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KIZILCATERZI WIND FARM PROJECT

STAKEHOLDER ENGAGEMENT PLAN

Submitted to:
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Distribution:

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ACRONYMS AND ABBREVIATIONS

Acronym and Abbreviation	Definition
CLO	Community Liaison Officer
CRF	Complaint Register Form
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
EU	European Union
IFC	International Finance Corporation
MoEU	Ministry of Environment and Urbanisation
NGO	Non-Governmental Organization
PAP	Project Affected People
PCDP	Public Consultation and Disclosure Plan
SEP	Stakeholder Engagement Plan
MoLSS	Ministry of Labour and Social Security



1.0 INTRODUCTION

This Stakeholder Engagement Plan ("SEP") document has been prepared by Golder Associates Ltd. Turkey (referred as "Golder") for Kızılcaerzi Wind Farm Project ("Project"), represented by Osres Elektrik Üretim A.Ş. (Osres). Osres will take the role for implementing the SEP and has been involved in developing the document with assistance from its consultants.

The Project, consisting of 4 turbines with the total capacity of 12 MW, is located in Şarköy District of Tekirdağ. The Project had several design revisions previously which are explained chronologically 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 again 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. 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. Osres asked about the validity of EIA 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 the EIA decision is still valid.

1.1 Objectives of the SEP

The overall objective of the SEP is to explain how the Osres is planning to engage with stakeholders through the course of the Project. The stakeholder engagement is a key activity within projects such as the present one, because it creates an open communication channel with stakeholders, it allows stakeholders to understand significant impacts of the Project and helps the Sponsor address local expectations and incorporate feedback in the project design, overall fostering the achievement of a sound and comprehensive project. SEP presents a plan for consultation designed to:

- Provide timely information about the project and its potential impacts to project affected people ("PAP") and other stakeholders;
- Provide opportunities to those groups to voice their opinions and concerns in a way that is most appropriate to their circumstances; and
- Provide an opportunity for feedback to, and discussion with, those settlements concerning measures proposed.

The SEP aims to;

- Identify key stakeholders and endeavours to establish there are adequate mechanisms for stakeholder feedback and information sharing;



- Provide an outline for consultation at the local, national and international levels, starting at the Project planning stage, and continuing throughout construction, operation and decommissioning of the project;
- Establishes issues raised by key stakeholders are addressed in the Environmental and Social Impact Assessment ("ESIA") as well as in project decision-making and design phase; and
- Outline a grievance mechanism for all stakeholders.

The SEP is a living document that will be revised during the development of the Project. This version of the SEP is a planning and management document, which explains stakeholder engagement activities, implementations during the ESIA process, and throughout the entire lifespan of the Project (construction, operation and decommissioning phases). Subsequently, the SEP will be revised to reflect a list of planned meetings and other stakeholder engagement activities. As part of the impact assessment, which aims to measure and predict actual impacts, stakeholder engagement attempts to capture the perceived impacts of the project.

This SEP presents a plan for stakeholder consultation that includes the following key elements:

- **INFORM:** provide most accurate, relevant, timely and culturally appropriate information to stakeholders about the Project its predicted impacts and benefits, and the ESIA process;
- **ENGAGE:** provide opportunities for stakeholders to express their opinions and concerns about the Project, and to seek broad stakeholder support for the Project and impact management;
- **UNDERSTAND:** enable the Project team to understand the concerns and priorities of stakeholders;
- **REVIEW:** incorporate these concerns and priorities into the design, construction and operation of the Kizilcaterzi Wind Farm Project; and
- **INFORM:** provide feedback to stakeholders as the project develops so that the consultation process continues.

It is critical that collaboration, partnership and learning are the main structural functions of the engagement process. Stakeholder feedback is a source of valuable information that will be integrated into core business and strategic process.

All stakeholders will be invited to review and provide feedback on Project activities. Such feedback will be taken into consideration in future revisions of this SEP.

1.2 Brief Project Description

Kızılcaerzi Wind Farm will consist of 4 turbines with the total capacity of 13.6 MW_m/12 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, hub height of 110 m and maximum speed of 82.4 m/s.

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) and the location of the administrative building has not been decided yet.

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.

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 and within the long-range protection zone of Şarköy Pond and medium-range protection zone of Çokal Dam.

The construction period is 6 months and operation will last for 49 years.



1.3 Glossary of Terms

The following definitions are used in the SEP. Stakeholder engagement will be integrated into the overall environmental and social appraisal and requires consideration of other terms related to the ESIA, environmental and social management and social investment as it relates to external relations. Hence, common terminology is used for:

Environmental and Social Baseline: A component of an ESIA processes undertaken to develop an understanding of the existing environmental and socio-economic conditions in the areas that may be affected by a project. Baseline studies provide a basis for analysis of potential positive and negative impacts of a project in the ESIA and, as possible, provides information for monitoring and measuring impact throughout implementation of the Environmental and Social Management Plan ("ESMP") (see below).

Environmental and Social Management Plan ("ESMP"): Component of the ESIA that provides an action plan or series of plans for implementation of mitigation measures required to avoid or minimise adverse impacts and to optimise beneficial effects of a project. An ESMP also includes information on management, monitoring and reporting related to environmental and social performance.

Project Affected People ("PAP"): Individuals, workers, groups or local communities which are or could be affected by the project, directly or indirectly, including through cumulative impacts. Emphasis should be placed on those who are directly and adversely affected,

Scoping: Scoping is the process of determining the content and extent of the matters that will be studied during the baseline and ESIA. The scoping process will vary depending on: the proximity of surrounding communities, legal requirements; the capacity of authorities; and the specifics of the project. Scoping is sometimes called the "preliminary ESIA", but does not include the level of detail for a complete ESIA.

Stakeholder: Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively (IFC, 2012).

Stakeholder Engagement: Stakeholder engagement is an ongoing process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to Affected Communities. The nature, frequency, and level of effort of stakeholder engagement may vary considerably and will be commensurate with the project's risks and adverse impacts, and the project's phase of development. (IFC, 2012).

Stakeholder Engagement Plan ("SEP"): It is the stakeholder engagement planning document, often called a Public Consultation and Disclosure Plan ("PCDP"), is a key component required for verifying compliance with international standards on public disclosure.

2.0 LEGISLATIONS AND INTERNATIONAL STANDARDS

Osres intends to fund the Project partly with loans from financing institutions and has committed to undertake an ESIA compliant with national and international standards and best practices. The Stakeholder Engagement Process of the Project will conform to:

- National Legislations;
- Guidelines established by international financial institutions, specifically the IFC and EBRD; and
- European Commission Requirements,

The main requirements are set out in the following sections.

2.1 National Legislation

The legislation related to stakeholder engagement and consultation component of the project is described below.



2.1.1 The Constitution of the Republic Of Turkey

“The Constitution of the Republic of Turkey” is the main document related to the stakeholder engagement component of the project. The articles of the Constitution related to engagement issues are listed below:

VII. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal his thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of his thoughts and opinions.

VIII. Freedom of Expression and Dissemination of Thought

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or in pictures or through other media, individually or collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities.

VIII. Health, the Environment and Housing

A. Health Services and Conservation of the Environment

ARTICLE 56. Everyone has the right to live in a healthy, balanced environment.

It is the duty of the state and citizens to improve the natural environment, and to prevent environmental pollution.

XI. Conservation of Historical, Cultural and Natural Wealth

ARTICLE 63. The state shall ensure the conservation of the historical, cultural and natural assets and wealth, and shall take supportive and promotive measures towards that end.

VII. Right of Petition

ARTICLE 74. Citizens and foreigners resident considering the principle of reciprocity have the right to apply in writing to the competent authorities and to the Turkish Grand National Assembly with regard to the requests and complaints concerning themselves or the public.

2.1.2 Civil Law

Real property rights and restrictions are defined under relevant section of Civil Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and its requirements will be met in all phases of the Project.

2.1.3 Law on the Right to Information

Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. Everyone has right to information on the activities of the public institutions and the professional organisations, which qualify as public institutions.

2.1.4 Law on the Use of Right to Petition

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities with regard to the requests and complaints concerning themselves or the public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreigners resident have this right considering the principle of reciprocity and drawing up petitions in Turkish.



2.1.5 Environmental Law

In addition to the legislation explained above, the fundamental law in Turkish Environmental Legislation is the Environmental Law No.2872 (Issued on 11.08.1983, Official Gazette No.18132, amended by Law No. 5491).

2.2 International Standards

European Commission

While Turkey is not bound by European legislation, Osres will seek to develop stakeholder engagement in compliance with EU environmental policy.

ESIA is a key instrument of EU environmental policy. Since the inception of the first EIA Directive in 1985 (Directive 85/337/EEC) both the law and the practice of EIA have evolved. An amending Directive was published in 1997 (Directive 97/11/EC).

The primary aspects related to stakeholder engagement are linked to the EIA Directive (85/337/EEC), which includes amendments that align with the Aarhus Convention on Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention).

The Aarhus Convention focuses on three key areas:

Access to information: ensures that the public can have a system whereby one can request and receive information, thus allowing for informed participation;

Public participation; provides for public participation early in decision-making on activities that can have significant environmental impact; and

Access to justice: ensures that the public has legal mechanisms available to review potential violations of access to information and public participation provisions.

International Finance Corporation and European Bank for Reconstruction and Development

The IFC and EBRD requirements for project information disclosure are stringent and exceed the requirements of the EU (as defined by the Aarhus Convention).

The IFC Performance Standards (as stipulated in specifically in Performance Standard 1), the basis for the Equator Principle Financial Institutions, stress that public consultation should be started early in project development and that engagement with interested parties at every stage should be:

- “Free” (free of intimidation or coercion);
- “Prior” (timely disclosure of information); and
- “Informed” (relevant, understandable and accessible information).

Specific requirements for the IFC include the following:

- Stakeholder Analysis and Engagement Planning
- Disclosure of Information
- Consultation
- Informed Consultation and Participation
- External Communications
- Grievance Mechanism for Affected Communities
- Ongoing Reporting to Affected Communities

Similarly, EBRD requires as stipulated in Environment and Social Policy, 2014 and specifically Performance Requirement (PR) 10:



- Evidence that stakeholder engagement has been free of manipulation, interference, coercion, and intimidation, and that it has been conducted on the basis of timely, relevant, understandable and accessible information;
- Stakeholder identification of individuals or groups who are i) are affected or likely to be affected by the project (affected-parties) or ii) may have an interest in the project (other interested-parties);
- Disclosure of environmental and social action plans or mitigation measures;
- Documentation of the public consultation process;
- Provision of ESIA documents in the public domain; and
- Development of grievance mechanisms for all segments of affected communities that is available at no cost and guarantees using the mechanism will not cause retribution (EBRD, 2014).
- Assessment of project impacts;
- Grievance procedures and dispute resolution; and
- Methods and mechanisms for monitoring and evaluation and implementing corrective actions.

3.0 STAKEHOLDER IDENTIFICATION

Stakeholder identification is a key step in managing the overall Stakeholder Engagement process. It reduces the risk that a narrow stakeholder group can dominate the consultation process.

Stakeholders are defined as individuals or groups who can affect, or are affected by, or have a legitimate interest in the Project results and performance. Some stakeholders are obvious, such as government authorities responsible for permitting, local communities adjacent to the Project and other PAP. The preliminary stakeholder identification intends to include other groups, organisations and individuals that may not appear to be directly involved. The health professionals and educators, for example, may not be directly involved in the Project development, but are familiar with the existing community and socio-economic dynamics and can help improve the quality of impact analysis. Such consultation is combined with the baseline information collection. Consideration of feedback from such stakeholders helps to align mitigation and social investment with existing initiatives and the actual socio-economic needs.

Expanding the stakeholder identification beyond government and local residents increases the likelihood that a wide representation of interests and opinions will be a priority in the development of the Project.

The following list is the categorisation of stakeholders that should be considered throughout the life of the Project.

- a) Governmental authorities at the national, regional and local levels;
- b) Multi-national and international organizations (EBRD, IFC, EU);
- c) Non-commercial, non-governmental and public organisations particularly those with an interest in environmental and social issues at the international, national, regional and local levels;
- d) Interest groups, such as universities and their foundations, cooperatives, local business establishments, business associations, chambers of commerce and others;
- e) PAPs including non-organised groups with particular areas of interest or that may be vulnerable (i.e., elderly, people with disabilities, ethnic minorities, etc.). PAPs include land owners and residents that may use communal land;
- f) Project employees;
- g) Media ; and
- h) Directly affected community members (living and working nearby the Project area etc.)



In order to develop an effective interaction with stakeholders, it is necessary to determine the stakeholders and understand their priorities and objectives in relation to the Project. By classifying stakeholders, it becomes possible to develop a plan that is tailored to the needs of different stakeholder groups. Having an understanding of the connections of a stakeholder group to the Project helps to identify the key objectives of any engagement. The initial stakeholder identification for the Project based on the project knowledge and common literature are illustrated as the stakeholder list given in Appendix A.

4.0 OVERVIEW OF PREVIOUS ENGAGEMENT

Engagement with local authorities started with the initial Project design and Environmental Impact Assessment Process in 2010 and continued together with the revisions of 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. No major concern was raised by the participants during this meeting. Picture taken during the meeting is given below.



Figure 1: Public Participation Meeting, Yeniköy Quarter

5.0 STAKEHOLDER ENGAGEMENT PROGRAM

5.1 Integration with ESIA

The results of stakeholder engagement are integrated into the specialist environmental and social baseline studies undertaken for the ESIA. Stakeholder issues are considered in the ESIA and in the Project planning and design.

Stakeholder engagement during the ESIA process include consultation meetings conducted with PAPs, district governmental and non-governmental organisations while collecting baseline data (Section 5.2.2).

Stakeholder engagement is an underlying process that continues throughout the ESIA and beyond. The various phases of the ESIA depicted in the Figure 2 below largely correspond to the first two stages described below, but it should be noted that the stakeholder engagement will continue into the construction and operations stages. Though there will be less activities and intensity of engagement during operation, stakeholder engagement will be a Project-long process.

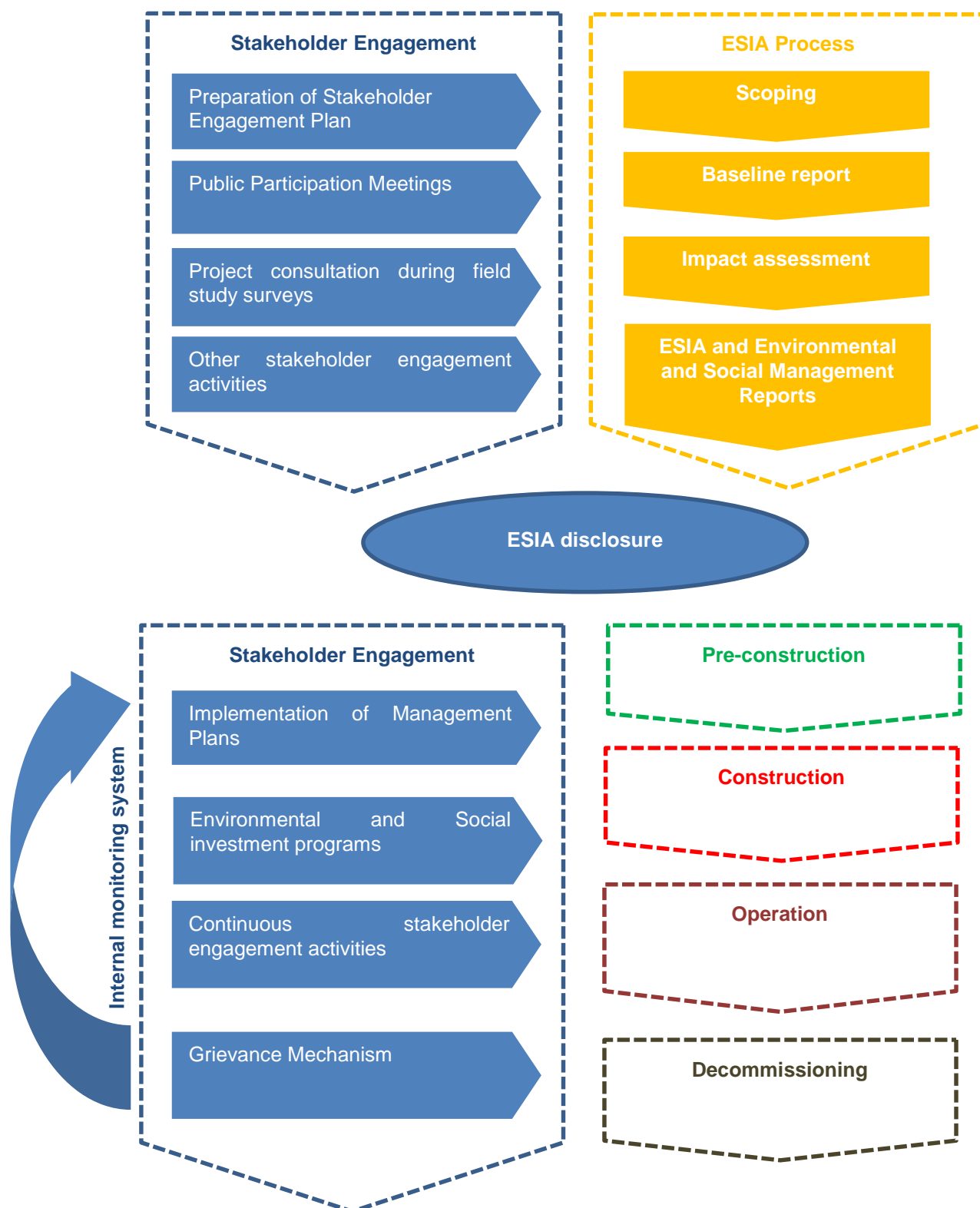


Figure 2: Diagram of the ESIA process and relationship with Stakeholder Engagement



5.2 Stages and Associated Engagement Activities

Stakeholder engagement is a continuous process that began prior to the development of this SEP and will continue through the life of the Project until decommissioning. The most active period of engagement will be during the Project development and ESIA process, when stakeholder inputs will be critical design the project in a way that minimises impact on the environment and communities near project.

For planning purposes, stakeholder engagement is organised in four stages:

- Stage 1: Scoping and baseline data collection
- Stage 3: Construction and Operations
- Stage 4: Decommissioning and closure

5.2.1 Methods and Activities

The following section reports the methods and activities that will be used and identifies how they will be used in the different phases of the process.

Consultation Meetings: Although Osres does not need to carry out the Public Participation Meeting according to the National EIA Regulation, as the owner of the Project, Osres organised public participation meeting within the scope of the Gold Standard in September 2012. As part of the ESIA, consultation meetings were held with Project Affected People and local authorities in April 2017.

Letters: Formal written correspondence is used by Osres staff and specialist consultants as part of official permitting requirements for documentation.

Media advertisements: Invitations to public participation meeting was issued in newspaper, as appropriate.

Project Explanatory Materials: It is a communication tool that was presented to stakeholders during consultation meetings including Project location Map.

Corporate website: The corporate website will provide announcements, basic project info and contact details for requesting more information.

Grievance mechanism: Procedures for collecting and resolving grievances is an important method that will be used throughout the project. The submission of grievances will be encouraged by all staff who have contact with external stakeholders.

Direct Line: A direct line will be available for any stakeholder to use. The direct line is meant to give stakeholders easy access to the company.

5.2.2 Stage 1: Scoping and baseline data collection

The purpose of stakeholder engagement during the pre-construction phase is to make sure all stakeholder issues, questions and concerns are sufficiently considered in Project design and in the development of baseline studies to be used in impact analysis. At this time, some of the activities have already been undertaken as part of the pre-construction period, which sought to characterise the project that minimise impact in consideration of scientific, technical, environmental and socio-economic context.

As part of the ESIA, Golder conducted social baseline data collection activities at project site 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 below:

- DI with Chief of Forest Management
- DI with Agricultural Engineers of District Directorate of Food, Agriculture and Husbandry
- DI with Owner of Ch. Kalpak Agricultural products limited company (Kalpak Agricultural Products Co. Ltd.)



- DI with Land Registry Representative
- DI with Directorate of Reconstruction (Municipality)
- DI with head of Şarköy Environment and Nature Conservation Association (together with two board members)
- CLS in Sofuköy
- FGD with Women in Sofuköy
- FGD with Men in Sofuköy
- FGD with Women in Yebiköy
- FGD with Men in Yeniköy
- CLS in Yeniköy

Questionnaires used during these meetings are given in Appendix B.

The common concerns raised by the stakeholders during the focus group meetings and interviews;

- The Project access road is used by students and villagers frequently. Concerns on the impact on the access road integrity, traffic load and potential high speeds of the heavy vehicles were raised by Yeniköy and Sofuköy residents.
- Yeniköy and Sofuköy residents raised their concern about potential power cuts during the construction period.
- Employment opportunities were raised by Yeniköy and Sofuköy representatives.
- Project site is used as pastureland by Sofuköy residents and concern about the potential damage to the livestock was raised by Sofuköy representatives. This issue was also raised during the interview conducted with the District Directorate of Food, Agriculture and Husbandry. Potential impact on birds and limitations on the collection of forest products such as mushrooms was also raised by the representative of the District Directorate of Food, Agriculture and Husbandry.
- Sofuköy representatives raised their concerns about a loss of value in their land if energy transmission line (ETL) passes by their land which might be caused by the problems such as electric shocks, noise pollution and lands being unable for cultivation. They also would like to know potential health impacts of ETL. For time being, the route of the ETL is not accurate. According to the Client, the route of the ETL will not cross the Sofuköy.
- Sofuköy representatives raised their concern about a potential inflow in their village due to workers accommodation.
- Sofuköy residents raised their concern about dust which can impact their houses and vineyards and Sofuköy male residents stated that although it is not very disturbing, turbine noise can impact the village at night time.
- The owner of the Kalpak Vineyards has concerns about the potential noise impacts of wind turbines during operation period.
- Şarköy Environment and Nature Conservation Association focused on the importance of ongoing consultation with all stakeholders and grievance mechanism. Concern about chopping of trees in order to expand the roads, which are going to be used for the transportation of the turbines during the construction phase was also raised during the meeting.

Pictures taken during these consultations are given below.



Figure 3: Meeting held with Yeniköy male residents



Figure 4: Meeting held with Chief of Forest Management



Figure 5: Meeting held with the owner of the Kalpak Vineyards



Figure 6: Meeting held with Sofuköy female residents

5.2.3 Stage 3: Construction and Operations

The stakeholder engagement during construction phase will focus on providing information on project progress and assuring community and worker health and safety and will aim to maintain links with all stakeholders to endeavour to ensure that impact mitigation is being implemented as planned.

Construction phase engagement will include posting of appropriate public health and safety information such as signs barring access to the construction site. In this phase the grievance mechanism will be in place through posting contact email addresses and phone numbers should any issues and complaints from public arise and need to be responded.



The objective of stakeholder engagement during the operations phase is to maintain links with all stakeholders to endeavour to ensure that impact mitigation is being implemented as planned. The frequency of stakeholder engagement will diminish as the Project transitions from construction to operations, but key methods such as the maintenance of the grievance mechanism will be used to identify and solve any impacts or problems that were not foreseen by the ESIA and associated management planning process.

The operation phase is the longest stage of the Project and will continue for 49 years and grievance mechanism will continue to be implemented throughout the Project's operation phase.

5.2.4 Stage 4: Decommissioning

The objective of stakeholder engagement during the decommissioning phase is to reduce the impacts related to closure, especially any environmental legacy issues.

Decommissioning will be held after 49 years of operation. The relevant stakeholder engagement activities for decommissioning will be organised by Osres in line with this plan.

6.0 ROLES AND RESPONSIBILITIES

Kızılcaerzi Wind Farm Project is planned to be undertaken by Osres Elektrik Üretim A.Ş.

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:

Address: Kısıklı Cad. Sarkuysan Ak İş Merkezi, No:4 Kat:1 A-Blok P.K.34662 Altunizade Üsküdar / İSTANBUL

Phone Number: +90 0530 387 12 78

Contact Person: Adem Eldemir

Email Address: adem.eldemir @finaenerji.com

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

7.0 GRIEVANCE MECHANISM

7.1 Purpose and Scope

The purpose of a grievance mechanism is to demonstrate responsiveness to stakeholder needs. A clear and widely publicised grievance mechanism improves stakeholder management by ensuring the



grievances are documented in writing and clearly understood. All stakeholders are encouraged to submit written grievances and should be reassured that written submissions will not be used in any way to intimidate those submitting the complaints.

Key elements of a grievance mechanism include:

- Clear instructions on how grievances are submitted and handled after submission, including a minimum period that a stakeholder must wait to receive a reply; and
- Alternatives for submitting a grievance in person to a staff member if a stakeholder is not able to or comfortable submitting a grievance in writing.

7.2 Responsibilities

Osres will take the role for coordination of stakeholder engagement activities and the management of the grievance procedure. Osres staff do not have the authority to resolve grievances, but rather works with a team of managers to collect accurate information about a given issue, to share it with appropriate senior management, and to communicate the resolution back to the person submitting the grievance.

The Community Relation Officer/Community Relation Assistant will be responsible of grievance mechanism. This mechanism will also include Project workers.

7.3 Procedure

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) is shown 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.)



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.):		



8.0 MONITORING, EVALUATION AND REPORTING

A process of establishing monitoring criteria is in an initial phase of development. The results to be analysed will provide background for planning better initiatives for the implementation and closure of the project phases.

Throughout the project life, Osres will maintain communication channels with relevant stakeholders as identified. Any additional stakeholders identified during the life of the Project will also be added to the stakeholder list and communication with them will be initiated. In case of significant changes or updates regarding the project, environmental and social issues will continue to be addressed and reported to the stakeholders. Improvements, upgrades and all environmental and social issues will be timely communicated via the methods outlined above.

The SEP will be updated periodically and upon major project changes. Updates will provide brief summaries of issues, concerns and questions raised during the previous year, as well as information on any changes between planned activities and the activities and events actually held.

Results of grievances will be summarised on an annual basis to demonstrate the types of issues managed in the process, as well as the number of grievances received, closed and number remaining open. Results will also include the number of grievances that were not solved through internal procedures and that may have included third party or legal resolution.

All stakeholders should be confident that reporting on grievances will protect confidentiality.

As explained throughout the SEP, stakeholder engagement is an underlying process that informs the on-going environmental and social management processes. The SEP will regularly list environmental and social reports that have been prepared and disclosed to the public. This process will be overseen by Osres and Community Relation Officers, who will be appointed before the construction phase begins.

The reporting commitments related to stakeholder engagement will take place during the periodic disclosure of environmental and social performance information. This reporting will take place at least one time year.



9.0 REFERENCES

EBRD, 2014. Environmental and Social Policy. London, UK.

IFC, 2007. Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets. Washington, D.C., USA.

IFC, 2012. Performance Standards on Environmental and Social Sustainability. Washington, D.C., USA.



Report Signature Page

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APPENDIX A

Preliminary Stakeholder List



KIZILCATERZI WIND FARM PROJECT - SEP

Table 2 Stakeholder List

Level	Organization	Relation to the Project
Governmental Organizations		
National	Ministry of Environment and Urbanisation ("MoEU"), General Directorate of EIA, Permit and Audit	MoEU has regulatory functions relating to the Project such as the EIA permitting and environmental permitting issues
	MoEU, General Directorate of Environmental Management	
	MoEU, General Directorate of Spatial Planning	
	MoEU, General Directorate of Land Registry and Cadastre	
	MoEU, General Directorate of Protection of Natural Assets	
	Ministry of Labour and Social Security ("MoLSS"), General Directorate of Labour	MoLSS may have specific remarks on labour and working conditions, health and safety of the healthcare personal.
	MoLSS, General Directorate of Occupational Health and Safety	
	MoLSS, Social Security Institution	
	Ministry of Forestry and Water Affairs, General Directorate for State Hydraulic Works	The Institution provide remarks on the location of the Project and its potential impacts on the surrounding water bodies, dams. The Institution has regulatory functions relating to the groundwater usage permitting.
	Ministry of Forestry and Water Affairs, General Directorate of Meteorology	The Institution may have specific remarks on impact of the project on the operation of the systems belong to the institution.
	General Directorate of State Airport Operations	General Directorate of State Airport Operations may provide remarks on the location of the project and its potential impacts on the performance of the electronical systems around the Project area.
	Ministry of Energy and Natural Resources, General Directorate of Mineral Research and Exploration	The Institution may provide remarks about the impacts of the Project on the institution's works.
	The Ministry of Transport, Maritime Affairs and Communications, Directorate General of Infrastructure Investments	The Institutions may provide remarks about the impacts of the Project on the Institutions' works.
Regional	Directorate General of State Railways, 1 st Regional Directorate	The Institutions may provide remarks about the impacts of the Project on the Institutions' works.
	Turkish Electricity Transmission Corporation, 20th Regional Directorate	The Institutions may provide remarks about the impacts of the Project on the Institutions' works.
	Ministry of Defence, Construction and Real Estate Regional Directorate	The Institution may provide remarks on the existence of military areas within the Project area and potential impacts.
	Ministry of Forestry and Water Affairs, 1st Regional Directorate	The Institution may provide remarks on the existence of national park, natural park, wildlife protection and improvement areas and endemic species.
Provincial	The Governorship of Tekirdağ	The governorship is the highest authority in the province representing national government.



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Level	Organization	Relation to the Project
	The Greater Municipality of Tekirdağ	The municipality and its relevant departments will have responsibilities relevant to the Project.
	Tekirdağ Provincial Directorate of Science, Industry and Technology	The Institutions may provide remarks about the impacts of the Project on the Institutions' works.
	Tekirdağ Provincial Directorate of Environment and Urbanization ("PDoEU")	PDoEU has regulatory functions relating to the Project such as environmental impact assessment permits and environmental permitting.
	Tekirdağ Provincial Directorate of Disaster and Emergency Management	This organization has a function to manage and respond to emergency cases.
	Tekirdağ Provincial Directorate of Culture and Tourism	This organization may provide specific remarks related to the archaeological potential of the Project site.
	Edirne Cultural and Natural Heritage Preservation Board	This organization may provide specific remarks related to the archaeological potential of the Project site.
	Petroleum Pipeline Corporation (BOTAŞ) Kırklareli Branch Office	The Institution may provide remarks about the impacts of the Project on the over ground and underground plants.
	Tekirdağ Provincial Directorate of Public Health	The Institution may provide remarks about the location of the Project and its impacts on public health
District	Şarköy Municipality	The Project site is located in Şarköy District, the Municipality of Şarköy is a stakeholder as it would be one of the authorities to grant relevant permits, approvals and consents during the planning, construction and operation of the Project. Other institutions may provide Project and site specific concerns.
	Sofuköy Mukhtar	
	Yeniköy Mukhtar	
	Şarköy Chief of Forest Management	The region where the project will be conducted is forest land. Detailed information on the possible impacts on the forest area where the project will be carried out is obtained from Şarköy Chief of Forest Management.
	Şarköy District Directorate of Food, Agriculture and Husbandry	The Provincial Directorate of Agriculture Food and Livestock is the legal unit controlling and regulating the agriculture and livestock activities, which are affected by the project. Through the Directorate, information is obtained about the impacts of the project on agricultural and livestock activities in the region.
	Şarköy Land Registry	The main task of the Land Registry administration is to ensure that the title deed registry records under the responsibility of the state are kept regularly, that all kinds of contractual and non-contractual title deed transactions and registrations about the immovable properties are made, that all changes in records are tracked and supervised, and that all records and documents are archived and stored. In this context, the Land Registry office is authorized in the process of taking necessary permits for the project.
Non-Governmental Organizations		
Provincial	Chamber of Environmental Engineers (Thrace Region)	



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Level	Organization	Relation to the Project
	Chamber of Urban Planners (Tekirdağ Office)	These chambers/associations may provide provincial-specific and or site-specific remarks related to the project.
	Chamber of Civil Engineers (Tekirdağ Office)	
	Chamber of Architects (Tekirdağ Office)	
	Chamber of Agricultural Engineers (Tekirdağ Office)	
	Şarköy Environment and Nature Conversation Association	Şarköy Environment and Nature Conservation Association is engaged in the activities related to the scope of the project. The aim of the association is to promote the use of nature and natural resources, to use and to protect the nature in the most suitable way, to prevent pollution, to spread the consciousness of nature and environment protection and to draw public attention to environmental problems.
International Agencies		
International	IFC/EBRD/KFW	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.
Universities		
Provincial	Tekirdağ Namık Kemal University	Provincial university may provide provincial-specific and or site-specific remarks related to the project.
Community Members		
Regional	Tekirdağ City Community	Community members may have concerns on the Project
Provincial	Şarköy District Community Members	Community members may have concerns on the Project.
Project	Sofuköy Quarter Community Members	Community members may have concerns on the Project.
	Yeniköy Quarter Community Members	
	Ch Kalpak Vineyards	The company, Kalpak Agricultural Products Co. Ltd., located in the project area is an important stakeholder in the project.
Media		
Media	National and local media	These stakeholders may have concerns and remarks on the project.
Employees		
Project Employees	Construction Employees	Employees may provide concerns and remarks during the lifecycle of the project.
	Operation Employees	
	Decommissioning Employees	



APPENDIX B

Questionnaires Used in the Meetings



APPENDIX B-1 FOCUS GROUP DISCUSSION TEMPLATE

Place:

Type of Group:

Date:

(Information should be given out about the Project verbally and visually by using maps and other materials)

Subjects		Positive Impacts	Negative Impacts	Recommendation
Do you think the Project will have a positive or negative impact on social services or infrastructure ?	Roads, Transportation			
	School, Education			
	Health and Safety			
	Electricity, water, internet and other services			
	Solid waste, waste water and sewage system			
Do you think Project will have a negative or	Wealth and prices			
	House and lands			



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positive impact on the economy, employment and livelihoods of your village/settlement?	Main income resources			
	Employment			
Do you expect any positive or negative impact of the Project on your life quality?	Noise, dust			
	Social harmony with workers from outside			
	Housing and resting opportunities			
Are there any issues you want to be informed?				



APPENDIX B-2 DEEP INTERVIEW TEMPLATE

Place:

Date:

Name of Organization/Body:

Name and Title of Respondent:

Title and Profession of the Respondent:

Contact Information:

1. Do you have Project information? If so how much do you know and from which source did you get that information?
2. What kind of a role does your organization have/can or you would like to have?
3. Do you think communication between all parties is sufficient? In your opinion are all parts aware of the Project?
4. Do you think Project has a positive impact? Is it possible to enhance this impact? Do you think your institution can play a part for this process?

Construction Proses:

Operation Process:

5. Do you think Project has a negative impact? Is it possible to reduce this impact? Do you think your institution can play a part for this process?

Construction Proses:

Operation Process:

6. Suggestions



APPENDIX B-3 COMMUNITY LEVEL SURVEY QUESTIONNAIRE

COMMUNITY LEVEL QUESTIONNAIRE

Place:

Date:

Name of Interviewer:

Phone Number:

Section A: Demographics

A1) Population Numbers, Education, Ethnicity

1. Information

1.1 Total Population (Registered):

		No of People	No of Households
1.	Permanent Residents		
2.	Seasonal Residents		
3.	Owning second house in the area		
4.	Other (Specify)		

1.2 Characteristics of Population

	No of People	No of Households
Population Between 0-6		
Population Between 7-18		
Population Between 19-35		
Population Between 36-65		
Population More Than 65+		

1.3 Has the population of the community changed over the past 5 years?

☐ Increased ☐ Decreased ☐ Remained the same

1.4 What are two main reasons for the increase, decrease or lack of change? (e.g. Migration to urban centres for employment)?

1).....

2)



1.5 Education Status of the Population

1. Illiterate	
2. Literate but hasn't been to school	
3. Primary School Graduate	
4. Secondary School Graduate	
5. High School Graduate	
6. University Graduate	
7. Masters Graduate	
8. Doctorate Graduate	

1.6 Vulnerable Groups of the Population

1. Physically Disabled	
2. Mentally Disabled	
3. Female Household Head	
4. Child Household Head	
5. Aged more than 65	

1.7 Is there any other languages spoken in the community ? ☐ Yes ☐ No→Go to Q 1.9

1.8 Which languages are spoken in the community ?

Languages	No of Villagers
1. (Indicate)	
2. (Indicate)	

1.9 What is the religious composition of your community?

Religions	1. Muslim	2. Christian	3. Jewish	4. Other (Specify)
% of the Community				

1.10 When was your community established? Can you explain about the history of the community?

.....

.....

.....

.....

1.11 What is the house ownership of residents in the community?

Tenant (%)	Owner (%)	User Without Rent (%)



A2) Migration

1. Except for income generating activities, is there anybody/households visiting your community seasonally?

☐ Yes

☐ No (**Go to Q 2**)

a. Why do people migrate to your community?

.....

.....

2. Can we talk about a migration in to the community?

☐ Yes

☐ No (**Go to Q 4**)

a. Why and from where do people who migrate to your community seasonally?

.....

.....

.....

.....

3. What are the impacts of these migrations? ☐ Yes

☐ No (**Go to Section B**)

Positive Impacts		Negative Impacts	
1.		1.	
2.		2.	
3.		3.	

4. Can we talk about a migration out?

☐ Yes

☐ No (**Pass to Section B**)

a. Which part of the population migrates out?

.....

.....

.....

b. Why this part of the population migrates?

.....

.....

c. What are the impacts of migration out to the community?

Positive Impacts		Negative Impacts	
1.		1.	



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2.		2.	
3.		3.	

d. What are the impacts of alteration in population because of migration on land usage?

.....

.....

.....

Section B: Social Services

B1) Education and other services

1. Information about school and literacy

- a. Is there a primary school in the community? ☐Yes ☐No
 - i. If yes, how many teachers are there in the village?
 - ii. If not, how far is the closest primary school?km
- b. Where is the closest secondary school and how far away?.....;km
- c. Where is the closest high school and how far away?.....;km
- d. What is the percentage of primary school attendance between children?%
- e. What is the percentage of secondary school attendance between children? %
- f. What is the percentage of high school attendance between children? %
- g. What is the percentage of children aged between 6-15 who are not attending to school?
.....%
- h. How many teachers are there in the community?.....
- i. What is the percentage of literacy in the community?%

2. Services in the Community

Services	Yes	No	Number	Explanation
a. Water Supply				
b. Electricity Line				
c. Waste system (solid and water)				
d. Shops				
e. Road				
f. Internet				
g. Telephone				



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h. Transportation				
i. Health Unit				
j. Doctor/Nurse				
k. Primary School				
l. Secondary School				
m. High School				
n. Mobile Education				
o. Mosque				
p. Graveyard				
q. Sites of socially/ culturally/ importance				
r. Sites of historically importance				
s. Irrigation				Main products: Total irrigated lands:
t. Gravel/Construction material pits/sources				



B2) Health

3. Is there any health problem in the community? ☐ Yes ☐ No

a. If yes; what are the main ones?

Health problem	Source
1.	
2.	
3.	

C) Main Income Sources

C1) Economical Activities

1. What are the main income generating activities of the community?

Sources	Explanation
a. Agriculture	
b. Animal Husbandry	
c. Forestry	
d. Tourism	
e. Other (Specify:)	

2. Land Ownership



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Ownership	Explanation
Owned and used by the community	
Used but not owned by the community	
Meadows	
Forest Lands	
Other (Specify:)	

3. Main agricultural products produced in the community

Product	Tones of production	Explanation
1. Wheat		
2. Barley		
3. Maize		
4. Sunflower		
5. Canola		
6. Sugar Beet		
7. Fruit		
8. Vegetable		

4. Percentage of working population to total population

Working Status	Percentage (%)
Salaried Worker (Permanent)	
Wage earner (Short Term)	
Working for his own (farmer, etc)	
Employee	
Unpaid family worker	
Jobless	



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Economically inactive

5. Can you rate your community's development speed between 1 to 5?

Very Fast Fast Normal Slow Very Slow
5 () 4 () 3 () 2 () 1 ()

6. What is the reason for you to think that your economy is developing between 5/4/3/2/1?

.....
.....
.....
.....

7. What is the average income for a household in the community?TL

8. What is the price range of lands for house construction in the community?.....TL

C2) Community Skills Audit

a. Has anyone in the community experienced working on construction projects? ☐Yes ☐No → "Go to "c""

b. if yes explain	1. Type of Project	2. When	3. Where

c. Which of the following skills are available in your community?

- | | |
|---|--|
| 1. <input type="checkbox"/> Engineer | 8. <input type="checkbox"/> Heavy machine operator |
| 2. <input type="checkbox"/> Food Service | 9. <input type="checkbox"/> Heavy vehicle driver |
| 3. <input type="checkbox"/> General builder | 10. <input type="checkbox"/> Wall builder |
| 4. <input type="checkbox"/> Road repairer | 11. <input type="checkbox"/> Administrative person/computer/office |
| 5. <input type="checkbox"/> Local guide/teacher/translator to English | 12. <input type="checkbox"/> Welder/metal worker |
| 6. <input type="checkbox"/> Tree cutter | 13. <input type="checkbox"/> Driver |
| 7. <input type="checkbox"/> Security | 14. <input type="checkbox"/> Other, specify..... |

D) Community Information Sources and Social Network

1. Do you have any information about the Project?→ ? ☐ Yes ☐ No →Go to Q3

2. When and how did you gain information about the Project?

.....



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.....

3. What kind of information do you have about the Project?

.....

.....

....

4. Do you need more information about the Project? → ☐ Yes ☐ No

5. What kind of information do you need?

.....

.....

.....

.....

.....

6. How villagers would prefer to get Project information?

1. ☐ By Village Mukhtar

2. ☐ By Company Authorities

3. ☐ By Public Officers

4. ☐ By Communication Person

5. ☐ Others (Specify)



APPENDIX B-4 WIND POWER PLANT INVESTOR SOCIAL QUESTION/INQUIRY FORM

Respondent's Name-Surname:

Mission:

Spent years in the company:

Please answer the questions below in the blanks:

1. Explain the connection between associated companies briefly. What could be said about the company policy? In which fields is the company active?
2. What kind of experiences does the company have on energy field?
3. What kind of service procurements are provided and which jobs are resigned to which subcontractors within the scope of RES? (Should be considered within past contracts and future plans)

You can fill the table below (Please check your examples):

Company	Contracted Job	Explanation/Date(if there is one)
Golder Consultancy	SIA	
	Feasibility Report	
	Ornithological-Ecological Assesment Report	
	Transmission-Distribution	
	Excavation of roads, infrastructure and related construction works	
	Carbon management	
	sand, gravel, cement supply	
	Turbine supply, transportation and establishment	
	Construction of power plant	
	Construction of transmission line	
	Social and environmental assesment concerning transmission line?	
	Establishing the construction site	
	Catering service	
	Cleaning service	
	Other?	
	Other?	

4. Are there any provisions concerning social and environmental impacts in the contracts of mentioned subcontractors?(It is possible for you to send contract examples)
5. How many posts will there be in the transmission line of the energy that is generated in RES? Is it going to be connected to a substantial transmission line or a new transmission line will be constructed? Is an expropriation process conceivable for the energy transmission line?



6. How many people will be employed in the operation phase after RES is completed?
7. In what kind of lines of work is employment opportunity going to be provided within the scope of RES and transmission lines? (Please specify as construction worker, clerical works, security, cookery, cleaning works, engineering, heavy machine operator, driver, welder etc.)
8. What kind of qualifications should be followed while employing?
9. Is providing employment in the villages, which are 3-4km away from power plants, considered within the scope of RES?
10. Does subcontractors' contracts include fulfilling the social security needs of employees?
11. What kind of positive or negative impacts do RES and transmission line have on the area? Who are of first priority to be affected?
12. How are potential injuries expected to be eliminated within the scope of project?
13. How could potential advantages potential be increased within the scope of project?
14. Are there any woman or child(school-age) workers expected to work in the project? If any, in which positions are they going to be employed?
15. Where will the workers reside within the scope of RES and transmission line construction? What kind of opportunities (health, education, transportation, social opportunities etc.) will be provided by whom?
16. How waste water and garbage will be destroyed? Are there any recycling precautions?
17. Were the residential informed about the project in advance? Which informations were given by whom, when and where? If any, can we get supportive document (announcement etc.)?
18. Are there plans on informing the residential later on in the project? What are these?
19. Is there going to be a grievance or request mechanism?
20. Is there a public relations specialist, or will be?
21. Will there be one on one interviews during the expropriation process, which will take place throughout the transmission lines, with those who are concerned? Will they be informed about the project? Who will do this informing?
22. Do you have a planned social responsibility project in the area? For example renewal of village roads, providing opportunities to school etc.
23. Are the employee, who will be working in power plant and transmission line constructions, be enrolled to Social Security System? Does subcontractors' contracts include articles related to this issue?



24. Is there going to be a training on the subjects of job safety and worker health?
25. How will the working hours of the workers be? How many hours will they work in a day?
26. What kind of security and health risks will be waiting the workers who are working in windpower plant and transmission line construction? What kind of occupational risks can we expect?
27. What kind of precautions are planned to be taken against mentioned accidents and health risks?
28. What kind of precautions will be taken against disasters like fire, earthquake, flood, fuel leakage?
29. Will there be hazardous waste? What are these? How will they be eliminated?
30. How many trees are planned to be chopped down within the scope of the project?
31. Are there any areas, which are used for beekeeping, husbandry etc., in the construction site?
32. Are there any managements which has a potential to be affected by the project, around the project site? Were those managements informed about the project?
33. What kind of precautions are planned to be taken against the accidents and risks that the residential could experience?
34. What kind of requirements are looked for while choosing the roads to be used during the construction phase? Will the roads crossing in or near the settlements be used? Are the routes, which are used by animals or schools buses,going to be used?

If there is anything else you want to add, please share it/them.

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