

Stakeholder Engagement Plan (SEP) for Uluborlu Wind Farm Project, Isparta Province, Turkey

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1.0 Introduction – Summary of Project

Kavram Enerji Yatırım Üretim ve Ticaret A.Ş. (Kavram Enerji) is a subsidiary of Fina Enerji. Fina Enerji is a holding company involved in the development, generation and sale and trading of renewable energy. Fina Enerji has seven operational wind farms (WF) and five wind farms under construction. Current energy capacity of the operating seven WFs is 241.45 MW. 207.75 MW energy will be added to the current total capacity after the completion of five WFs that are under construction.

Uluborlu Wind Farm (the Project) is one of Fina Enerji projects which are currently under construction. It is developing in Uluborlu District of Isparta Province in Turkey. The wind farm will have 36 turbines and the total installed capacity of the Uluborlu Wind Farm will be 61.2 MWm / 60 MWe. The Project will be connected to the existing Keçiborlu Transformer Center (TC) - Gölovası (TC) ETL through an overhead Energy Transmission Line (ETL) (approximately 6 km in length) with 16 towers that will be newly constructed in the scope of the Project.

In the scope of the Project type of lands that are to be impacted are mostly forest lands. 10% of total land under the impact of expropriation is privately owned and classified as “agricultural lands” Resettlement will not occur in the scope of Uluborlu WF. Land acquisition process is continuing under two components of the Project: Uluborlu WF and ETL.

The implementation of Uluborlu WF Project will require financing from KfW and Hermes therefore international requirements are being applied within the scope of the Project. Environmental and Social Impact Assessment report was prepared in 2014. Land Acquisition and Livelihood Restoration Plan (LA&LRP) was also prepared in 2015 considering that some lands are subject to expropriation and easement.

Expropriation lists are prepared in accordance with the Zoning Plan and these lists are established by GDoLRC and delivered to Kavram Enerji. According to the expropriation lists there are two villages under the impact of land acquisition and easement which are İleydağı and İnhisar. The total amount of land which will be occupied by the Project is 837,566.12 m². There are two expropriation processes continuing for the Project at the same time which are for access roads (including turbines and switchyard) and ETL. Expropriation process for turbines and access roads is leaded by EMRA (Turkish Energy Market Regulatory Authority) and expropriation process for ETL route is leaded by TEİAŞ (Turkish Electricity Transmission Company). Access roads will be totally 31.5 km in length and land acquisition will occur along this route. Forest lands owned by Turkish Ministry of Forestry and Water Affairs (MoF&W) constitute around 27.2 km of the total 31.5 km route. Land acquisition for forestry lands is already completed. Lands around the remaining 4.3 km length of route are privately owned.

739,842.10 m² of forestry lands are already acquired. The rest 97,724.02 m² of lands are owned privately. Details of lands to be acquired are given in Table 1-1.

Table 1-1: Amount of Lands to be Acquired by Uluborlu WF

Forest Lands to be Acquired (m ²)				Privately Owned Lands to be Expropriated (m ²)		
<i>Turbines</i>	<i>Access Roads</i>	<i>Switchyard</i>	<i>ETL</i>	<i>Turbine</i>	<i>Access Roads</i>	<i>ETL</i>
414,175.32*	157,380.51*	8,004.13*	160,282.137**	3,019.97***	38,275.11***	56,403.94****
TOTAL				TOTAL		
739,842.10 m²				97,724.02 m²		

* Forest permit for turbine, access road and switchyard was given; 18.02.2015

** Forest permit for ETL was given; 31.07.2015

*** Expropriation process is executed by EMRA

**** Expropriation process is executed by TEIAS

Besides land acquisition, 55,993.11 m² of lands will be impacted by easement. Easement is the right for land usage for the whole life of the project. In most cases land owners can maintain agricultural activities therefore it is possible to say that these lands are partially impacted and these impacts mostly occur during construction process.

Out of 97,724.02 m² of privately owned lands in 68 parcels, 20 parcels are impacted by ETL and 48 parcels by access roads including turbine foundation. Number of impacted land owners is given in Table 1-2. Most of the impacted lands are in the borders of İleydağı; land loss is in question only in 4 parcels in İnhisar for which the details are given in Section 4 because of Uluborlu WF.

Table 1-2: Number of Land Owners Impacted by Land Loss of Uluborlu WF

Number of Land Owners Impacted by		
<i>Turbines</i>	<i>Access Roads</i>	<i>ETL Route</i>
2	78	37
TOTAL		
102		

Although total sum for impacted land owners is 117, name of 15 land owners are included in both project and ETL related expropriation lists therefore total sum decreases to 102.

2.0 Regulatory Requirements for Stakeholder Engagement

This section outlines the regulatory framework for the Project's stakeholder engagement activities, namely:

- the legislative requirements of the Turkish Republic; and
- the Performance Standards of the International Finance Cooperation (IFC).

Turkish Legislation

The Environmental Law (No. 2872), which was published in Turkish Official Gazette No. 18132 dated August 11, 1983 and revised in Turkish Official Gazette No. 26167 dated May 13, 2006 (Law No. 5491) provides the legislative framework for the regulation of industries and their potential impact on the environment. Industrial projects are subject to varying levels of review that begin

while projects are in the development and pre-operation phases. Additional regulations apply to facilities once they are in operation.

According to Article 6 of the EIA regulation, projects should either submit an Environmental Impact Assessment (EIA) Report or Project Description Report (PDR) based on the classification of the projects listed in Annex I and Annex II of the EIA regulation. Annex I and Annex II define the type and projects that are subject to preparing and submitting an EIA Report and PDR, respectively.

For the projects that are listed in Annex II, a Project Description Report (PDR), which is a preliminary EIA report, is prepared in order to decide on whether an EIA report is required or not.

EIA process of the Project was started in 2009 therefore the Project was subject to the former EIA Regulation that is published in Official Gazette No. 26939 dated July 17, 2008. According to the former EIA Regulation, the wind farm projects with a capacity of 10 MW and more are included in Annex II. Since WF Project's capacity is 60 MW, a PDR was prepared and submitted to Isparta PDoEU (Provincial Directorate of Environment and Urban Planning) for development consent. Isparta PDoEU evaluated and reviewed the PDR and "Environmental Impact Assessment is not required" decision was issued for the Project on September 9, 2009. Afterwards, the number of turbines has been increased from 20 to 36. The wind farm projects having more than 20 turbines are included in Annex I of the EIA Regulation that is published in Official Gazette No. 28784 dated October 3, 2013. This means, it is required to prepare EIA report for Uluborlu WF Project. The EIA process of Uluborlu WF has accomplished and approved by MoEUP (Ministry of Environment and Urbanization) on December 2, 2014 with decision number 3701. For the ETL route of the Project "Environmental Impact Assessment is not required" decision was issued on February 19, 2015 with decision number E-201565.

According to National EIA Regulation, projects which are subject to EIA Process must organize a "Public Participation Meeting (PPM)". PPM date, hour and place will be determined by Governorship; preferably in the closest settlement which is easily accessible. Announcement of PPM should be published before ten working days of PPM in a local newspaper. PPM is conducted with the leadership of Provincial Directorate of Environment and Urbanization. During the meeting Project information should be given in order to give an opportunity to local people to raise their concerns, questions and comments. Minutes of meeting is recorded during PPM.

National EIA regulation does not involve any other social activities. Ministry of Environment and Urbanization only gives permission to investors for leaflet distribution and other social activities like applying questionnaires and seminars.

IFC Performance Standards

According to IFC Performance Standards on Environmental and Social Sustainability (2012); there are 8 PSs that a Project must include. It articulates the Company's strategic commitment to sustainable development and for risk management. These are:

PS 1: Assessment and Management of Environmental and Social Risks and Impacts

PS 2: Labor and Working Conditions

PS 3: Resource Efficiency and Pollution Prevention

PS 4: Community Health, Safety and Security

PS 5: Land Acquisition and Involuntary Resettlement

PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

PS 7: Indigenous Peoples

PR 8: Cultural Heritage

The IFC expects clients to identify and interact with their stakeholders on an ongoing basis, and to engage with potentially affected communities through disclosure of information, consultation, and informed participation in a manner deemed by the Bank to be commensurate to the impacts associated with the Project.

For stakeholder engagement, two PSs become prominent which are PS 1 and PS 5 (if land acquisition and resettlement is required).

According to PS 1 investors should build a strong, constructive, and responsive relationship with all parties for the successful management of a project's environmental and social impacts. 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. Investors should identify the range of stakeholders that may be interested in their actions and consider how external communications might facilitate a dialog with all stakeholders. According to PS 1 all investors should prepared a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the affected communities.

Investors should provide affected communities with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism. If stakeholder engagement is the responsibility of the host government, investors will give their best affords to collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with the objectives of this Performance Standard.

PS 1 suggests to implement and maintain a procedure for external communications that includes methods to (i) receive and register external communications from the public; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track, and document responses, if any; and (iv) adjust the management program, as appropriate. In addition, clients are encouraged to make publicly available periodic reports on their environmental and social sustainability. Investors should also establish a grievance mechanism to receive and facilitate

resolution of affected communities' concerns and grievances about the companies' environmental and social performance. The grievance mechanism should be scaled to the risks and adverse impacts of the project and have affected communities as its primary user. It should seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. Investor will inform the affected communities about the mechanism in the course of the stakeholder engagement process.

PS 5 suggests the investors to engage with affected communities, through the process of stakeholder engagement described in PS 1. Decision-making processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. Disclosure of relevant information and participation of affected communities and persons will continue during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are consistent with the objectives of PS 5.

Uluborlu WF Project will follow the necessities described in PS 1 and PS 5. Kavram Energy has developed a grievance mechanism which is described detailed in Section 7.

3.0 Summary of Previous Stakeholder Engagement Activities

Kavram Energy has an on-going consultation process with stakeholders in the Project area. Engagement process with statutory stakeholders started in 2008 with the preparation of Project Feasibility Report. Legal process continued about seven years and construction process started on the early 2015. Project Relation Officer (PRO) has been actively working in the area since September 2014, before construction activities started. In the scope of Uluborlu WF, a PPM was organized in the village cafe of İleydağı Village on 22nd of July, 2014 with the attendance of local people and institution representatives listed below:

1. Ministry of Environment and Urbanisation
2. Isparta Provincial Directorate of Environment and Urbanisation
3. Ministry of Forest and Water Affairs - General Directorate of Nature Conservation and National Parks
4. Isparta Provincial Special Administration
5. Uluborlu Directorate of District Food Agriculture and Livestock
6. General Directorate of Meteorology

Announcements of PPM were published in two newspapers; one local and one national. Announcements of PPM can be seen from Appendix 3A and 3B. Also a leaflet was prepared and distributed (see Appendix 4).

After the completion of camp site construction in June 2015, PRO has started to work full time in the Project area. During site survey of LA&LRP activities in November 2015, it was observed that mukhtars and PRO have a close relation; considering that they act together in order to solve the road problem about not providing any compensation because of the road passing through İleydağı Village constructed by Province Special Administration about 30 years ago (detailed in LA&LRP Section 1.2). Besides, camping site of Uluborlu WF Project is located at the entrance of İleydağı Village therefore PRO and locals can engage anytime considering that there is no access issue; village centre and camping site has a walking distance only. PRO for this project has 15 years of experience in project management and permit and other than public relations with local people. He also worked in other three projects of Fina Energy. The PRO is working full time in camping site that is located near İleydağı village entrance. Locals have the opportunity to get in contact with PRO anytime. Besides, PRO is accessible by mobile phone with mukhtars.

Environmental and Social Impact Assessment (ESIA) studies were carried out in the Project area in September 2014 and an ESIA report was prepared. Land acquisition and easement are in question to the Project therefore a Land Acquisition and Livelihood Restoration Plan (LA&LRP) was prepared in December 2015. Site survey was carried out for LA&LRP preparation in the Project area between 25th and 29th November 2015 by AECOM. During site activities land owners of impacted parcels are informed about the process by using digital maps via laptop. During the site survey by AECOM information was gained of about 57 parcels out of 68 considering that some of the land owners did not want to be consulted and some of the lands have not being used for a long period of time since the heirs have migrated from the village long time ago. AECOM has reached the contact information of land owners on 57 parcels during site survey. Considering that local people living in villages are either relatives or have contact with residents of their villages; The PRO will try to reach to the owners of 11 parcels via land owners contacted during LA&LRP activities. Kavram Enerji will revise the expropriation lists' considering that current access road is designed in a larger area more than the required during the construction activities. According to Article 7 of the Circular on the Implementation of Zoning Law no. 3194 and Related Regulations, traffic roads cannot be constructed with less than 10 meters width for the generation of Zoning Plans and Plan Amendments. Therefore Kavram Energy prepared the current expropriation list for 10 meters (five meters at each side of the road). On the other hand Kavram Energy has committed not to exceed 6 meters (excluding side slope) during the construction of roads according to the Ministry of Forestry and Water Affairs (MoF&W) requirement. Therefore Kavram Enerji prepared the current expropriation list for 10 meters (five meters at each side of the road) although 6 meters of enlargement in access roads will be sufficient for Project activities also according to their commitment. With the revision of road length, current expropriation list will also be revised and number of affected people will be decreased.

During the construction process some lands are damaged by subcontractors during construction activities of ETL route. During the site survey of LA&LRP a land owner whose land had been damaged during construction activities was determined. The damage is recorded by Kavram Enerji and he was informed that he would be compensated by Kavram Enerji. This compensation will include cleaning the land from excavation wastes and plow in order to reconstitute the land. A lease agreement will be signed between the land owner and Kavram Enerji.

4.0 Future Stakeholder Engagement Activities

Kavram Enerji hired a PRO to work full time in the Project area in order to organize engagement activities properly. PRO is already in relation with local people considering that camping site is located at the entrance of İleydağı Village.

Engagement activities have an immense importance during construction process of the Project considering that impact level will be at minimum during operation phase.

PRO will introduce himself by ad hoc interviews to all villagers in İleydağı and İnhisar as the first activity considering that village population of İleydağı is about 303 with approximately 127 households and population of İnhisar is about 145 with approximately 33 households. Populations of two villages are not crowded therefore easier to reach all parts. This will be followed by preparing a new leaflet to inform locals about expropriation and easement process, legal steps, negotiations on purchase method, other possible methods (which is expropriation by related institution) as soon as the expropriation lists are approved by TEİAŞ and EMRA. This period is assumed to be the first quarter of 2016. He will also inform them about the grievance mechanism with ad hoc interviews like how to fill a grievance form. In cases where locals will not prefer to fill a grievance form, they will be given the contact information of PRO in order to be accessible by mobile and/or face-to-face. In these cases, PRO will fill the grievance form together with the complainant considering that there are vulnerable groups like elderly, disabled and illiterates. By using these methods, all stakeholders will be included in the engagement process.

Livelihood restoration measures given below will be applied by PRO. In case any damage occurs, owner/user can reach PRO directly by mobile or via face to face; or can get in contact with the mukhtars. After that PRO will visit the the land, location, asset, etc. with the owner/user in order to record the damage in cooperation and then agree on restoration measures which are:

1. Cash compensation for any damage given to infrastructure of houses (walls to protect houses from flooding, drainpipes, etc.)
2. Compensation for or assistance with transport of equipment or machinery (raw materials for construction, man power, equipment and machinery for excavation works and etc.)
3. Livelihood restoration assistance like cleaning the land from excavation wastes and plow the land in order to restitute;
4. Training, skill development, access to job opportunities, etc.

5.0 Identification of Stakeholders and Communication

In order to develop an effective SEP, it has been necessary to determine exactly who the stakeholders are and understand their priorities and objectives in relation to the Project. By classifying stakeholders it has been possible to develop a plan that is tailored to the needs of different stakeholder groups. Different issues are likely to concern different stakeholders and so

different types of stakeholders have been grouped based on their connections to the Project. Having an understanding of the connections of a stakeholder group to the Project helps to identify the key objectives of any engagement.

Ongoing stakeholder identification is a foundation element of the Stakeholder Engagement Plan. At minimum, the stakeholder identification process will be carried out prior to the start of the construction phase and again prior to the beginning of the operation phase. Updates to the stakeholder list will be carried out by Construction Operation Manager on a regular basis throughout the duration of the Project where lists will be kept and updated by the PRO.

A list of the organizations and individuals identified is presented in Table 5-1. This list will be kept up to date if new stakeholders are identified during the course of the Project. The contact details of individual stakeholders have also been compiled to readily communicate with each stakeholder. This information will be retained, but will not be shared with any third party.

Stakeholders can be either external or internal to the Company and can be defined as people or groups of people that are:

- directly or indirectly affected by the project;
- have interests in the projects and its activities; or
- have the ability to affect the project and its planned outcome.

Table 5-1 Stakeholder List

Stakeholder Groups	Stakeholder Description
Direct and Indirect Stakeholders in the Project Area	
External Stakeholders	
Local Communities	
Directly Affected People	
There are privately owned and used lands to be affected from the WF and ETL. Expropriation and easement are in question in 68 parcels. The number of affected households is approximately 63.	These affected people are directly impacted by the Project because of land loss and restrictions in land use because of easement. During site survey of LA&LRP activities in November 2015 land owner and/or users of 57 parcels are contacted. PAP's who are not satisfied with expropriation and easement rates and who think that land values will decrease, may not want the Project.
Governmental Institutions	
National Level	
Ministry of Environment and Urbanization	Government ministry office that is responsible from environmental affairs in Turkey. Kavram Enerji is in contact with the Ministry since 2009.
Ministry of Forestry and Water Affairs	Government ministry office that is responsible from forestry affairs in Turkey. Kavram Enerji is in contact with the Ministry since 2009.
Ministry of Science, Industry and Technology	Government ministry office that is responsible from industrial affairs in Turkey.
Ministry of Health	The government ministerial office that is responsible for health affairs in Turkey. Kavram Enerji is in contact with the Ministry since 2012.
Ministry of Food, Agriculture and Livestock	Government ministry office that is responsible from

	agricultural and animal husbandry activities in Turkey. Besides provides control of the quality of foods. Kavram Enerji is in contact with the Ministry since 2013.
General Directorate of Land Registry and Cadastre	The responsibility area of the institution is: to undertake contracts and all kinds of registrations concerning the immovable assets, to determine the fundamental principles for the arrangements of the title registrations, to determine the legal and technical status of the immovable assets by realizing the establishment of cadastres, and to keep the information up-to-date. Kavram Enerji is in contact with the Directorate since 2014.
Energy Market Regulatory Authority (EMRA)	EMRA is responsible to provide an independent monitoring and regulatory body in the energy market of Turkey. Kavram Enerji is in contact with the institution since 2007.
Turkish Electricity Transmission Company (TEİAŞ)	TEİAŞ is responsible for high-voltage electricity transmission in Turkey. Kavram Enerji is in contact with the institution since 2008.
West Mediterranean Development Agency	The agency that aims to realize provincial and local potential in order to ensure sustainable development. Main purpose of the Agency is to publish grant programs according to the needs of the region.
Provincial Government Bodies	
Provincial Governorship	Chief of governmental administration in the Province. Kavram Enerji is in contact with the institution since 2012.
Special Provincial Administration	Semi-autonomous provincial governing body and is responsible from building and maintenance of schools, building and maintenance of other governmental buildings and roads, promoting arts and culture, protection and conservation of nature, social services and regional planning. Kavram Enerji is in contact with the institution since 2013.
Provincial Directorate of Environment and Urbanization	Government directory that is responsible from environment in the Province. Kavram Enerji is in contact with the institution since 2009.
Provincial Directorate of Forestry and Water Affairs	Government directory that is responsible from forestry affairs in Turkey. Kavram Enerji is in contact with the institution since 2009.
Provincial Directorate of National Estate	Provincial government office responsible from sale and transfer of public land. Kavram Enerji is in contact with the institution since 2014.
Directorate of Land Registry and Cadastre	Provincial Institution tied to the General Directorate of the Land Registry and Cadastre. Kavram Enerji is in contact with the institution since 2014.
Provincial Directorate of Health	Government directory that is responsible from health issues in the Province. Kavram Enerji is in contact with the institution since 2012.
Province Municipality	Chief of governmental administration in the Province. Kavram Enerji is in contact with the institution since 2012.
Local Government Bodies	
District Municipality	Chief administration of the District. Kavram Enerji is in contact with the institution since 2012.
District Governorship	Regional administrative unit in the District that has an elected mayor and a council. Kavram Enerji is in

	contact with the institution since 2009.
Province Director of Special Provincial Administration	Chief administration of the Province. Kavram Enerji is in contact with the institution since 2013.
District Land Registry and Cadastre	Semi-autonomous regional governing bodies. Kavram Enerji is in contact with the institution since 2014.
Province Directorate of Food, Agriculture and Livestock	Regional government office responsible from sales and transfer of public land. Kavram Enerji is in contact with the institution since 2013.
District Directorate of Food, Agriculture and Livestock	
Mukhtar of Villages (İleydağı and İnhisar)	Headman of the villages in impact area of the Project (İleydağı and İnhisar); they are elected as leaders of the settlements and represents the interest of their village at the meetings. Kavram Enerji is in contact with the institution since 2014.
Civil and Commercial Stakeholders	
Media	
National Newspapers Hurriyet Milliyet Cumhuriyet Sabah Dünya Zaman Sozcu Birgün Radikal Posta	National newspapers that publishes news from the whole country. PPM meeting announcement was published on "Dünya" newspaper on 2014.
Isparta E-News http://www.sanalbasin.com/isparta-son-dakika http://www.gazete32.com.tr/ http://www.haber32.com.tr/ http://www.ispartahabergazetesi.com/ http://www.akdeniz32.com/anasayfa.html http://www.gazeteler2.com/isparta_gazeteleri.html	Regional media sector that publishes news from the Area
Channel 32	Provincial TV channel that makes news about the Area.
Isparta Haber Newspaper	Local media sector that caters to the residents and non-residents of Project impact area who would like to receive up-to-date information on their town. PPM meeting announcement was published on "Isparta Haber" newspaper on 2014.
Akdeniz (Isparta İçin)	
Groups and Associations Representing Commercial Stakeholders	
Chamber of Environmental Engineers Province Representative	The purpose of the Chamber is to give suggestions and study about issues on the scope of country and society benefit which are related with the profession. No engagement activity is conducted with the Chamber currently considering that efficiency and necessity of engagement with the stakeholder has not occurred yet. Necessity for engagement will be determined in the on-going phase of the Project.
Province Chamber of Commerce and Industry	Establishment for the local businesses working with the aim of taking the interests of industrial and commercial businesses much further and for increasing the capacity of the entrepreneurs. No engagement activity is conducted with the Chamber currently considering that efficiency and

	necessity of engagement with the stakeholder has not occurred yet. Necessity for engagement will be determined in the on-going phase of the Project.
Province Organized Industrial Zones (OIZs) Isparta Süleyman Demirel OIZ Isparta Leather Specialized OIZ	Companies that deal with industry and production facilities together so that environmental pollution can be prevented more with the infrastructure OIZ provides. No engagement activity is conducted with the OIZs currently considering that efficiency and necessity of engagement with the stakeholders have not occurred yet. Necessity for engagement will be determined in the on-going phase of the Project.
Province Chamber of Agriculture	Establishment for the local businesses working with the aim of taking the interests of businesses dealing with agricultural production much further and for increasing the capacity of the entrepreneurs. No engagement activity is conducted with the Chamber currently considering that efficiency and necessity of engagement with the stakeholder has not occurred yet. Necessity for engagement will be determined in the on-going phase of the Project.
District Agriculture Credit Cooperative	Local chamber to support the craftsmen's activities in the region. No engagement activity is conducted with the Cooperative currently considering that efficiency and necessity of engagement with the stakeholder has not occurred yet. Necessity for engagement will be determined in the on-going phase of the Project.
District Bar Representative	Local bar representatives to meet the needs of the lawyers. No engagement activity is conducted with the Chamber currently considering that efficiency and necessity of engagement with the stakeholder has not occurred yet. Necessity for engagement will be determined in the on-going phase of the Project.
NGO's	
Protection of Natural Life Foundation-Province	It is established to protect natural resources, prevent the nature and environment and draw attention of the public about identified issues. No engagement activity is conducted with the NGO currently considering that efficiency and necessity of engagement with the stakeholder has not occurred yet. Necessity for engagement will be determined in the on-going phase of the Project.
Energy Efficiency Association Isparta Branch	It is established to raise awareness about efficient usage of energy; also making scientific researches about energy efficiency and publishing results of these researches. No engagement activity is conducted with the NGO currently considering that efficiency and necessity of engagement with the stakeholder has not occurred yet. Necessity for engagement will be determined in the on-going phase of the Project.
Province Businessmen's Association	They bring the businessmen in the Province together and help to solve the problems they have been through. No engagement activity is conducted with the NGOs currently considering that efficiency and necessity of engagement with the stakeholders
Province Youth Businessmen's Association	
Province Entrepreneur Industrial Businessmen's Association	
District Businessmen's Association	

	have not occurred yet. Necessity for engagement will be determined in the on-going phase of the Project.
Businesses	
Shops and cafes in the impacted villages (İleydağı and İnhisar)	Employees of Uluborlu WF Project may use the shops in affected villages in order to make contributions to local economy.
Businesses in district and province	Workers of Uluborlu WF accommodates in Uluborlu district and Isparta either by renting houses or in hotels.

6.0 STAKEHOLDER ENGAGEMENT APPROACH

6.1 Overall Approach

The Project will maintain on-going engagement with Turkish authorities (State Council, Regional Government, Municipalities and Mukhtars), affected stakeholders and other interested parties to ensure that they are informed about Project progress and receive information on environmental and social performance, can feedback on the effectiveness of mitigation and management measures and have the opportunity to raise any concerns or grievances.

Engagement has, and will continue to be, undertaken in four successive phases, based upon typical project planning and implementation phases. These phases and the key activities conducted or to be conducted during them, are detailed in Table 6-1.

Table 6-1 Stakeholder Engagement Approach

Phases	Objectives	Key Activities
Phase 1: Initial Engagement	<p>To introduce the Project to stakeholders affected both positively and negatively.</p> <p>To identify key stakeholders to be consulted.</p> <p>To generate feedback on the scope, approach and key issues for the ESIA. These steps are completed in the scope of the Project.</p>	<p>PPM meeting (the official meeting which is mandatory for projects that are in question according to Turkish EIA regulation) was organized in İnhisar Village on July 2014. A PRO has assigned to construct good relation with all stakeholders to work actively in the Project area. He has been working in the area since September 2014. Questionnaires were applied during site visit of AECOM.</p>
Phase 2: Impact Assessment	<p>To introduce the Project where necessary. To inform and validate the baseline data through semi-structured interviews.</p> <p>To make specific discussions regarding potential impacts and proposed mitigation/enhancement and monitoring measures.</p> <p>To manage local expectations and concerns.</p> <p>To enable stakeholders to input into the Project design and management plans. These steps are completed in the scope of the Project. Managing local expectations and concerns is an on-going process therefore this process continuous.</p>	<p>PPM meeting was organized in İnhisar Village on July 2014 according to Turkish EIA regulation.</p> <p>LA&LRP activities are held between 25th and 29th of November 2015 by AECOM.</p> <p>During site survey:</p> <p>Secondary data analysis was conducted to identify key stakeholders;</p> <p>Semi-structured interviews were held with key informants;</p> <p>In-depth interviews were held with selected stakeholders.</p> <p>Male Focus Group Discussion was conducted with İleydağı villagers in the village café considering that men were interested in LA&LEP activities therefore they were already in the café with AECOM team and want to gather information about expropriation process.</p> <p>Catch interviews were held with local</p>

		<p>people between 25th and 29th of November 2015 in the village and during visits to impacted parcels.</p> <p>Meetings were held with community leaders (Mukhtars) between 25th and 29th of November 2015.</p>
Phase 3: Disclosure	<p>To make NTS available to all interested and affected stakeholders, NTS will be published by the end of December 2015.</p>	<p>The hard copy of NTS (Non-Technical Summary) will be accessible to the stakeholders of the project at the end of December 2015. Report will be available in construction site. PRO will inform mukhtars of İleydağı and İnhisar. A copy will be given to mukhtars of İleydağı and İnhisar. Also will inform locals with ad hoc discussions which will be held every week until completion of construction of expropriation processes.</p> <p>A leaflet will also be constructed that will contain information about expropriation process, legal steps, company commitments, grievance process and livelihood restoration measures. This leaflet will be accessible to the stakeholders following the approval of expropriation lists, assumable in the first quarter of 2016. Leaflet will be available in construction site. PRO will also inform mukhtars of İleydağı and İnhisar and deliver a copy to mukhtars of İleydağı and İnhisar. PRO will also lead the distribution of leaflets in two villages in order to reach to the maximum number of locals.</p> <p>Project Area Address: Entrance of İleydağı Village, Uluborlu, Isparta, Turkey (Camping Site)</p> <p>Fina Enerji Main Office: Kısıklı Cad. Sarkuysan Ak İş Merkezi No:4 Kat:1 A-Blok P.K.34662 Altunizade Üsküdar / İSTANBUL Tel: +90 216 554 54 00 E-mail: finaenerji@finaenerji.com</p>
Phase 4: Project Implementation	<p>To ensure all affected and interested stakeholders are informed about Project progress and have the opportunity to raise any concerns or grievances.</p> <p>To receive feedback on the effectiveness of mitigation and</p>	<p>Project updates and progress information will be made available to all affected and interested local stakeholders via Mukhtars' offices, and other public places in the two affected villages and Uluborulu.</p> <p>On-going maintenance and availability of the Grievance Procedure by Kavram</p>

	management measures. To manage grievances.	Energy's PRO.
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6.2 Stakeholder Engagement Tools

A range of tools have been, and will be, used for stakeholder engagement as part of this Project. These include community meetings, focus groups, leaflets and key informant discussions. Stakeholder engagement will continue using these already established communication mechanisms, with new mechanisms being employed as required to ensure efficient and effective engagement throughout the life of the Project.

Specific methods will vary across different stakeholder groups and stakeholder engagement with vulnerable and minority groups will use specifically designed mechanisms, as needed. Vulnerable groups in the context of this project include: people who live with the assistance of others; female headed households, physically disabled; and the mentally disabled. During the project operation phase, residents of two villages which are İleydağı and İnhisar are the main stakeholders and special attention will be paid to ensure proper information and communications with residents and their families.

To ensure that the Project reaches all stakeholders, the Project will utilize a range of different communication tools. These are described in more detail below.

6.2.1 Project Leaflets

Leaflet for the Project was developed which includes detailed information about Project impacts and mitigation measures. It also gives information about the Project process and provides contact information (phone, postal address and fax) for any grievances (Attached in Appendix 4). A second leaflet will be developed by Kavram Enerji in order to give information to local people about expropriation process, legal steps, company commitments, grievance process and livelihood restoration measures.

6.2.2 Grievance Mechanism

Grievance mechanism was developed which allows stakeholders to raise concerns or complaints personally as well as via post or electronic mail. The procedure seeks to address concerns promptly and is readily accessible to all affected stakeholders. The Project team will confirm receipt of a complaint within 7 days and find a resolution within 15 days, confirming this in writing to the complainant. A separate formal grievance mechanism is also developed for those employed on the Project (See Appendix 2).

6.2.3 Public Relations Officer

In order to maintain regular communication with affected communities a Public Relations Officer (PRO) was hired in September 2014 to interact with the communities. The PRO is responsible for identifying, informing and recording public views and opinions and for

relaying them to the necessary person for follow up (as detailed in the grievance mechanism). Contact details are:

Contact Person (PRO): Yaşar Salman

Address: Entrance of İleydağı Village, Uluborlu, Isparta, Turkey

Mobile: 0530 526 05 99

Telephone: will be given after completing the construction of administrative building

E-mail: yasar.salman@finaenerji.com

6.2.4 Newspapers

Kavram Enerji has published the announcement in two newspapers (one national and one local) for the PPM organized in October 2014. Please see Appendix 3A and 3B for newspaper announcements.

6.2.5 Public Meetings

Open and targeted meetings may be held to engage with stakeholders, as appropriate. An announcement will be hanged in village café and mukhtar's office of the villages considering that these locations are most common used ones by villagers.

6.2.6 Phone Calls

The phone number for the Public Relations Officer (PRO) is in Section 5.2.4 and he is assigned in the Project area. PRO engages directly with stakeholders face to face or through phone calls, where necessary with stakeholders who want to get in contact with the Company's centre office.

6.2.7 Project Website

Project information will be given under the website of Fina Energy ("www.finaenerji.com.tr").

7.0 Disclosure of Information

Stakeholder engagement during project preparation and implementation phases will be carried out in accordance with IFC Performance Standard 1.

Kavram Enerji will make sure that all affected parties, particularly affected neighbourhoods, the local community organizations, NGOs, and local governmental agencies will be informed about the Project and will be involved in the process of identifying the important issues of the Project. PRO is the responsible personnel from giving information about Project activities to all stakeholders.

Stakeholder engagement will continue throughout construction and operation phases. Key stakeholders will be kept informed by the PRO about the Project progress, have the opportunity to feedback on the effectiveness of mitigation and enhancement measures and to raise any concerns or grievances (but not limited to) the following:

- the impacts that have been identified as a result of the Project
- the impacts and mitigation or enhancement measures that are being implemented;
- the implementation schedule;
- roles and responsibilities;
- monitoring and management measures; and
- information on the grievance mechanism for the Project.

NTS and Stakeholder Engagement Plan will be disclosed. The hard copies of these documents will be available in Turkish in the construction site and at the main office:

Company: Fina Enerji A.Ş.

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

Telephone: +90 216 554 54 00

Fax: +90 216 474 52 52

E-mail: finaenerji@finaenerji.com.tr

To ensure effective stakeholder engagement, the SEP will be reviewed annually by the Kavram Enerji's Operation and Construction Managers. They will be the responsible personnel throughout construction and operation periods of the Project, with it being adapted as appropriate and also will monitor PRO.

A robust grievance mechanism for workers in both construction and operation stages will be developed by the Company before commencement of either activity. Grievance forms for workers will be accessible by the end of December 2015 at the construction site. PRO will also be the responsible personnel for workers' grievances. This process will be managed separately to the public grievance mechanism, but employees will retain their right to access the public grievance mechanism for non-employment-related issues.

8.0 Public Grievance Mechanism

The concepts of social risk management and social license to operate have become an integral part of doing business in emerging markets. These dimensions of a company's social and environmental strategy can be achieved with effective stakeholder engagement, based on active participation of and feedback from groups affected by the company's operations. A mechanism to address affected communities' concerns and complaints—a grievance mechanism—is an important pillar of the stakeholder engagement process, since it creates opportunities for companies and communities to identify problems and discover solutions together.

A project-level grievance mechanism for affected parties is a process for receiving, evaluating, and addressing project-related grievances from affected communities at the level of the company, or project. This mechanism offers companies and affected communities an alternative to external dispute resolution processes (legal or administrative systems or other public or civic mechanisms). These grievance mechanisms differ from other forms of dispute resolution in that they offer the advantage of a locally based, simplified, and mutually.

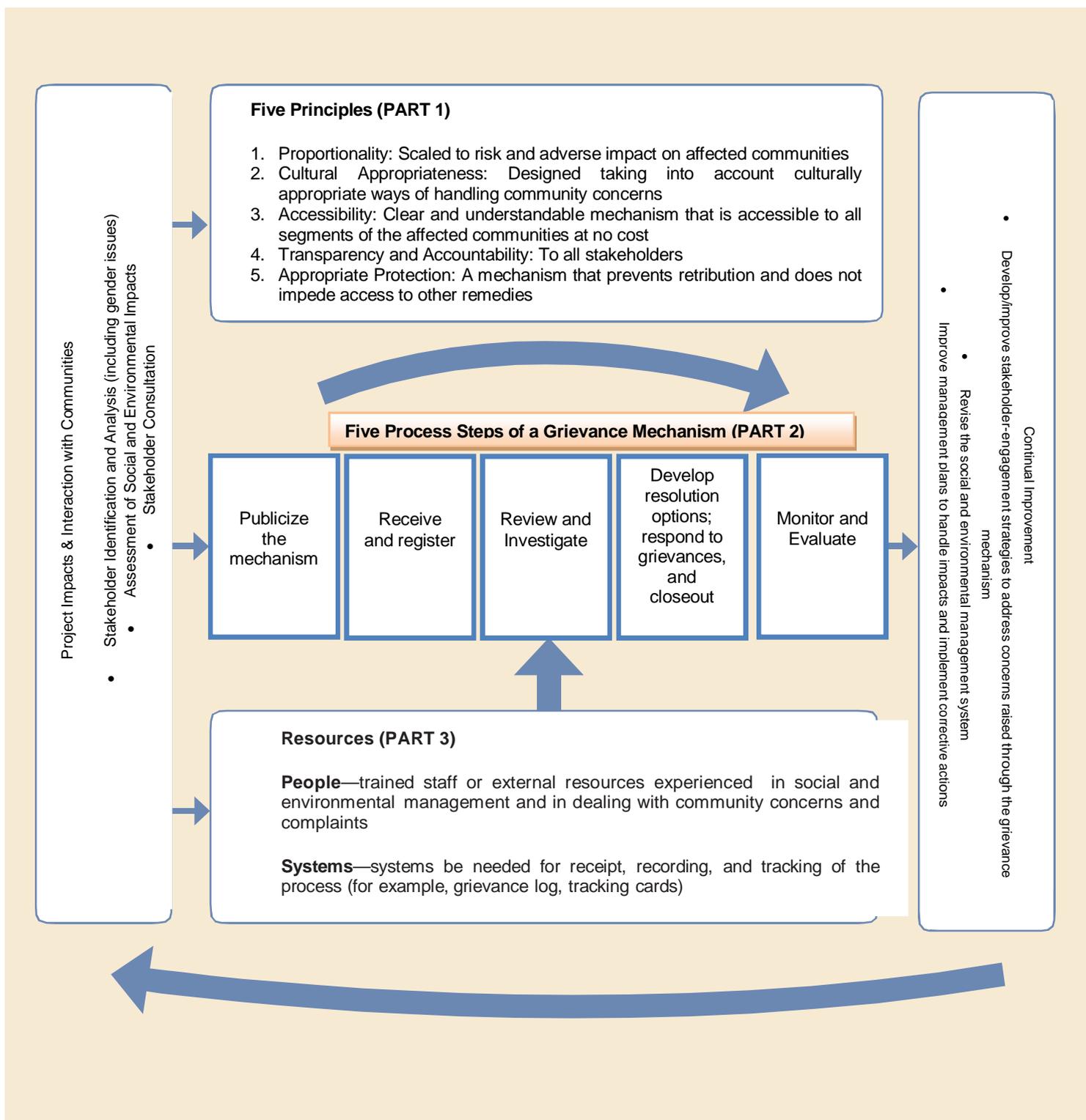
A grievance management process will be established for the Project. This provides a formal and on-going avenue for stakeholders to engage with the Project. This grievance mechanism is accessible to all sections of the affected community, at no cost and does not prevent access to other judicial or administrative remedies. Affected communities will be informed about the grievance process in the course of community engagement activities, a separate grievance mechanism will be established for workers during construction and operation periods.

The Projects' grievance mechanism has been designed to ensure that all grievances that are received are acknowledged and logged and that the complainant knows what to expect in terms of response and when. Grievance procedures will be coordinated through PRO (who is already assigned), who is the primary interface between the stakeholders and the Project Company. Confidentiality procedures will be put in place to protect the complainant, as appropriate.

At the end of December 2015 grievance forms will be available in construction site and also will be given to Mukhtars. PRO will inform mukhtars of İleydağı and İnhisar. PRO will also inform locals with ad hoc meetings.

For a good grievance mechanism basic elements are given in Figure 1.

Figure 1: Basic Design Elements of Project Level Grievance Mechanism for the Project



Grievance Procedure Channels of Communication

Numerous channels will be used for stakeholders to be able to submit their respective complaints and requests:

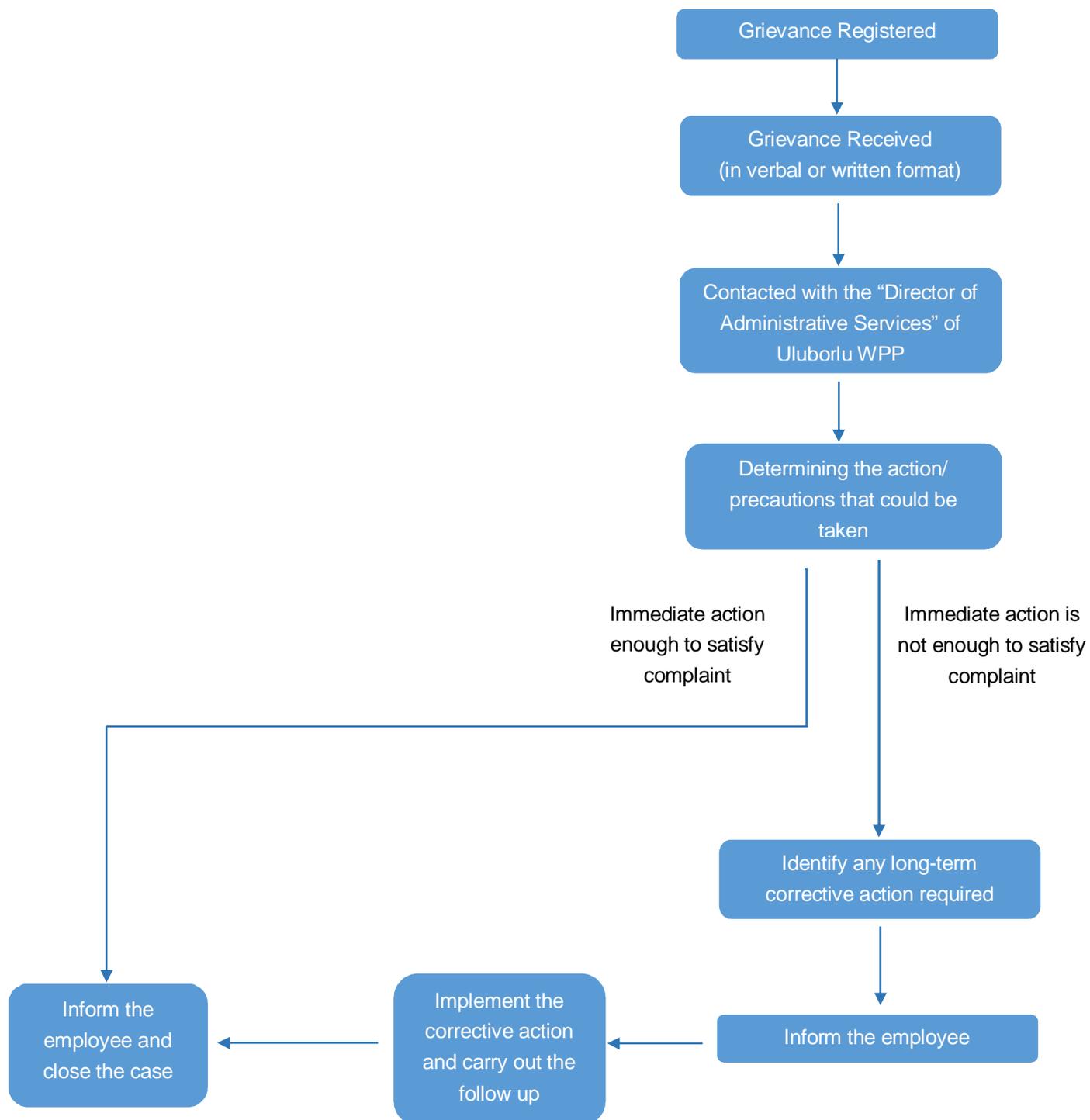
Telephone – All incoming calls will be registered and information summarized daily and sent to the relevant department for processing and action in accordance with the grievance procedure outlined above.

Electronic channels – Stakeholders have the opportunity to send comments, remarks, requests and complaints via the official website of the Company which is www.finaenerji.com. This website of the Company can be used for complaints or opinions and also emails can be sent to yasar.salman@finaenerji.com.tr. A Public Relation Officer (PRO) for the Project is hired for continues engagement and grievance process.

Post-e-mail can be used by stakeholders for submission of their requests, complaints or comments for consideration by the PRO. All incoming letters will be documented and stored as well as the responses sent to the originating party in accordance with the grievance procedure outlined above:

The postal address of the Company is *Kısıklı Cad. Sarkuysan Ak İş Merkezi No:4 Kat:1 A-Blok P.K.34662 Altunizade Üsküdar/İSTANBUL*. Any queries/requests/complaints/comments can be brought to the attention of the Company verbally or written (e-mail) or by filling in a grievance form which will be available in the Project site office.

During Project's construction and operation, flowchart process for grievance is given in Figure 2.

Figure 2: Flowchart for Processing Grievances

Appendix 1: Public Grievance Form

Reference No:	
Full Name	
Contact Information	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____
Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____
Preferred Language for communication	<input type="checkbox"/> [Turkish] <input type="checkbox"/> [English]
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance	
	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature: _____

Date: _____

Please return this form to: Yaşar Salman

Address: Entrance of İleydağı Village, Uluborlu, Isparta, Turkey (Camping Site)

Kısıklı Cad. Sarkuysan Ak İş Merkezi No:4 Kat:1 A-Blok P.K.34662 Altunizade Üsküdar/İSTANBUL (Main Office)

Tel.: +90 216 554 54 00

Fax.: +90 +90 216 474 52 52

E-mail: finaenerji@finaenerji.com.tr

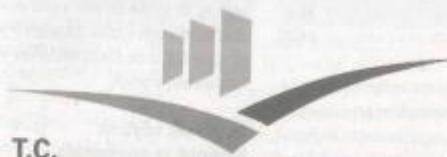
Appendix 2: Workers Grievance Form

Description of Grievance		
<input type="checkbox"/> Corrective Activity / an activity or an accident which has occurred will be reported. <input type="checkbox"/> Preventer Activity / an activity or an accident which might occur will be reported to be prevented (near miss).		
.....		
Anonymous <input type="checkbox"/> Yes <input type="checkbox"/> No		
Name:	Date:/...../.....	Signature:

Suggested precautions to be taken to prevent the action	
.....	
Date:/...../..... Signature: Director of Related Department	Date:/...../..... Signature: Occupational Health and Safety (OHS) Expert

Final Evaluation (Will be filled by OHS Expert)	
Cause of the grievance: Is there any risk assessment for the grievance? Resolving date of grievance:/...../.....	Examination result : Is the grievance resolved : Yes No Precautions are taken : <input type="checkbox"/> <input type="checkbox"/> <i>(If the answer is no grievance form will be filled again)</i> <input type="checkbox"/> <input type="checkbox"/>
Director of Related Department: Date:/...../..... Signature:	OHS Expert: Date:/...../..... Signature:

Appendix 3A: PPM Announcement-National



T.C.
ÇEVRE VE ŞEHİRCİLİK
BAKANLIĞI

T.C.
ÇEVRE VE ŞEHİRCİLİK BAKANLIĞI
DUYURU

Kavram Enerji Yatırım Üretim ve Ticaret A.Ş. tarafından Isparta İli, Uluborlu İlçesi sınırları içerisinde "Uluborlu Rüzgar Enerji Santrali (RES)" projesinin yapılması planlanmaktadır. Söz konusu proje için Çevresel Etki Değerlendirmesi (ÇED) Yönetmeliğinin 9. Maddesi gereğince aşağıda belirtilen tarih ve saatte faaliyetle ilgili halkı bilgilendirmek, görüş ve önerilerini almak için "Halkın Katılımı Toplantısı" yapılacaktır.

Halkımıza saygı ile duyurulur.

Toplantı Yeri : İleydağı Köyü Kahvesi

Toplantı Yerinin Adresi : İleydağı Köyü - Uluborlu/ISPARTA

Toplantı Tarihi : 02.07.2014

Toplantı Saati : 13:30

Proje Sahibi : Kavram Enerji Yatırım Üretim ve Ticaret A.Ş.

Tel : (0 216) 554 54 00
Fax : (0 216) 474 52 52

ÇED Raporunu Hazırlayan Kuruluş: Selin İnşaat Turizm Müşavirlik Sanayi ve Ticaret Ltd. Şti.

Tel : (0 312) 481 33 73
Fax : (0 312) 481 45 85



Appendix 3B: PPM Announcement-Local

E-mail: ispartahaber@gmail.com
<http://www.ispartahabergazetesi.com>



T.C
ÇEVRE VE ŞEHİRCİLİK BAKANLIĞI

DUYURU

Kavram Enerji Yatırım Üretim ve Ticaret A.Ş tarafından Isparta ili, Uluborlu ilçesi sınırları içerisinde "Uluborlu Rüzgar Enerji Santrali (RES)" projesinin yapılması planlanmaktadır. Söz konusu proje için Çevresel Etki Değerlendirmesi (ÇED) Yönetmeliğinin 9. Maddesi gereğince aşağıda belirtilen tarih ve saatte faaliyetle ilgili halkı bilgilendirmek, görüş ve önerilerini almak için "Halkın Katılımı Toplantısı" yapılacaktır.

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Toplantı Yerinin Adresi: İleydağı Köyü – Uluborlu/ ISPARTA

Toplantı Tarihi : 02.07.2014

Toplantı Saati : 13:30

Proje Sahibi : Kavram Enerji Yatırım Üretim ve Ticaret A.Ş

Tel : (0 216) 554 54 00

Fax : (0 216) 474 52 52

ÇED Raporunu Hazırlayan Kuruluş: Selin İnşaat Turizm
Müşavirlik Sanayi ve Ticaret Ltd. Şti.

