Purpose Vehicle (SPV)	Kavram Enerji Yatırım Üretim ve Ticaret A.Ş. a subsidiary of Fiba Yenilenebilir Enerji Holding A.Ş.
Engineering, Procurement, and Construction (EPC Contractor)	Zhejiang Orient Engineering Co., Ltd
Primary Panel Supplier	JA Solar Turkey and OEM Manufacture (HSA)

2.3 ASSOCIATED FACILITIES

According to the EBRD definition, Associated Facilities are described as: "*Facilities or activities that are not financed by EBRD as part of the project but which in the view of EBRD are significant in determining the success of the project or in producing agreed project outcomes. These are new facilities or activities: (i) without which the project would not be viable, and (ii) would not be constructed, expanded, carried out or planned to be constructed or carried out if the project did not exist*".

There will not be any overhead energy transmission line, any water pipeline, external access roads and any other facilities planned to be established within the scope of the Project.

2.4 PROJECT PERMITTING STATUS

The main permits and approvals applicable to the Project are given below.

TABLE 2-4 PROJECT PERMITTING STATUS

Topic	Permit	Status
General	License Applications for the Project	Obtained
Land Use	Public Interest Decision	Obtained
	Approval of Expropriation Plan	Obtained
	Expropriation Process	Ongoing
	Permit for the use of Forest Area (access roads)	Ongoing
Construction	EIA Approval	Obtained
	Permits and approvals for roads, water bodies, energy supply lines, utilization of municipal infrastructure etc.	Ongoing
	Construction Permit	Ongoing
Operation	License Application	To be Obtained

Topic	Permit	Status
	Temporary Operating Certificate and Environmental Permit	To be Obtained

2.5 PROJECT CATEGORIZATION

According to the EBRD's Environmental and Social Policy, 2019, each project should be categorized to determine the nature and level of environmental and social investigations, information disclosure and stakeholder engagement required. The approach should be commensurate with the nature, location, sensitivity and scale of the project, and the significance of its potential environmental and social impacts. All projects are divided in three categories:

- Category A: when a project could result in potentially significant environmental and/or social impacts, including direct and cumulative environmental and social impacts, which are new and additional and, at the time of categorisation, cannot readily be identified or assessed. Projects categorised as A require a formalised and participatory environmental and social impact assessment process.
- Category B: when its potential environmental and/or social impacts are typically site-specific, and/or readily identified and addressed through effective mitigation measures. The scope of environmental and social appraisal will be determined by EBRD on a case-by-case basis.
- Category C: when it is likely to have minimal or no potential adverse environmental and/or social impacts.
- Category FI: a project will be categorised as FI if the financing structure involves the provision of funds through Fis.

According to the environmental and social categorization criteria outlined in the relevant standards mentioned above, and following discussions with the potential Lender, analysis of available data, review of the national EIA, and site visits, the Project has been classified as "Category B".

3. ENVIRONMENTAL AND SOCIAL COMPLIANCE REVIEW

The findings have been listed in the following Compliance Summary Table providing a systematic review of the Project's compliance with the EBRD Environmental and Social Policy (ESP), 2019, as defined through the applicable Performance Requirements (PRs).

For all PRs and their associated indicators, the following steps have been followed:

- Decision whether the PR or specific indicator is applicable. If the Project has no significant aspects relevant to PR or the indicator (i.e. no risks), the indicator is scored "**N/A**".
- A general high-level summary of overall compliance with the PR is given.

For all other relevant indicators the scoring is as follows:

EC	<p>Exceeding Compliance (EC): The Project has gone beyond the expectations of EBRD's PR requirements. EBRD should be able to use projects rated EC as a role model for positive Environmental and Social effects.</p>
FC	<p>Fully Compliant (FC): The Project is fully in compliance with EBRD's requirements, and European (EU) and local environmental, health and safety policies and guidelines.</p>
PC	<p>Partial Compliance (PC): The Project is not in full compliance with EBRD's requirements, but has systems, processes or mitigation measure in place which are working towards addressing the deficiencies.</p>
MN	<p>Material Non-compliance (MN): The Project is not in material compliance with EBRD's requirements, and the systems, processes and mitigation measures in place are not working towards addressing the deficiencies.</p>
NOP	<p>No Opinion Possible (NOP): Based on the data provided to date, ERM has not been able to form a definitive position on the subject being discussed.</p>

PR1: Assessment And Management of Environmental Risks and Impacts					
PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
1.1	<i>Environmental and Social Assessment</i>	PC	The EIA does not include a description of the mitigation hierarchy applied for the Project (avoid, minimize, restore, compensate/offset).	Define a mitigation hierarchy for the Project.	1.1 1.4
			A climate change risk assessment was not conducted for the Project. It is expected that the Project will have a positive effect on climate change however potential impacts of the project on climate change need to be considered (for example, GHG emissions during construction) and/or the risks of climate change to the Project.	Complete a climate change risk assessment for the Project.	
			<p>The EIA includes a partial physical environmental baseline, with brief overviews of the surrounding physical environment (climatic conditions, geology, seismicity, hydrology, soils), however the EIA does not include site specific environmental baseline information on:</p> <ul style="list-style-type: none"> • Air quality • Noise • Soil <p>As of February 2024, the environmental baseline collection has been initiated. A comprehensive environmental impact assessment has not been conducted. Some impacts on physical environment are mentioned, however their impact significance has not been evaluated.</p> <p>Appropriate mitigation measures shall be made explicit in the EIA in order to avoid, minimize, or compensate for the potential environmental risks and impacts.</p>	Complete the environmental and social baseline and impact assessment.	

PR1: Assessment And Management of Environmental Risks and Impacts

		<p>PC</p> <p>The EIA includes a partial social baseline, with brief overviews of the surrounding socio-economic environment, however, the information pertains widely to the Balıkesir province rather than the Project study area.</p> <p>A social baseline data collection has been initiated for the Project in February 2024. This includes:</p> <ul style="list-style-type: none"> • Demographic profile of the area; • The local economy and employment; • Livelihoods; • Land Use and land ownership; • Ecosystem services; • Local health, safety and security; • Infrastructure and transportation; • Education; • Recreation and tourism; • Social receptors; • Community cohesion; • Presence of vulnerable groups: and • Potentially affected community and stakeholders <p>A comprehensive social impact assessment has not been conducted. However, ERM was appointed to conduct social impact assessment based on the revised social baseline in February 2024. This will include the identification, assessment and evaluation the potential magnitude and significance of social risks and impacts associated with the Project; both positive and negative, direct and indirect impacts, risks and impacts associated with contractors and cumulative impacts.</p> <p>The updated SIA that will be developed in 2024 will also include a human rights baseline and human rights impact assessment. The SIA will also contain an assessment of the current livelihoods</p>	<p>Complete the social baseline and social impact assessment.</p>	
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PR1: Assessment And Management of Environmental Risks and Impacts					
			<p>and potential resettlement or displacement (voluntary or involuntary).</p> <p>Key issues raised by stakeholders shall also be used to inform the assessment of the Project's social risks and impacts.</p> <p>Appropriate mitigation measures shall be made explicit in the SIA in order to avoid, minimize, or compensate for the potential social risks and impacts. This will include those mitigation measures pertaining to contractor and supplier management.</p>		
1.2	<i>Environmental and Social Management Systems</i>	PC	<p>The Project did not have a project specific environmental and social management system. After completion of preliminary findings phase, preparation of environmental and social management system including sub plans, procedures and policies has been initiated for construction phase.</p> <p>No evidence of an Environmental and Social Management System for operation phase provided.</p>	Please refer to Item 1.4	1.2
1.3	<i>Environmental and Social Policy</i>	FC	<p>The client has a corporate Sustainability Policy detailing their commitments to preserving natural resources and making sure that sustainability is an integral part of their business. This includes:</p> <ul style="list-style-type: none"> • Carrying out all operations in compliance with ethical rules, standards, legal and other requirements • Informing local communities, civil society and all relevant stakeholders about investments, considering the importance of communicating with stakeholders for mitigation of risks and establishing lasting relationships 		

PR1: Assessment And Management of Environmental Risks and Impacts					
			<ul style="list-style-type: none"> • Prioritizing employment of local communities in the regions of operations • Contributing to local development by supporting the regional needs in communication with local citizens of the relevant regions • Raising awareness of both employees and stakeholders in matters such as climate change, sustainability, quality, environment, energy efficiency and occupational health and safety • Acting in accordance with the UN Sustainable Development Goals in determining operations and setting goals • Complying with the 10 principles of the UN Global Compact <p>The Client has corporate Environmental, HR, OHS, Quality, and Supply Chain Policies.</p>		
1.4	<i>Environmental and Social Management Plan (ESMP)</i>	PC	<p>The Project did not have a project specific environmental and social management system. After completion of preliminary findings phase, preparation of environmental and social management system including sub plans, procedures and policies has been initiated for construction phase.</p> <p>No evidence of an Environmental and Social Management System for operation phase provided.</p>	<p>Develop project specific Environmental and Social Management System including sub environmental and social management plans/procedures and policies based on the outcomes and key findings from the E&S assessment (including the EIA and updated physical, biodiversity and social baseline and impact assessment), and stakeholder engagement for construction and operation phases. The E&S management plans will specify a set of actions that will be taken to address the E&S risks and impacts and other measures to improve the Project’s environmental and social performance and those in relation to contractor management.</p> <p>The E&S management plans will also:</p> <ul style="list-style-type: none"> • Reflect the mitigation hierarchy; 	1.2

PR1: Assessment And Management of Environmental Risks and Impacts					
				<ul style="list-style-type: none"> • Include differentiated measures for PAPs and identified vulnerable groups to prevent risks and impacts from disproportionately affecting them and ensure they can reap Project benefits; • Identify opportunities for Project improvement; • Define measurable outcomes with targets and key performance indicators (KPIs) to track the success and efficacy of actions over distinct timelines; • Provide details on roles and responsibilities for implanting the mitigation measures; • And be responsive to Project changes and update as needed. 	
1.5	<i>Organizational Capacity and Commitment</i>	PC	<p>The client should upgrade the organizational structure depicting the internal roles for EHS and social performance management for the Project. This would include an organogram with reporting lines (and any vacant positions) and accompanying details on roles and responsibilities related to the Projects' on-going assessment and management of social risk and impacts. Key social responsibilities should be defined and communicated to stakeholders.</p> <p>The Client has outlined in its procurement procedure the roles and responsibilities related to supply chain management.</p> <p>According to the latest discussions with Client, recruitment process has been initiated to hire the vacancy roles.</p>	<p>Establish an organizational structure for the Project's team including roles and responsibilities related to environmental, health and safety and social performance management. Contractor roles and responsibilities to be defined.</p> <p>The Client shall enhance its organizational capacity to ensure that an effective Supply Chain Management System (SCMS) is implemented and that human rights risks in the supply chain are embedded within decision-making systems, defining accountability and responsibility within the client's organizational structure.</p>	1.5
1.6	<i>Supply Chain Management</i>	PC	No evidence of an effective Supply Chain Management System (SCMS) to address human rights risks in the supply chain was provided.	The client shall adopt and implement an effective SCMS to identify and manage potential	2.4

PR1: Assessment And Management of Environmental Risks and Impacts					
			The Client has Some policies and procedures for managing supply chain risks are in place and have recently been updated and/or developed.	adverse impacts in the Project's solar supply chain (see 2.9 for further information).	
1.7	<i>Project Monitoring and Reporting</i>	MN	Project documents do not include plans for monitoring and reporting of the environmental and social risks and impacts and their management over the Project's lifetime or monitoring and reporting measures for physical, biodiversity and social components including stakeholder engagement activities.	<p>Develop monitoring and reporting protocols for the Project as part of the abovementioned E&S management plans, including roles and responsibilities, frequency and KPI's.</p> <p>Monitoring results shall be well documented, including identification of any necessary preventative or corrective measures in corresponding management plans. These measures shall be implemented, documented, reported, and followed-up on to ensure efficacy.</p> <p>The senior management at Client is responsible for conducting and/or overseeing performance reviews of the Project's ESMS periodically to evaluate efficacy of set objectives, KPIs, procedures etc.</p>	General
1.8	<i>Permitting</i>	PC	It is likely uncertain how the Client monitors the entire validity of its permits, ensures adherence to the stipulated requirements within each permit, and assesses the Project's compliance with these specifications. ERM has been apprised that the management of permits falls under various departments within the Client's organization, including sustainability, environmental, and legal teams.	<p>ERM advises that the overall status of these permits and their corresponding requirements should be collectively understood and overseen by the entire sustainability team.</p> <p>All permits and approvals that have been obtained and will be obtained should be changed to the name of Kavram Enerji Yatırım Üretim ve Ticaret A.Ş.</p>	1.3

PR2: Labour and Working Conditions					
PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
2.1	<i>Human Resource Policies and Working Relationships</i>	PC	<p>The Client has general company policies and principles on their website related to labour and working conditions. There are also Working groups including the Working Group on Employee Satisfaction which monitors the results produced by respective units and progress towards targets, identify emerging needs and inform the Sustainability Committee. This includes tracking employee satisfaction, access training needs, identify awareness-raising activities, monitor quality and inclusiveness of processes, tracking female-male employees, and identify number and content of grievances related to the violation of the Code of Ethics.</p> <p>The Human Resources Policy (including the Human Rights policy) encompasses all employees of Client as well as the candidate talents, who may, in the future, work within the organization thereof. It details the Client's commitments, including:</p> <ul style="list-style-type: none"> • Fulfill the rights of all our employees in full compliance with applicable legislation • creating safe working conditions in accordance with the Labour Law, Occupational Health and Safety guidelines and the Social Security Act; • Fulfill and follow the requirements under the law on protection of personal data 	<p>Develop the following policies and procedures tailored to the labour and working conditions of this specific Project:</p> <ul style="list-style-type: none"> • Code of Conduct and Ethics for employees and construction workers (including expected behavior and prohibited actions); • Labour Procurement Strategy; • A Human Resources Policy (including provisions related to gender, sexual harassment, discrimination, and diversity and inclusion etc.), provisions for migrant workers; and <p>Communicate all policies to employees, contractors and sub-contractors in their relevant language.</p> <p>Develop induction material for all employees and contractors that covers all of the above.</p>	2.1

PR2: Labour and Working Conditions					
			<ul style="list-style-type: none"> adopting and supporting the 10 principles of the UN Global Compact including work (labour) standards <p>Upgrade the corporate policies to the Project specific.</p>		
2.2	<i>Child and Forced Labour</i>	PC	<p>The Client's human rights policy encompasses all employees of Client as well as the candidate talents, who way, in the future, work within the organization thereof. It details their commitment to:</p> <ul style="list-style-type: none"> Do not permit forced labour, child labour, employment of illegal immigrants and or foreigners who do not have work permit, any maltreatment or any act of exploitation 	<p>Ensure that all Project specific policies and procedures make reference to the commitments in the Corporate Human Rights Policy.</p> <p>Ensure that the Contractor Management Plan has a clause relating to forced and child labour.</p>	2.1
2.3	<i>Non-Discrimination and Equal Opportunity</i>	PC	<p>The Client's Human Resources Policy (including the human rights policy_ encompasses all employees of Client as well as the candidate talents, who way, in the future, work within the organization thereof. It states they value diversity of employees and employee candidates without any discrimination related to race, religion, language, color, ethnicity nationality, gender, marital status, age or disability and implement all Human Resources processes without making any such discrimination. It also details their commitment to:</p>	<p>Develop a Project specific HR policies and procedures and ensure these are communicated with employees, contractors and sub-contractors, see PR 2.1</p>	2.1

PR2: Labour and Working Conditions

			<ul style="list-style-type: none"> recruitment policy and processes that match candidates with the proper Knowles and qualification with relevant positions, without any discrimination related to gender, race, language or religion the company stands for equal opportunities and uphold the rights of both female and male employees supporting gender equality and ensure that all employees adopt an egalitarian jargon by means of corporate training programs maintains balance of workload between female and male employees following the guidelines of Women's Empowerment Principles (WEPs) 		
2.4	<i>Workers Organizations</i>	PC	<p>The Client's Human Rights policy encompasses all employees of Client as well as the candidate talents, who may, in the future, work within the organization thereof. It details their commitment to:</p> <ul style="list-style-type: none"> respect employees freedom of unionization, right to collective bargaining, and voluntary participation to appropriate social activities with the awareness of social responsibility 	Develop a Project specific HR policies and communicate these with employees, contractors and sub-contractors (see PR 2.1).	2.1
2.5	<i>Wages, benefits, and conditions of work</i>	PC	<p>The Clients' Human Resources policy details their compensation policy, paying attention to the provision of competitive and fair compensation.</p>	Develop a Project specific HR policies and communicate with employees, contractors and sub-contractors (see PR 2.1).	2.1

PR2: Labour and Working Conditions					
			The Client has not yet created project specific documentation related to working conditions, including information related to: wages, benefits, and conditions of work.	Ensure a Project specific HR policies include provisions for migrant workers.	
2.6	<i>Worker Accommodation</i>	N/A	It is understood, the client will not provide worker accommodation	N/A	
2.7	<i>Collective Dismissals/Retrenchment²</i>	N/A	N/A	N/A	
2.8	<i>Grievance Mechanism</i>	PC	A Worker Grievance Mechanism (GM) is under development as part of the SEP including mechanisms to log, record, investigate and resolve grievances, and roles and responsibilities for implementation.	Implement workers grievance mechanism and grievance register/ log. Provide to ERM for review. Communicate to and ensure access for all workers, including contractor workforce.	2.2
2.9	<i>Supply Chain</i>	PC	As part of the present ESDD, the client commissioned a first human rights risk assessment connected to the Project's solar supply chain. The assessment concludes that, due to the lack of evidence of effective management systems by EPC Contractor and Primary Supplier (see 2.2), the exposure to human rights risk in the supply chain remains. The client has not shown the capacity to manage human rights risks through an effective Supply Chain Management System (SCMS).	Based on the findings of the supply chain risk assessment as part of the ESDD, the Client shall develop and implement an effective Supply Chain Management System (SCMS) including: <ul style="list-style-type: none"> • Embed human rights risks in the supply chain within decision-making systems, defining accountability and responsibility within the client organizational structure • Establish KPIs at corporate and project levels for reviewing and 	2.4

² Will not be applicable to many projects at appraisal stage. However, evidence, within the last 3 years of client approach to retrenchment, which is not compatible with the Policy should be taken into consideration.

PR2: Labour and Working Conditions

	<p>Only few policies and procedures are in place which have recently been updated, however various shortcomings have been identified:</p> <ul style="list-style-type: none"> • The Client has no clear commitment in place to conduct human rights due diligence in line with international standards (i.e. UNGPs, OECD guidance) • An updated Supply Chain Policy (updated 25.01.2024) is in place which outlines Client’s expectations of its suppliers including the prohibition to use forced and child labour. However, the policy does not include the requirement for suppliers to conduct due diligence to ensure compliance. Upon contract signing the policy reportedly is included in the Annex of the contract • A procurement procedure (updated 25.01.2024) is in place however human rights risks are not at all or only at a high level taken into consideration during the tendering process (supplier identification/pre-assessment; offer evaluation; contract purchase and post-purchase site entry criteria). Examples of documents that may be requested as part of the environmental and social evaluation of the potential supplier are listed (i.e. supply chain mapping, E&S compliance 	<p>acting on human rights due diligence in the supply chain</p> <ul style="list-style-type: none"> • Update contract clauses with supplier on labour risks and management including the right to conduct audits. • Adopt ‘auditability’ principles as a pre-requisite for social audits, including: privacy of workers during interviews, transparency of documentation, unfettered access to facilities, independency of auditors. • Incorporate the requirements of auditability into contracts with suppliers. The Client should be able to terminate a sourcing contract if any of the criteria on auditability are not met. • Clearly communicate the requirements to suppliers and provide training (if necessary). • Require visibility of supply chains from raw materials to PV panels. Review traceability protocols from solar module suppliers down to wafer/ingot producers and, if possible, down to polysilicon, and consider on-site spot checks to verify volume and capacity and whether inconsistencies are present. • Assess its leverage in relation to its suppliers, considering elements such as the degree of trust, stability of supply, length of business partnerships. • Taking into consideration the leverage to design its SCMS, 	
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PR2: Labour and Working Conditions

		<p>assessment reports), it is however unclear whether all suppliers are required to provide the information and how the information is evaluated. Apart from H&S and environmental requirements no further human rights requirements are included in the supplier post purchase site entry criteria.</p> <ul style="list-style-type: none"> As part of the procurement process suppliers are required to complete an ESG survey (updated 25.01.2024) which includes some high-level questions related to the suppliers' policies and procedures in place (incl. child/forced labour, discrimination, working hours, wages, freedom of association etc). According to the updated pre-supplier evaluation form (updated 26.01.2024), the results of the ESG survey and of an open-source screening are considered in the supplier approval process. The evaluation criteria and scoring system applied are however not clear. No evidence of the pre-screening and the ESG survey conducted in relation to the PV supplier was provided. The general, non-project specific HSE Contract provided, only includes some high-level requirements related to some human rights. 	<p>aiming at increasing leverage over time.</p> <ul style="list-style-type: none"> Develop KPIs to monitor and track the effectiveness of the measures in place Establish a grievance mechanism that is accessible to external stakeholders and require the EPC Contractor to have an effective grievance mechanism in place and to cascade down the requirement to the PV supplier. Establish a system for mitigation/remediation in case an incident is reported/identified. 	
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PR2: Labour and Working Conditions					
			<ul style="list-style-type: none"> No evidence of a system in place for mitigation/remediation in case an incident is reported/identified. 		
2.10	<i>Non-Employee Workers</i>	PC	The Client has not developed any specificities related to the working requirements of non-employees or third parties (sub-contractors or other intermediaries).	<p>Develop Contractor Management Plan in line with identified risks and impacts associated with non-employee workers.</p> <p>Incorporate relevant E&S management plans conditions into tender documents, and contracts for all contractors and ensure dissemination into sub-contractor contracts.</p>	2.1 2.2
2.11	<i>Occupational Health and Safety (OHS)</i>	PC	<p>The Client has an Occupational Health and Safety Policy to ensure and maintain occupational health and safety for all relevant stakeholders including the employees, sub-employers and visitors of Client and all affiliates of the holding.</p> <p>The client has developed some provisions to ensure OSH in the workplace, such as mentions of training and wearing of protective equipment and confirmation that Project activities will be in accordance with Turkish OSH laws.</p> <p>The Client has also confirmed in the EIA that they will develop and implement a workplace safety and accident prevention plan in line with EBRD PRs and National regulations.</p>	Develop a project specific Occupational Health and Safety Management Plan.	2.3

PR3: Resource Efficiency and Pollution Prevention and Control

PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
3.1	<i>Emissions to air</i>	PC	<p>No air quality baseline assessment was conducted during the EIA. The EIA only contains an air quality chart from Balıkesir Province Central MTHM Station located around 40 km south of the Project.</p> <p>As of February 2024, the air quality baseline collection has been initiated.</p>	Complete the air quality baseline and impact assessment.	1.1 3.1
3.2	<i>Emissions to water</i>	PC	<p>The surface water baseline chapter of the EIA identifies the main streams, lakes and ponds in the Balıkesir Province.</p> <p>The groundwater baseline in the EIA identifies the groundwater potential in the Balıkesir Province and water extraction by district. For groundwater quality a water sample was taken but the results are not presented in a table comparing them with the applicable standards.</p> <p>The EIA does not provide an inventory of emissions to water for the project.</p> <p>According to the EIA (Annex 16) a hydrogeological assessment report was prepared.</p> <p>Regarding wastewater the EIA specifies that wastewater will be generated from personnel construction and operation phase and will be stored in septic tanks and removed by the general directorate.</p>	<p>Provide the groundwater quality results in a table comparing them to the applicable standards.</p> <p>Provide an inventory of emissions to water for the project.</p>	1.1 3.1

PR3: Resource Efficiency and Pollution Prevention and Control				
			The EIA also identified the amount of wastewater per person per day.	
3.3	<i>GHG emissions</i>	PC	The EIA does not calculate the total amount of greenhouse gas emissions during the construction phase. Only the emission amount in kg/hour was assessed in the EIA. In line with the EBRD's ESP, projects with a net change in annual emissions of 25,000 t CO ₂ e per year or with gross emissions of more than 100,000 tons of CO ₂ -equivalent per annum are required to report such emissions annually to the Bank.	Provide the total amount of greenhouse gas emissions per year during construction 3.1
3.4	<i>Energy use and efficiency</i>	PC	<p>Actions regarding energy efficiency of the panels are specified in the EIA. However, no conducted evaluation of consumables and wastes was done. The planned energy consumption during construction and operation of the Project is not specified in the EIA.</p> <p>A strategy to minimize energy usage and to re-use/recycle waste materials has not been developed.</p>	<p>Provide information on consumables and waste as well as planned energy consumption during construction and operation of the Project.</p> <p>Develop a strategy and mitigation measures to minimize energy usage.</p> 3.1
3.5	<i>Water use</i>	PC	Water for cleaning panels quantifies the expected water use in the EIA. During construction water will be needed for the workers and for dust prevention.	<p>Provide the total amount of water needed during construction and yearly operation and specify from where the water will be sourced. Provide mitigation measures for reducing water use.</p> <p>Develop a waste and wastewater management plan including the total amount of water will be used for construction and operation phases, where the will be sourced and mitigation</p> 3.1

PR3: Resource Efficiency and Pollution Prevention and Control					
				measures, treatment and disposal methods of wastewater.	
3.6	<i>Waste generation</i>	PC	<p>According to the EIA waste will be collected and disposed of according to the waste management system of the municipality. The EIA identified the total amount of solid waste per day during construction. The amount of solid waste per day should also be specified during operation.</p> <p>A waste management plan needs to be developed to demonstrate technical and financially feasible alternatives for environmentally sound disposal.</p>	<p>Specify the amount of solid waste per day during operation.</p> <p>Develop a waste and wastewater management plan.</p>	3.2
3.7	<i>Hazardous substances and materials</i>	PC	<p>According to the EIA there will be no use of hazardous, toxic or chemical substances within the scope of the project. Nevertheless, according to the EIA there will be a hazardous waste storage area in the facility for temporary storage of e.g., broken panels.</p>	<p>Clarify whether broken panels are considered hazardous waste and specify the technicalities and the mitigation measures taken in the hazardous waste storage area.</p>	3.1 3.2
3.8	<i>Pesticides</i>	N/A	<p>It is not expected that pesticides will be used during construction or operation of the Project.</p>	N/A	
3.9	<i>Persistent organic pollutants (POPs)</i>	N/A	N/A	N/A	
3.10	<i>EU REACH chemical safety regulation</i>	N/A	N/A	N/A	
3.11	<i>Refrigerants</i>	N/A	N/A	N/A	
3.12	<i>Contaminated land</i>	N/A	N/A	N/A	

PR3: Resource Efficiency and Pollution Prevention and Control

3.13	<i>Noise</i>	PC	<p>No baseline noise measurements have been conducted as part of the EIA. The EIA should also identify the nearest noise receptors in the AoI (such as houses, public buildings, schools, hospitals).</p> <p>Additional general mitigation measures regarding noise need to be considered (e.g., speed limits for construction traffic, avoid noisy nighttime works, etc.)</p> <p>As of February 2024, the noise baseline collection has been initiated.</p>	<p>Complete the noise baseline and impact assessment.</p> <p>Identify noise receptors in the AoI and elaborate on mitigation measures for noise.</p>	1.1 3.1
3.14	<i>Odor</i>	N/A	It is not expected that the Project includes activities that could potentially generate odors.	N/A	
3.15	<i>Circular economy</i>	FC	The EIA shows considerations with regards to circular economy techniques. Packaging waste or damaged panels will be recycled. Extracted topsoil during construction will be reused during landscaping works.		

PR4: Health, Safety, and Security					
PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
4.0	<i>General Requirements for Health and Safety Management</i>	PC	<p>The EIA specifies Project compliance with National Labour Laws, as well as the Health and Safety Laws (including occupational H&S), General Hygiene Law and provisions of the Occupational Health and Safety Services Regulations.</p> <p>The EIA states measures to identify and prevent workplace accidents, injury and ill-health to workers and Project-affected communities.</p>	<p>Develop project specific Community Health and Safety Management Plan including details on preventative measures, roles and responsibilities emergency arrangements, incident mechanism and training requirements.</p> <p>Include details on H&S in training and induction material.</p>	4.1
4.1	<i>Community Health and Safety</i>	PC	<p>Refer to Item 1.1</p> <p>The SIA will include suitable mitigation measures to help avoid or minimize potentially adverse impacts, that are fitting to the scale and nature of the Project</p>	Develop a Community Health and Safety Management Plan including details on preventative measures, roles and responsibilities, emergency arrangements, and grievance and incident mechanism.	4.1
4.2	<i>Infrastructure, Building, and Equipment Design and Safety</i>	FC	In the EIA, the Client shows considerations for health and safety in the planning of various Project stages and planning of structural components.		
4.3	<i>Hazardous Materials Safety</i>	PC	<p>The EIA states that no “explosive, hazardous, flammable, toxic, or chemical substances” will be used throughout this Project.</p> <p>A list of measures is included for “extraordinary situations” if human health and safety is threatened.</p>	Develop community health and safety plan (see PR 4.2), and include provisions for hazardous materials safety if applicable.	4.1
4.4	<i>Product and Services Safety</i>	N/A	Project does not involve the production of an/or trade in consider products	N/A	N/A

PR4: Health, Safety, and Security					
4.5	<i>Traffic and Road Safety</i>	PC	<p>The EIA includes considerations related to traffic and road health and safety.</p> <p>However, the measures and plans for minimizing traffic and road impacts has not been developed.</p>	<p>Develop traffic management plan.</p> <p>Develop community health and safety plan (see PR 4.2), and include provisions for traffic and road safety if applicable.</p>	4.2
4.6	<i>Natural Hazards</i>	FC	<p>The Client includes considerations and procedures for ground safety and natural hazards (flood and landslide risk).</p>		
4.7	<i>Exposure to Disease</i>	PC	<p>The Client has not made considerations for community members or vulnerable persons and have not considered potential exposure to diseases relative to such groups.</p> <p>A social baseline has been initiated and impact assessment will be conducted which will include risks and impacts associated with project activities and influx of temporary and permanent workforce. The impact assessment will also include the mitigation measures to minimize the transmission of diseases.</p>	<p>Develop project specific E&S management plans including procedures for contractor workforce behavior, disease prevention</p> <p>Develop Community Health and Safety Management Plan</p>	4.1
4.8	<i>Emergency Preparedness and Response (EPRP)</i>	PC	<p>An EPRP has been developed as an Annex to the Project EIA specifying general scope of responsibilities. While there is no specific mention of the actual personnel who will be part of this team this can be completed after the appraisal stage.</p>	<p>The Client shall update the EPRP after the appraisal stage, including key risks found from the SIA. Organizational capacities should be clearly assigned rather than only defining the roles. The plan shall also be updated to include further protocols on dealing with specific cases (i.e. protocol for a fire, protocol for flood, incident and reporting protocols, etc.) and communicate to relevant stakeholders.</p>	4.3

PR4: Health, Safety, and Security

				Conduct training and drills with communities and workforce.	
4.9	<i>Security Personnel Requirements</i>	PC	The client has specified that there will be security arrangements but not what the potential security risks posed by such arrangements are to those within and outside of the Project site.	<p>Develop a security management plan. This should include the measures to management potential project security threats to workers and affected communities, monitoring and reporting requirements, roles and responsibilities, and references to worker and community grievance mechanisms.</p> <p>Provide training to security personnel (or ensure security contractor provides training to their personnel) in the Voluntary Principles on Security and Human Rights.</p>	4.4

PR5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement					
PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
5.1	<i>Avoid or minimize displacement</i>	PC	<p>The EIA specifies that all land is privately owned and hence there will be no involuntary resettlement. However, it is noted during a site visit, members of villages GES3 and GES4 have expressed concerns about the Project preventing their access to essential grazing areas and to the villages.</p> <p>The EIA does begin to explore location alternatives, however, it does not incorporate stakeholder and local concerns into this assessment.</p> <p>A resettlement expert has been engaged to assess whether displacement has occurred.</p> <p>Social baseline and SIA studies has been initiated and will include measures to avoid, minimize displacement, and avoid forced eviction, census, and inventory of affected community assets, supplemented by engagement with affected stakeholders.</p>	<p>Develop E&S management plans to ensure measures are in place to avoid and/or minimize displacement.</p> <p>If displacement is to occur, develop a Resettlement Policy Framework / Livelihood Restoration Framework as part of the updated SIA.</p>	1.1
5.2	<i>Consultation</i>	PC	<p>According to the information provided by Client, Project does have Public interest decision.</p> <p>Some members of the community were consulted regarding the public interest decision, however, thorough stakeholder engagement was not conducted.</p> <p>During a site visit to the area in the end of October 2023, locals from GES3 and GES4 have shown objections to expropriation as</p>	<p>Conduct further engagements with potentially affected persons; especially a diverse group of stakeholders from GES3 and GES4.</p> <p>Update SEP in line with consultations undertaken regarding land, displacement, and livelihoods.</p>	5.1

PR5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement					
			they rely on these grazing areas, but this is not included in the EIA.		
5.3	<i>Consideration of Vulnerable Groups and Gender Aspects</i>	PC	<p>Social baseline and impact assessment studies have been undertaken in February 2024 and will assess the impacts to vulnerable groups nor have they included any gender considerations.</p> <p>A Livelihood restoration process has been initiated and will include gender and vulnerable groups.</p>	The updated social baseline, SIA and Livelihood Restoration Process to ensure it sufficiently considers vulnerable groups and gender aspects.	1.1 5.2
5.4	<i>Compensation for displaced persons</i>	PC	A Livelihood restoration process has been initiated.	Develop compensation strategy integrate into the livelihood restoration process and LRP.	1.1 5.2
5.5	<i>Grievance mechanism</i>	PC	<p>The Client has not created or implemented a functioning GM to address community concerns or grievances related to land acquisition.</p> <p>A GM is under development as part of the SEP.</p>	<p>Develop GM (see PR10).</p> <p>Implement GM and ensure community understand and have access to mechanisms in place.</p>	5.1
5.6	<i>RAP/LRP documentation, implementation and monitoring of process</i>	PC	<p>A resettlement expert has been appointed and LRP will be in place which will include the updated social baseline, findings from the SIA, implementation strategy and monitoring framework.</p> <p>LRP will also include cut-off dates, eligibility classification, voluntary land donations, economic compensation and benefits for affected persons.</p>	Develop Livelihood Restoration Plan.	5.2

PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
6.0	<i>Desktop studies</i>	PC	<p>Desktop studies in accordance with EBRD Requirements were not undertaken within the scope of the existing EIA.</p> <p>ERM has been tasked for the desktop assessment.</p>	<p>A high level, rapid desktop assessment should be done using publicly available global datasets and indicators, most importantly the Integrated Biodiversity Assessment Tool (IBAT: https://www.bat-alliance.org) to inform which aspects of biodiversity (e.g. faunal groups) should be the focus of biodiversity surveys.</p>	1.1 6.1
6.1	<i>Baseline and impact assessment</i>	PC	<p>Over the years, numerous baseline studies have been systematically conducted within the operated wind farm area which is overlapping the planned solar energy plant. In the same year, three distinct Ecosystem Assessment Reports were crafted in different scopes, each tailored to specific timelines. In addition, a "Bat Monitoring Report" which covered past field survey analysis about bat and carcass data were prepared in 2018 likewise. However, these baseline survey data is outdated, and these would not be considered acceptable by lender's (>5 years old).</p> <p>According to the EIA, Testudo Gracea, recognized Vulnerable regarding to IUCN Red List, was discerned. Conversely, the botanical assessments revealed no instances of threatened or endemic species. However, that the conducted studies only encapsulate a fraction of the planned solar power plant site. Specifically, field investigations have yet to be conducted in natural vegetation, posing a limitation to the comprehensiveness of the findings.</p>	<p>Determine and map the Project Area of Influence (AoI) to establish the biodiversity receptors. The AoI needs to be explicitly defined. This should be undertaken using GIP (Good International Practice) guidelines;</p> <p>Complete the baseline and impact assessment studies.</p>	6.1

PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

			<p>During the autumn of 2022 and the spring of 2023, ornithological monitoring studies were conducted to represent migratory patterns. It was noted that while the planned solar power plant is not situated directly along the main migratory routes, it is in proximity to secondary migration paths. Despite this proximity, no significant migratory movements were observed during the conducted studies. However, three species were identified with conservation statuses according to the International Union for Conservation of Nature (IUCN): <i>Streptopelia turtur</i> and <i>Pelecanus crispus</i> were categorized as "Vulnerable," while <i>Lanius senator</i> was classified as "Near Threatened."</p> <p>Biodiversity baseline data collection (terrestrial flora, habitat, vegetation and terrestrial fauna) and impact assessment studies have been initiated in February 2024 to cover the identified gaps during this ESDD.</p>		
<i>Habitat assessment</i>	PC	<p>Habitat types have not been identified and mapped in the Project Area according to an applicable classification system. The loss and fragmentation of habitat can be a significant impact for solar projects in general.</p> <p>ERM has been engaged to conduct habitat assessment.</p>	<p>Develop a habitat map according to the European Nature Information System (EUNIS). This can be a largely desktop (remote-sensing) exercise in GIS, with field verification of representative habitat types and status/condition. The loss and fragmentation of habitat can be a significant impact and this should be quantified in terms of habitat extent and condition.</p>	6.2	
<i>Critical habitat</i>	PC	<p>According to the EIA, it was determined that the Project area and its close vicinity have natural habitat compositions. The Project area covers forest, steppe and meadow habitats which may qualify as critical habitat as well as having PBFs (Priority Biodiversity</p>	<p>Undertake a formal Rapid Critical Habitat Assessment (RCHA) (as per EBRD PR6 guidance regarding CHA);</p> <p>If critical habitats are identified and could be impacted directly, indirectly or</p>	6.2	

PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

			<p>Features). However a critical habitats and PBFs have not been identified for planned solar plant area considering EBRD PR 6.</p> <p>EBRD PR6 also requires an assessment Priority Biodiversity feature (PBFs) in addition to critical habitat. This should be included in the RCHA.</p> <p>ERM has been engaged to conduct a critical habitat assessment.</p>	<p>cumulatively, a BMP (Biodiversity Management Plan) needs to be compiled to address 'no net loss' or 'net gain' biodiversity objectives based on the risk of impacting these areas and contributing to residual impacts to critical habitat and/or associated qualifying species or other biodiversity values.</p> <p>An assessment of the need and desirability of a biodiversity offset (for habitat and/or species) may be warranted, depending on the outcomes of the CHA. This needs to be understood in terms of meeting no net loss or net gain objectives for the project. In line with EBRD PR6, the following needs to be implemented where critical habitat is identified the client will not implement any project activities unless all of the following are demonstrated:</p> <ul style="list-style-type: none"> • For critical habitats, no further fragmentation conversion or degradation to take place and • No project activities are permitted in critical habitat unless certain specific conditions of PR para 15 first met. <p>A robust, appropriately designed, and long-term biodiversity monitoring and evaluation program is integrated into the clients' management program.</p>	
<i>Ecosystem services</i>	PC	Ecosystem services, and impacts thereon, are not addressed in the EIA report.	Ecosystem services will be assessed in coordination with the social assessment to develop an appropriate baseline on which	6.2	

PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
			ERM has been tasked to conduct biodiversity impact assessment including ecosystem services.	the assessment of risks/impacts can be based.	
	<i>Invasive alien species</i>	PC	<p>An invasive species assessment is lacking from the EIA studies.</p> <p>The desktop study in the EIA report does not state whether there are any invasive species likely to be present on the project site.</p>	<p>An assessment of invasive species risks/impacts and potential pathways for introducing invasive/alien plant or animal species to the site needs to be undertaken.</p> <p>Include specific recommendations for managing and monitoring invasive species as part of an invasive species control program to be developed, particularly for the construction phase when foreign materials and workers will enter the site.</p>	6.2
	<i>Biodiversity Management Plan</i>	PC	<p>The EIA report does not include a Biodiversity Management Plan.</p> <p>A comprehensive Biodiversity Management Plan should be developed and implemented for both the construction and operation phases including appropriate and site-specific mitigation and monitoring measure based on the result of the impact assessment.</p> <p>The plan will include a clear representation of role and responsibility, auditing and reviewing process and a reporting commitment.</p>	Develop a Project specific Biodiversity Management Plan	6.3

PR8: Cultural Heritage					
PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
8.1	<i>Assessment and Management of Impacts on Cultural Heritage</i>	PC	<p>A screening and assessment of tangible cultural heritage assets was carried out in the EIA. The EIA states that experts from the Museum Directorate visited the Günaydin Project area on 20.01.2022 and carried out the necessary examinations. According to the EIA, experts from the Directorate found that there are no tangible cultural heritage assets present in and around the Project area within the scope of Article 7 of Law No. 2863.</p> <p>Intangible cultural heritage was not screened nor evaluated as part of the EIA.</p> <p>There is no evidence of a chance find procedure.</p> <p>A cultural heritage baseline survey has been initiated for the Project in February 2024 including intangible cultural heritage.</p>	<p>A comprehensive Chance Finds Procedure (CFP) shall be developed to ensure that sufficient protocols; the CFP will complement the requirements stipulated by the experts from the Museum Directorate.</p> <p>Ensure the CFP is communicated to and shared with all contractors.</p>	8.1
8.2	<i>Consultation with affected communities and other stakeholders</i>	PC	<p>Stakeholders and the affected communities were not consulted on their use of assets of cultural heritage. Thus, stakeholder inputs were not considered when assessing the areas/assets of cultural importance within/around the study area.</p> <p>Refer to Item 8.1</p>	<p>Conduct further engagements with communities and other stakeholders on tangible and intangible cultural heritage.</p>	8.1
8.3	<i>Project use of Cultural Heritage</i>	N/A	<p>The Project does not propose to use the cultural resources, knowledge, innovations or practices of local communities for commercial purposes.</p>		

PR10: Information Disclosure and Stakeholder Engagement

PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
10.1	<i>Stakeholder Engagement Plan</i>	PC	<p>The client has developed a Stakeholder Engagement Plan (SEP) as part of the EIA. It provides a framework of objectives and principles but no evidence of actionable protocols and activities.</p> <p>This SEP for EIA has not identified nor documented stakeholders, conducted a stakeholder mapping and analysis exercise, nor does it identify disadvantaged or vulnerable groups who may be affected by the Project.</p> <p>There is no action plan for engagement activities as part of the EIA and throughout the life of the project, timelines, nor are findings from the social baseline or SIA incorporated.</p> <p>There is no stakeholder database nor stakeholder engagement register/ log.</p> <p>An updated SEP is currently being prepared and will include a GM (community and workforce GM). The SEP will specify requirements for the client to sufficiently carry out, document, track, evaluate and report on engagement activities with stakeholders, including provisions for vulnerable groups.</p>	<p>Develop SEP for the project including stakeholder identification and analysis (including vulnerable groups), summary of past engagement carried out and an engagement plan to guide all future engagement, before construction begins.</p> <p>Develop and maintain a stakeholder database, and stakeholder engagement log.</p>	10.1
10.2	<i>Operational Grievance Mechanism</i>	PC	<p>The client has included a framework for the Grievance Mechanism for external stakeholders in the EIA, however it does not include specific mention of provisions for community vs workforce grievance</p>	<p>Develop project specific community grievance mechanism and raise awareness of the process in all affected communities.</p>	10.1

PR10: Information Disclosure and Stakeholder Engagement

			<p>mechanism. It includes general principles rather than a clear set of actions, definitions, timelines, and designated organizational capacities.</p> <p>SEP is under development and will include a Grievance Mechanism (GM) that includes both a Community Grievance Mechanism and workforce grievance mechanism. It will explain the protocol for submitting, addressing, and responding to grievances. It will clearly indicate what constitutes eligible and ineligible grievances and how all stakeholders and Project proponents are expected to use the GM. It will also allow for the submission of anonymous grievances and the monitoring procedures.</p>	<p>Establish two separate grievance registers/databases to file and process community and workforce grievances separately.</p> <p>Create a commitment register to document and track agreements made to stakeholders and ensure that they are fulfilled in the agreed upon time frames.</p>	
10.3	<i>Information Disclosure</i>	PC	<p>The EIA has been disclosed publicly and the project announced in national and local provincial newspapers.</p> <p>The client has achieved a public benefit decision favoring the Project, however, this only refers to expropriation and land acquisition rather than disclosing all Project information and specificity on risks, impacts, opportunities, and potential benefits to stakeholders.</p>	<p>Upon completion of the social baseline and SIA, the Client will communicate the relevant and key findings to stakeholders.</p>	10.3
10.4	<i>Meaningful Consultation</i>	PC	<p>A public participation meeting was held in the Yayla District Meeting Hall of the Manyas District. The aim of the meeting was to inform locals of the Project's expected activities during construction and operation and provide the opportunity to ask the project owners and company supporting the EIA.</p>	<p>Conduct further engagement with stakeholders as part of social baseline development and social impact assessment.</p> <p>Conduct engagements as part of the livelihood restoration process.</p>	10.3

PR10: Information Disclosure and Stakeholder Engagement

			<p>Engagement was also conducted during a site visit with the Mukhtar (village headman) where concerns were raised regarding access to grazing land.</p>	<p>Conduct regular engagements with community members during construction and operation.</p> <p>Document all engagements in an engagement log.</p>	
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APPENDIX A DOCUMENTS REVIEWED



Documents reviewed up to 20.11.2023

Document name

- Günaydın GES KK (pdf)
- GünaydınRES-GES (xls)
- Üretim lisansı (pdf)
- Günaydın Hibrit GES Taslak Genel Yerleşim Planı (dwg)
- Ek-5 Günaydın Hibrit Alanları (kmz)
- Günaydın (20 MW) GES İş Programı (pdf)
- Günaydın GES (local EIA), (pdf)
- EPDK Kamulaştırma Kararı günaydın (pdf)
- Jeolojik Etüt Raporu Onayı (pdf)
- Jeolojik Etüt (pdf)
- EPDK Kamulaştırma Kararı (pdf)
- Kamulaştırma Planı (pdf)
- Günaydın Hibrit GES Taslak Genel Yerleşim (dwg)
- Hidrojeoloji Raporu (pdf)
- Günaydın HKT Tutanak (pdf)



APPENDIX B PHOTOS



ERM





ERM





ERM



FIGURE 3-1 PHOTOGRAPHS OF THE PROJECT AREA



ERM

ERM HAS OVER 160 OFFICES ACROSS THE FOLLOWING COUNTRIES AND TERRITORIES WORLDWIDE

Argentina	The Netherlands
Australia	New Zealand
Belgium	Peru
Brazil	Poland
Canada	Portugal
China	Puerto Rico
Colombia	Romania
France	Senegal
Germany	Singapore
Ghana	South Africa
Guyana	South Korea
Hong Kong	Spain
India	Switzerland
Indonesia	Taiwan
Ireland	Tanzania
Italy	Thailand
Japan	UAE
Kazakhstan	UK
Kenya	US
Malaysia	Vietnam
Mexico	
Mozambique	