



REPORT

OSRES Elektrik Üretim A.Ş.

Non-Technical Summary for Kızılcaterzi WF Project

Submitted to:

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Submitted by:

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October, 2018



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1.0 INTRODUCTION

Kızılcaerzi Wind Farm (WF) Project (the “Project”) is planned to be established and operated in the Şarköy District of the Tekirdağ Province by Osres Elektrik Üretim A.Ş (Osres), a company under the Fina Enerji Holding A.Ş. (Fina).

The Project had several design revisions previously which are explained in chronological order below:

- Osres started the national Environmental Impact Assessment process in 2010 with the initial Project design of 9 turbines with total capacity of 27 MW. In line with the Environmental Impact Assessment Regulation, Project Description File was prepared and the EIA not required decision was obtained on 11.01.2010.
- In 2012, the Project design was revised and the total capacity of 9 turbines was reduced to 12 MW. In line with this change, Project Description File was prepared and the EIA not required decision was obtained again on 06.03.2012.
- In order to increase the efficiency of the Project, location of 9 turbines were revised and the capacity of the Project was increased to 14 MW. Since the switchyard location was not changed and the proposed capacity of the Project was below the limit set in the Environmental Impact Assessment Regulation, decision of the unnecessary of implementing the provisions of the EIA Regulation was given on 11.09.2012.
- Afterwards, the location of 9 turbines were changed again and Project Description File was requested to be prepared and EIA not required decision was obtained on 28.10.2014.
- Finally, the design has been changed to include 4 turbines at the wind farm of which have the total capacity of 13.6 MW_m/12 MW_e.

The energy generation license was obtained on March 22nd, 2012, with license number EÜ/3741-2/2293 and the Project's Environmental Impact Assessment (“EIA”) Process was completed in 2014 in accordance with the Environmental Impact Assessment Regulation (Official Gazette No: 29186, Date: 25.11.2014) and EIA is not required decision was obtained on 28.10.2014. Initially the Project was designed to have 9 turbines with the total capacity of 14.4 MW_m/12 MW_e, however the design has been changed after the EIA not required decision to include 4 turbines which have the total capacity of 13.6 MW_m/12 MW_e. Previously obtained permits are still valid for the Project as the capacity of the Project did not increase and the license area did not change. Client asked about the validity of EIA is not required decision to the Provincial Directorate of Tekirdağ Environment and Urbanization and took the official letter (dated: 17.02.2017 and numbered: E.1349) with regard to EIA decision is still valid.

The construction period is 6 months and operation will last for 49 years. The Project will be financed by International Finance Institutions (“Lender”) and therefore requires comprehensive assessment of certain environmental and social issues as a Lender requirement.

1.1 The Goal of This Document

This document is a non-technical summary (NTS) of the Environmental and Social Impact Assessment studies conducted for the Project according to the standards of international Lenders in a non-technical language, together with the mitigation measures proposed by Osres for the management of the Project environmental and social issues.

1.2 Standards to be Applied in the Project

Osres commits to adhere to the provisions of Turkish Legislation applicable to the Project during the life time of the Project. These requirements include (but are not limited to) the Environment Law, Occupational Health and Safety Law, Labour Law and their issued regulations.

The Project will also comply with the Performance Standards of International Finance Corporation (IFC), Environmental and Social Performance Requirements of the European Bank for Reconstruction and Development (EBRD) and European Union legislation. These requirements are more stringent than national legislation, European Union environmental and social standards.

1.3 Project Categorisations

The requirements from IFC, EBRD and KFW regarding the Environmental and Social Assessment process and outcomes differ depending on the category of the project. Projects are categorized as follows:

Table 1: Project Categorisation

Category	Description of the Project		
	IFC	EBRD	KFW
Category A	Projects with potential significant adverse environmental and social risks and/or impacts that are diverse, irreversible or unprecedented	Project that could result in potentially significant adverse future environmental and/or social impacts which, at the time of categorisation, cannot readily be identified or assessed, and which, therefore, require a formalised and participatory environmental and social impact assessment process.	Potentially diverse significant adverse or irreversible impacts or risks to human health, the environment or the climate.
Category B	Projects with potential limited adverse environmental and social risks and/or impacts those are few in number, generally site-specific, largely reversible and readily addressed through mitigation measures.	Projects with potential adverse future environmental and/or social impacts that are typically site-specific, and/or readily identified and addressed through mitigation measures.	Significant adverse environmental or social impacts or risks are less severe and can usually be mitigated with state-of-the-art measures or standard solutions.

The potential environmental and social impacts and risks of the projects were identified based on the project screening information presented in the scoping report and the additional information collected during the scoping phase. These impacts and risks are:

- Site specific
- Readily identifiable and

- Can be readily addressed by standard industry practice mitigation measures (as also detailed in the following sections)
- Largely reversible

Thus, the project is determined to be category B.

2.0 THE PROJECT

2.1 The Purpose of the Project

Kızılcaerzi Wind Farm Project is planned to be carried out in Tekirdağ Province to generate electricity by using the renewable resource of wind power. The Project will consist of 4 turbines and each will have the type of GE 3.4-130 turbines.

Today, the primary sources of the world's energy production are non-renewable energy sources such as oil, natural gas and coal. Particularly because natural gas pollutes the environment less, its share in energy production is increasing day by day. As you can see in the graphic below, the world's most used energy source is petrol. Secondly, there is coal which has a decreasing trend and thirdly there is natural gas whose production and consumption has an increasing trend. The importance of a certain energy sources changes over time.

The energy requirement of the world increase day by day together with the increased population, industrialization, development of technology and high living standard resulting in environmental concerns. The importance of renewable energy sources has started to increase in line with the increased tendency and sensitivity on reducing global warming. As the climate change became a major issue globally, clean energy production has become a future opportunity and benefit for human being on the planet. Using renewable energy has become one of the major implications of a country's level of development where renewable energy investments (e.g. Solar, wind, geothermal, hydro, and some forms of biomass) has set a record in 2015 globally.

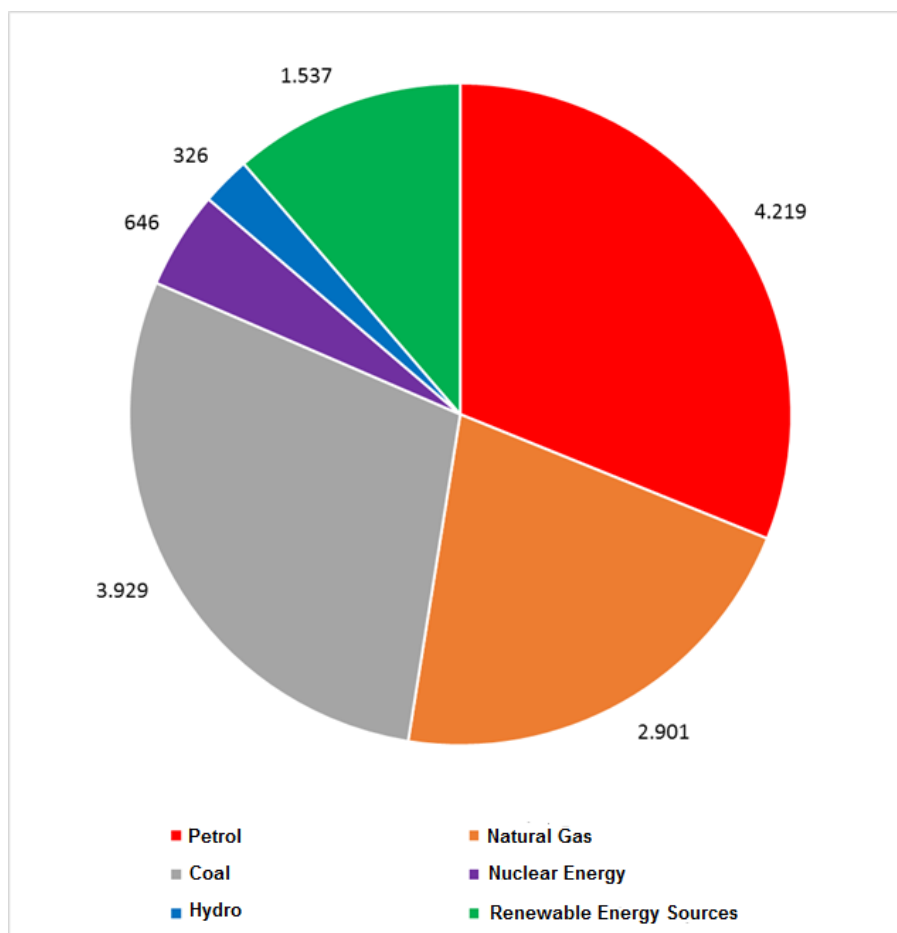


Figure 1: Distribution of Primary Energy Consumption in the World by Sources-2013 (Million-tons of oil equivalent)
Total = 13,559 M-TOE

According to 2015 statistics, Turkey's energy production from renewable sources (6.5%) is relatively low compared to natural gas (37.9%), coal (29.1%) and hydro (25.6%). However, the highest share increase was observed in the usage of renewable sources where the share was increased from 0.3% to 6.5% in 10 years. According to the Electricity Market and Supply Security Strategy Document published in 2009, it is aimed that the share of renewable energy resources in energy production will be at least 30% in 2023.¹

Turkey has an increasing demand in energy and the use of clean, non-dependent, endless renewable energy has become more important for Turkey in order to meet the demands. Total electricity generation in Turkey increased by %9 in 2014 and 3.9% in 2015.

Wind energy is one of renewable energy sources where the technology is developed rapidly in the world. The technology provides the wind turbines to convert the kinetic energy into mechanical energy which is then converted into electricity by a generator. Wind energy is one of the important sources of clean energy production while playing an important role in fighting global warming.

The wind potential of Turkey is very valuable as the usage of wind as an energy resource has increased since 2005. In Turkey, the decrease in electricity imports of natural gas reached to 574 million dollars with the energy produced by wind energy in 2015. The total installed capacity of 172 wind power plants located in Turkey is 5,789.39 MW and in total 15,369,548,000 kWh electricity production was made with wind farms in 2016.² Turkey

¹ Enerji ve Çevre Dünyası Dergisi, Mart 2017

² <http://www.enerjiatlasi.com/ruzgar/>

ranks third in Europe and seventh in the world considering the total installed wind capacity in 2016. According to Electricity Market and Supply Security Strategy Document published in 2009, it is aimed to produce 100,000 MW electricity from renewable sources where 20,000 MW is aimed to be produced from wind in 2023.³ Wind Map of Turkey is given in below.

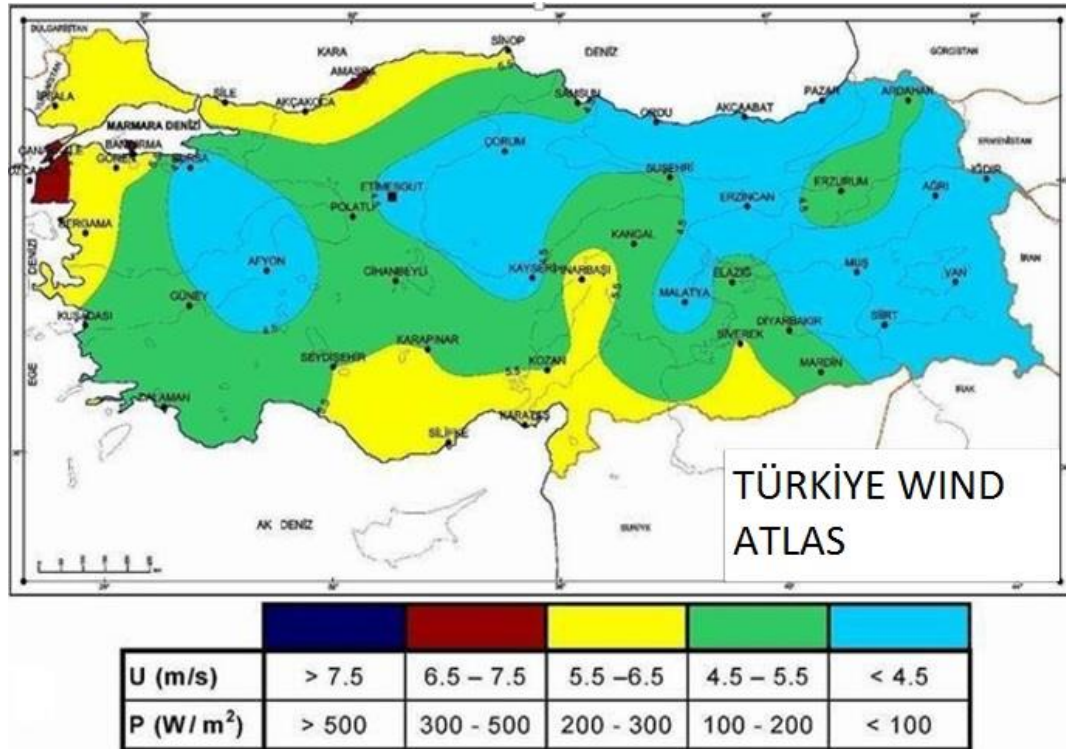


Figure 2: Turkey Wind Map⁴

2.2 Project Area

The Project Site is located in Tekirdağ Province near the Şarköy District, 5 km north of the Sea of Marmara in northwest of Turkey. The Project area can be accessed by using the asphalt road between Şarköy District Centre and Yeniköy.

The nearest district to Project area is Şarköy which is 6.6 km distance away from Project area and the nearest village is to the turbines is Sofuköy which is 2.2 km away from T1. There is also a private facility of Ch Kalpak Vineyards, 800 m away from T2 turbine.

Google Earth view of the Project area/Licence area and general layout of the Project are given in figure 3 and Figure 4. The Site Photographs are provided in the Appendix B. The Licence area was given by the Republic of Turkey Energy Market Regulatory Authority which is a permitting area that the Client can develop a project within that given boundary. Project area is determined in accordance with the project components (location of turbines, access roads and switchyard) established by the Client.

³ Enerji ve Çevre Dünyası Dergisi, Mart 2017

⁴ <https://www.mgm.gov.tr/arastirma/yenilenebilir-enerji.aspx?s=ruzgaratlası>

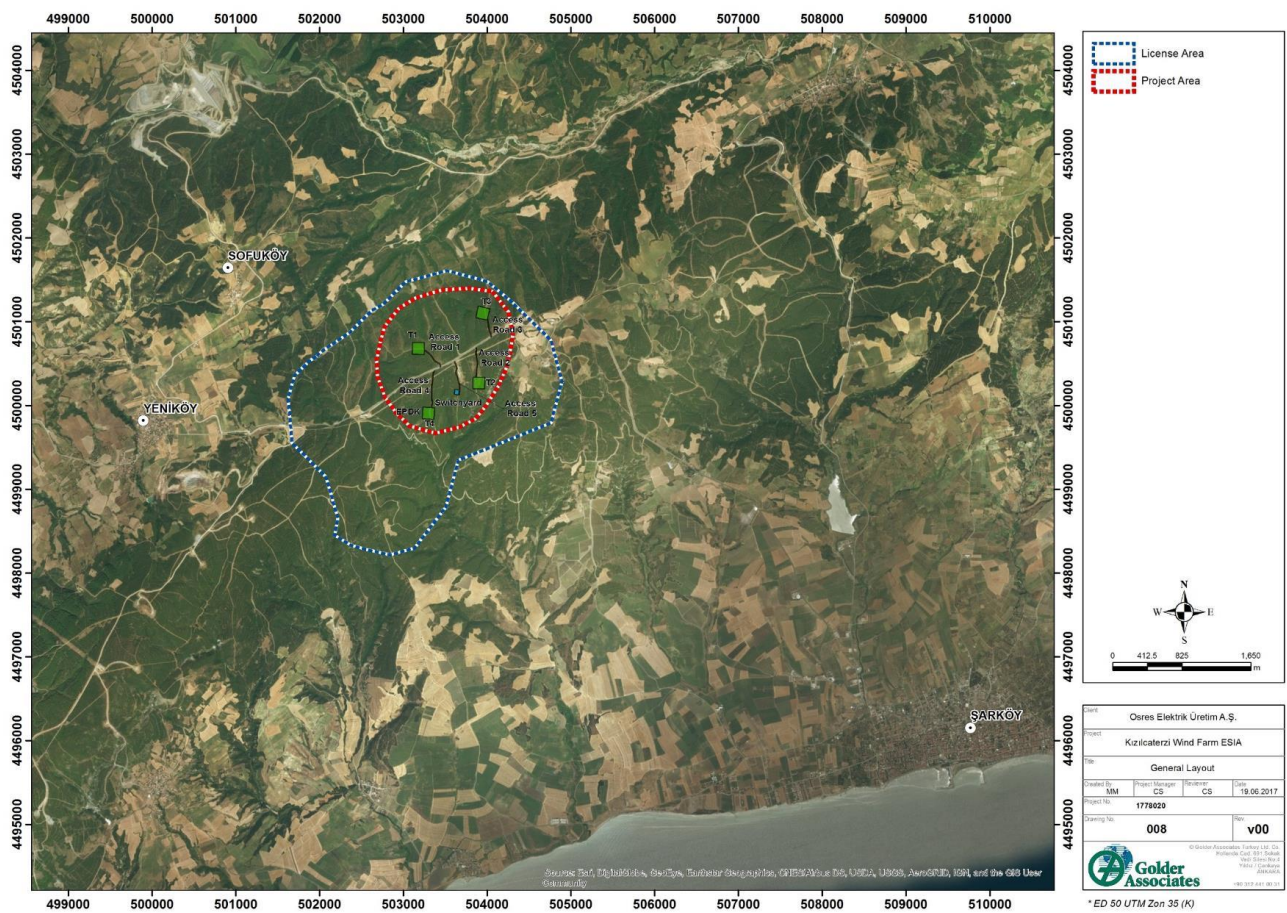


Figure 3: License and Project Area

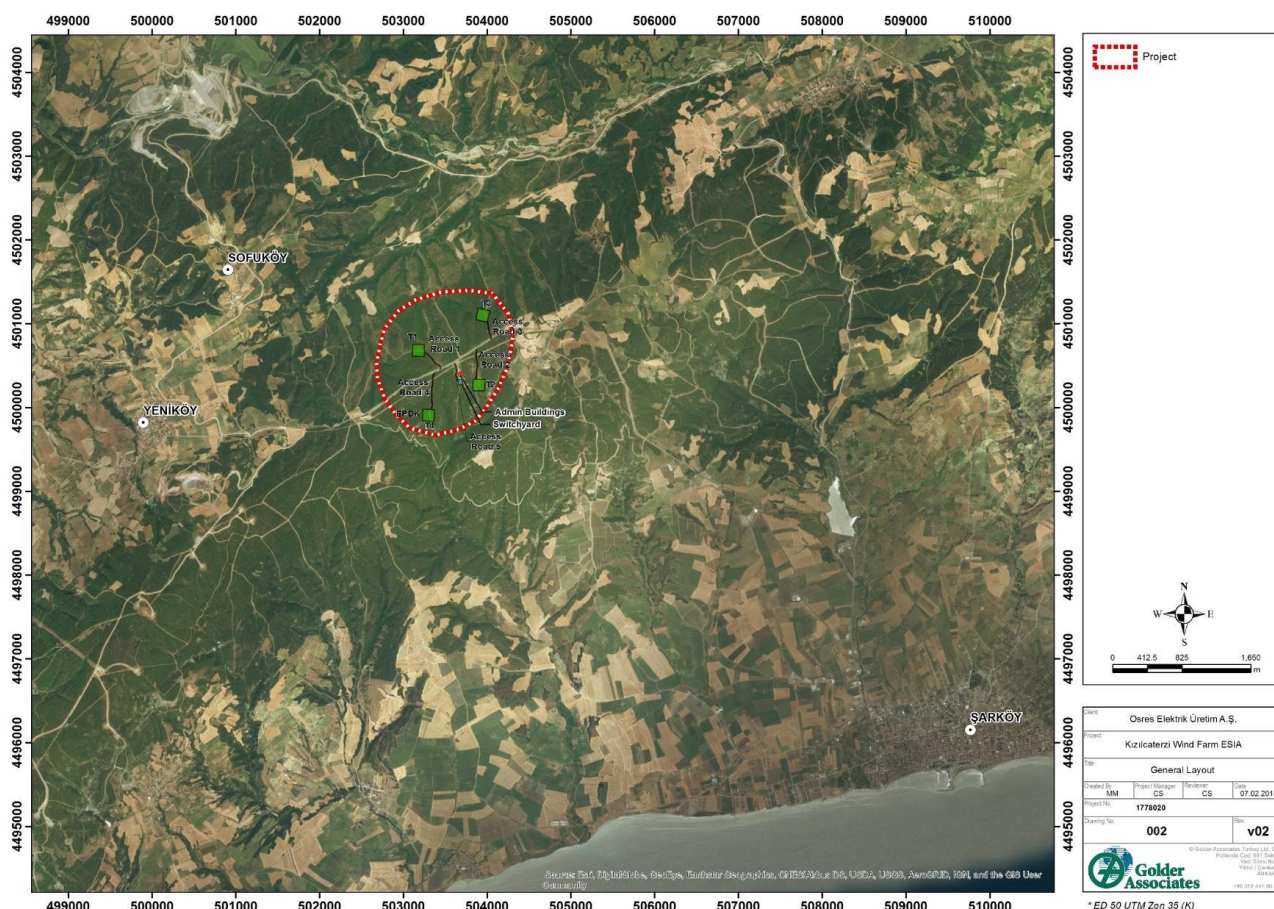


Figure 4: General Layout of Project

The Project area is located on the G18 section within the scope of the Trakya Sub-Region Ergene Basin 1/100,000 scaled revised Environmental Plan approved on 09.05.2013. The Project area is located on forest land.

2.3 Renewable Energy Generation Capacity of the Project

The installed power of the Project has been designed as $13.6 \text{ MW}_m/12 \text{ MW}_e$ with total of 4 turbines; functioning at 3 MW. The energy generation license was obtained on March 22nd, 2012, with license number EÜ/3741-2/2293.

The route of the Energy Transmission Line (ETL) has not been decided yet. Therefore, the powerline is not included within the entire scope of the ESIA. On the other hand, according to the Client, the starting and end point of the ETL is known. Therefore, this information is used superficially during the assessment of the biological components by combining the starting and the end point.

2.4 Project Description (Including Associated Facilities)

Kızılcaerzi Wind Farm will consist of 4 turbines with the total capacity of $13.6 \text{ MW}_m/12 \text{ MW}_e$. The model of the turbines will be GE 3.4-130 which is a three-bladed, upwind, horizontal-axis wind turbine with a rotor diameter of 130 meters. Technical specifications and performance data of the proposed turbine model is given in table below. Locally produced tower and blades will be used in the Project and the rest of the turbine parts will be supplied from Germany.

There will be 5 access roads (to the turbines and switchyard), a switchyard (which is the enclosed area for the starting point of the powerline) and an administrative building. The route of the Energy Transmission Line (ETL)

has not been decided yet. Therefore, the powerline is not included within the entire scope of this Report. On the other hand, according to the Client, the starting and end point of the ETL is known. Therefore, this information is used superficially during the assessment of the biological components by combining the starting and the end point.

Rotor

The regulation of the rotor speed is achieved by a combination of a blade pitch angle adjustment and generator/converter torque control. The rotor will spin in clockwise direction. The full blade pitch angle range is approximately 90 degrees which helps to accomplish aerodynamic braking of the rotor, thus reduces the rotor speed.

Blades

There will be three rotor blades on the GE 3.4-130 wind turbines. In order to optimize the noise emissions, it is possible to equip the rotor blades with Low-Noise-Trailing-Edges (LNTEs) at the pressure side of the blade's rear angle (below figure).



Figure 5: View of Rotor Blades

Blade Pitch Control System

The purpose the blade pitch control system is to regulate the speed of the turbine rotor when above rated wind speed. Independent back up is provided to drive each blade and shut down the wind turbine in case of a grid line outage or other fault. Blade pitch control system will be provided for all three blades.

Hub

Three rotor blades are connected to turbine main shaft by the hub and it directly mounted to the main shaft. It can be entered by one of the three hatches at the area close to the nacelle roof.

Gearbox

It is mounted on the wind turbine bedplate and designed to transmit torsional power between the low rpm turbine rotor and high rpm electric generator. The gearbox mounting is designed to reduce the vibration and noise transfer to the bedplate.

Bearings

The blade pitch bearing is designed to allow the blade to pitch about a span-side pitch axis.

Brake System

The blade pitch system is designed to act as the main braking system for the wind turbine.

Generator

Generator is mounted to the bedplate and designed to reduce vibration and noise transfer to the bedplate. It will be a doubly fed induction generator.

Gearbox/Generator Coupling

To protect the drive train from excessive torque loads, a special coupling including a torque limiting device is provided between the generator and gearbox output shaft.

Yaw System

A bearing that is located between the nacelle and tower facilitates yaw motion. The system contains an automatic yaw brake which engages when the yaw drive is not operating and prevents the yaw drives from being loaded due to the turbulent wind conditions.

Tower

The tower will be mounted on the top of a tabular steel tower (85 m, 110 m hub height). There will be; a door at the base of the tower for access, internal service platforms and interior lightning and ladder to access to the nacelle and also supports a fall arrest system.

Nacelle

It is the main component of the wind turbine generator. Access from the tower to the nacelle is through the bottom of the nacelle. Ventilation and illumination is provided. A hatch provides access to the blades and hub.

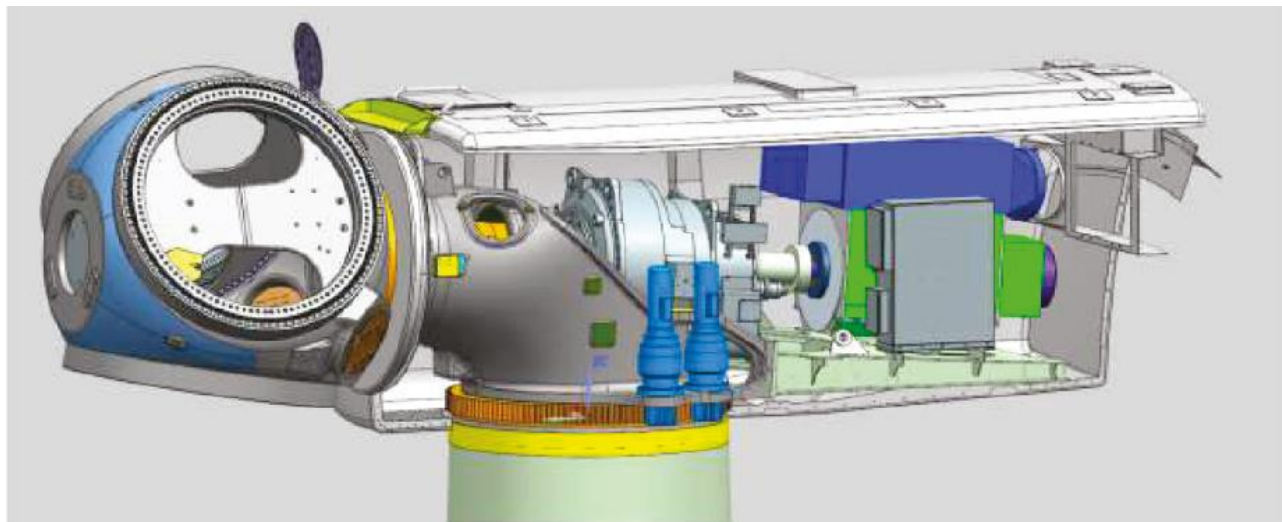


Figure 6: Wind Turbine Nacelle View with Hub Access Hatch Open

Wind Sensor and Lightning Hub

Wind sensor and lightning hub will be mounted on top of the nacelle housing. Access will be through the hatch in the nacelle.

Lightning Protection (According to IEC 61400-24 Level I)

Lightning protection will be mounted on each rotor blade.

Wind Turbine Control System

Wind turbine can be controlled locally. Control signals can also be sent from a remote computer via a Supervisory Control and Data Acquisition System (SCADA) with local lockout capability provided at the turbine controller. Emergency stop buttons will also be placed in the tower base for emergency cases.

Power Converter

The wind turbine uses a power converter system consisting of a converter on the rotor side, a DC intermediate circuit and a power inverter on the grid site.

Medium Voltage Transformer and Switch Gear

Medium voltage transformer and switch gear is used to connect each turbine to the collector

2.4.1 Construction Phase

The construction period of the Kızılcaerzi Project will consist of the following steps:

- Site preparation, mobilization and excavation works for turbines and access roads.
- Assembling of turbines
- Ground cabling

The construction period of the Kızılcaerzi Wind Farm Project is planned to be 6 months. There are already access roads to the turbine and switchyard locations. However, some extension works might be performed in case of need.

It is predicted that approximately 80 people will be employed during the construction phase of the Project where 60 of them will be in the construction team and 20 of them are in assembly team.

2.4.2 Commissioning/Operation Phase

The Operation period of the Project is 49 years.

Estimated number of employees to be employed during the operation phase is 10 people.

The maintenance process for turbines can be divided in two by planned and unplanned. All planned maintenance works are carried out by the suppliers. On the other hand, unplanned maintenance are carried out instantaneous malfunctions. Planned maintenance are carried out between 3rd – 6th months, 12th – 24th months and 48th months.

2.4.3 Decommissioning/Closure Phase

Decommissioning/closure will not occur for at least 49 years. After the completion of this period, turbines, machineries and equipment will be removed and the used land will be reclaimed. Vegetation of restored areas will be similar to surrounding natural vegetation.

3.0 MANAGEMENT OF ENVIRONMENTAL AND SOCIAL ISSUES

For the management of environmental and social issues, following mitigation measures will be implemented in the construction and operation phases of the Project.

Table 2: Summary of Project Management Strategy for Construction Phase

Main features of Current Situation	Potential impacts	Mitigation Measures
Geology and Seismology		
The project area is in 1 st degree earthquake zone.	Changes in the local morphology due to the earthworks and excavation during construction. Impacts of seismologic activities on the facilities.	Compliance of design with the provisions of the "Regulation on the Buildings to be Constructed on Earthquake Zones" (06.03.2007 O.G. No: 26454).
Soils		
The Project Area is considered a Greenfield. Sandstone, siltstone, shale have been observed as the dominant formations.	The top soil and lower soil removal. Occupation of land, increase of artificial land use and discharge of wastewater. Potential contamination of soil as a result of accidental spills, storage of hazardous material and waste at site.	Removed topsoil will be stored in an appropriate area in the Project Area, to be used for landscaping after the construction. Prevention of leaks and spills. Spill response arrangements.
Hydrogeology and Groundwater Quality		
The regional groundwater level is deeper than 20 m and no major pollution risk is foreseen.	Hydrogeological change and potential groundwater pollution due to uncontrolled release of contaminants onto the ground.	Prevention of leaks and spills.
Hydrology and Surface Water Quality		
No streams or any other natural surface water bodies were observed during the site visit within the Project Area. Among the dams in the region, the two that are in the close vicinity of the Project area are the Bostanlı Dam, which is located 4 km northeast; and the Değirmendere Dam, which is located 10 km north of the Project Area.	Surface water pollution. Sediment pollution.	Engineering and design practices will be in place for the collection and disposal of wastewater from all sources during construction and operation of the project.
Air Quality		

Main features of Current Situation	Potential impacts	Mitigation Measures
PM ₁₀ , settled dust and SO ₂ &NO ₂ measurement values are in compliance with Project standards.	Calculations on the estimated amount of air emissions during construction indicate no significant contribution to the ambient air quality.	Measures will be in place to minimise the air emissions during construction.
Noise		
Ambient noise levels are in compliant with the standards with the exception of night time limit (45 dBA) is exceeded at the points of N-1, N-4, N-5 and N-6.	Noise modelling shows the construction activities will not create additional noise values higher than the regulatory limit. As compared to the construction phase model results, operation phase noise level in the surroundings will be much lower and no exceedances in relation applicable standards are expected for the ambient noise levels.	Engineering controls. Limited construction works during night and weekends. During the operation, a monitoring programme will be in place.
Traffic		
The Project Site is located on D-120 (the asphalt road between Şarköy District Centre and Yeniköy) road. There will be 5 access roads (to the turbines and switchyard), a switchyard (which is the enclosed area for the starting point of the powerline) and an administrative building	During construction phase impacts will be mainly associated with the increased road traffic.	Scheduling of traffic to avoid peak hours on local roads. Adopting traffic control and operations devices and emphasizing safety aspects among project drivers. Regular maintenance of vehicles should be undertaken to ensure that vehicles are safe and emissions and noise are minimized.
Visual Impact		
<p>The project area is not located in any Protected Area and Internationally Recognized Area. The project area is not also located in the close vicinity of the residential areas and any tourism areas. Therefore, the sensitivity of the visual impacts is considered as low.</p> <p>The possible visual impact of the project during the operation phase will be the presence and view of the vertical structures and rotating blades. The visual effect of the proposed project are assessed by using ZVI (Zones of Visual Influence) tool of the windPRO software program.</p> <p>Visual impact is a subjective issue, a significant number of people in Turkey, who has been interact with the wind farms, thinks that wind farms are clean energy and view of the towers as a symbols of modern and civilized living. According to the social survey conducted for the project, there is not any negative opinion for potential visual of the turbines</p>		
Shadow Flicker		
Shadow flicker is one of the most important effect of the wind turbines to the sensitive receptors located within the close vicinity of the project area.		

Main features of Current Situation	Potential impacts	Mitigation Measures
<p>A specific software program “windPRO” is used for the assessment of the shadow flicker. Shadow is the windPRO calculation module that calculates how often and at which times of the day a specific neighbour or area will be affected by shadows generated by one or more wind turbines.</p> <p>According to the model results, point A (Kalpak Tarım) will have the maximum hours per year in a year which is 24:41 hours. This value is under the limit value of 30 hours per year.</p>		
Biological Components		
<p>the sensitivity of the terrestrial flora is considered to be low</p> <p>the sensitivity of the terrestrial fauna is considered to be low</p> <p>the sensitivity of the terrestrial habitat is considered to be low</p> <p>the sensitivity of the protected and internationally recognized areas is considered to be high. This component is not impacted by the proposed Project due to the 15 km distance.</p> <p>no critical habitats were identified within the local study area</p>		
Social Components		
<p>The project site is bounded by two settlements of Sofuköy and Yeniköy with different demographic but similar socioeconomics characteristics.</p>	<p>The need of workforce that can be considered a positive impact.</p> <p>Increased traffic and transportation requirements.</p> <p>Community health and safety concerns in relation to Project construction and operation.</p>	<p>A continuous stakeholder engagement process and grievance mechanism will be in place</p> <ul style="list-style-type: none"> to exchange information on the project with the local community and other stakeholder and to record and respond any complaints and concerns raised by the local community members and other stakeholders <p>Maximising of local employment and procurement in order to increase the positive socio-economic impact of the project on the local community.</p> <p>Coordination with the local community for the arrangements of accommodation and establishment of the construction camps.</p>

Table 3: Summary of Project Management Strategy for Operation Phase

Component	Potential Impact	Mitigation Measures
Noise	<p>■ No impact is expected based on the noise modelling results for operational activities (by using WindPRO)</p>	NA
Biodiversity	<p>■ Impacts on fauna components (Birds and bats)</p>	<p>Bird presence and activity will be monitored; Vantage Point Monitoring will be repeated two times a year for three months each time, during spring migration (March, April and May), and during autumn migration</p>

Component	Potential Impact	Mitigation Measures
		<p>(September, October and November) for a total of six months a year.</p> <p>Mortality monitoring will be repeated two times a year for three months each time, during spring migration (March, April and May), and during autumn migration (September, October and November) for a total of six months a year.</p> <p>For bats; "Transect Surveys" or "Automated/static surveys" will be repeated two times a year (between April and October).</p> <p>Mortality monitoring will be repeated two times a year (between April and October)</p>
Cultural Heritage	<ul style="list-style-type: none"> There are no identified cultural heritage at the Project Study area. 	<ul style="list-style-type: none"> Implementation of Cultural Heritage Management Plan (including Chance Find Procedure)
Social - Economical and Land Use	<ul style="list-style-type: none"> Positive impacts are expected both for local procurement and local employment. 	<ul style="list-style-type: none"> Prioritizing the local procurement and employment
Visual Impact	<ul style="list-style-type: none"> Visual impact assessment is conducted as part of the ESIA by using windPRO. No negative visual impact is expected. 	NA
Shadow Flicker and Blade/Ice Throw Assessment	<ul style="list-style-type: none"> No negative impact is expected based on the results of windPRO modelling program and calculation of minimum setback distance. 	<ul style="list-style-type: none"> The design parameters should be implemented.
Community Health and Safety	<ul style="list-style-type: none"> A failure of a rotor blade can result in throwing. Unauthorized access to turbines Shadow Flicker and Blade/Ice Throw Impact (explained above). 	<ul style="list-style-type: none"> Regular maintenance of the turbines.
Occupational Health & Safety	<ul style="list-style-type: none"> During operation the impacts will likely be limited to the maintenance of the turbines. 	<ul style="list-style-type: none"> Implementation of Occupational H&S Policy/Plan/Procedures/Instructions, Emergency Response Plan, Traffic Management Plan Training and supervision Emergency drills Accident/Incident Reporting and investigations Suggestion/Complaints reporting Regular site inspections

The Environmental and Social Management System (ESMS) is required to ensure that the Project:

- complies with all applicable Turkish legislation as well as relevant IFC guidelines provided in ESIA report;
- implements Good International Industry Practices (GIIP) to minimize potential environmental and social impacts during the construction, operation and decommissioning phases;
- is executed in compliance with the commitments addressed in this report for the minimization of potential environmental and social impacts;
- works in accordance with high standards of safety;
- cares for the protection of own employees and public;
- promotes its policies through training, supervision, regular reviews and consultation;
- generates local socio-economic benefits by using local and regional labour forces;
- engages and communicates with the local community and other stakeholders through a stakeholder engagement programme.

The minimum requirements of an ESMS have been defined and will be established for the project in order to mitigate the risks associated with;

- Environmental aspects
- Labour Issues
- Community Health & Safety aspects
- Stakeholder management and social aspects
- Waste Management

A basic framework of ESMS has been described at this stage of the Project for the general management issues and will be further developed as the project progresses.

As a result of the Environmental and Social Assessment Study the following conclusions have been driven:

- 1) Continuous stakeholder engagement is necessary to manage the social risks of the project.
- 2) The project will develop an Environmental and Social Management System in line with the minimum requirements that are defined as part of the ESIA study.

4.0 STAKEHOLDER ENGAGEMENT

A specific Stakeholder Engagement Plan has been prepared for the Project.

As a part of the engagement activities, a public participation meeting was held on 25th of September 2012 by Osres in the teahouse in Yeniköy Quarter in Tekirdağ. Osres relayed information about the Project to the local communities within the scope of Gold Standard. Participants did not raise any major concern during this meeting.

As part of the ESIA studies, several consultation meetings were held during baseline data collection studies. between 20th and 27th of April 2017. During these activities, deep interviews (DI), community level surveys (CLS) and focus group discussions (FGD) were held. Meetings held as part of the social baseline data collection activities are listed in ESIA Report in detail.

Osres take the role for project development and will manage stakeholder engagement. Their primary tasks are to coordinate stakeholder engagement activities and to support the specialist consultants during their

engagement during the baseline studies and impact assessment. Key specialist consultants are Golder Associates, responsible for international ESIA report.

While many Osres staff interact with external stakeholders, Osres will take the role for documenting these interactions, and in particular, recording key meetings and consistent issues. The following are core tasks of Osres:

- Incorporate all stakeholder engagement activities into the overall environmental and social management systems;
- Develop an internal system to communicate progress and results of stakeholder engagement to the senior management and staff members;
- Coordination of all verbal and written communication from stakeholders, particularly comments solicited from formal grievances;
- Management and coordination of external messages,
- Frequent coordination with external consultants and contractors to provide technical, environmental and other studies are summarised appropriately for all stakeholders;

Contact details to liaise with Osres are indicated below:

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Phone Number: +90 0530 387 12 78

Contact Person: Adem Eldemir

Email Address: adem.eldemir @finaenerji.com

Corporate website: <http://www.finaenerji.com/?dil=>

5.0 GRIEVANCE MECHANISM

A Grievance Mechanism has been set up for communities and individuals to formally communicate their concerns, complaints and grievances to the company and facilitate resolutions that are mutually acceptable by the parties.

The Grievance Mechanism is a management procedure through which communities and individuals affected by Osres' activities can formally communicate their concerns, complaints and grievances to the company and facilitate resolutions that are mutually acceptable by the parties, within a reasonable timeframe. The grievance mechanism is a management tool designed to help address stakeholder concerns and facilitate a trustworthy and constructive relationship.

A Grievance Mechanism is followed up by Osres to manage the community and employee concerns through active and transparent engagement with stakeholders. As part of this mechanism:

- a direct line will be set up and a Complaint Register Form ("CRF") (an example register form is presented below) will be prepared for the complaints

Management of the complaints will be followed up through the system specified below.

- Receiving and registering of the complaints – 2 business days
- Assessment and investigation of the complaint – 10 business days
- Resolution of the complaint
- Response to the complainant within – 30 business days

■ Close out of the complaint

Grievances may be submitted in writing or verbally through staff of the Project to Osres that will put the grievance in writing for management purposes.

Written grievances may be submitted with the CRP (or by including the following information in a letter or e-mail:

- Name;
- Organisation and position, if relevant;
- Address;
- Telephone/Fax and e-mail;
- Most effective means to send a response; and
- Details of the grievance (any important details; date of the incident, location, etc.)

Table 4: Complaint Register Form

Name	
Organisation/Position	
Address:	Telephone/Fax:
	E-mail:
Most effective means to send a response:	
Details of the grievance (any important details; date of incident, location, etc.):	

Signature Page

Golder Associates (Turkey) Ltd. ŞTI

İlgin Atalar
Environmental Engineer/HS Leader

Caner Şahin
Project Manager

IA/CS

Registered in Turkey Registration No. 53/3069

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