



Livelihood Restoration Plan

FALP Wind Power Plant Project

PREPARED FOR

ENERJİSA ÜRETİM

Enerjisa Üretim A.Ş.

DATE

November 2025

REFERENCE

0733614



DOCUMENT DETAILS

DOCUMENT TITLE	Livelihood Restoration Plan
DOCUMENT SUBTITLE	FALP Wind Power Plant
PROJECT NUMBER	0733614
DATE	November 2025
VERSION	003
AUTHOR	ERM Project Team
CLIENT NAME	Enerjisa Üretim A.Ş.

DOCUMENT HISTORY

				ERM APPROVAL TO ISSUE		
VERSION	REVISION	AUTHOR	REVIEWED BY	NAME	DATE	COMMENTS
Draft	000	ERM Project Team			September 2025	
Draft	001	ERM Project Team			October 2025	
Draft	002	ERM Project Team			November 2025	
Final	003	ERM Project Team			November 2025	

Livelihood Restoration Plan

FALP Wind Power Plant Project

0733614

Caner Şahin

Principle Technical Consultant

Serkan Kirdogan

Partner in Charge

ERM GmbH, Brüsseler Str. 1-3

60327 Frankfurt am Main

T: +49 6102 206 0

© Copyright 2025 by The ERM International Group Limited and/or its affiliates ('ERM'). All Rights Reserved.

No part of this work may be reproduced or transmitted in any form or by any means, without prior written permission of ERM.

CONTENTS

1. INTRODUCTION	1
1.1. OBJECTIVES OF THE LRP	1
1.2. SCOPE OF THE LRP	2
1.3. KEY DEFINITIONS	2
1.4. KEY PRINCIPLES	4
1.5. PROJECT BACKGROUND	5
1.6. PROJECT OVERVIEW	5
1.6.1.PROJECT LOCATION	8
1.6.2.PROJECT COMPONENTS	10
1.6.3.PROJECT AREA OF INFLUENCE	11
2. LAND ACQUISITION AND LIVELIHOOD CONTEXT	12
2.1. OVERVIEW OF LAND TYPES AND LEGAL ACQUISITION FRAMEWORK	12
2.1.1.LAND USE, OWNERSHIP, AND PROJECT FOOTPRINT	14
2.2. LAND REQUIREMENTS FOR ASSOCIATED FACILITIES AND INFRASTRUCTURE	17
2.2.1.ENERGY TRANSMISSION LINE	17
2.2.1.1.EXPROPRIATION EFFORTS	18
2.3. ACCESS ROADS	19
3. LEGAL AND REGULATORY FRAMEWORK OF THE LRP	21
3.1. NATIONAL LEGISLATION	21
3.1.1.EXPROPRIATION LAW (LAW NO. 2942)	21
3.1.2.ADDITIONAL APPLICABLE LEGISLATION	22
3.1.3.LAND ACQUISITION PROCESS AS PER THE NATIONAL LAW	23
3.1.4.LAND ACQUISITION APPROACH OF THE PROJECT	26
3.2. INTERNATIONAL APPLICABLE STANDARDS	27
3.3. GAP ASSESSMENT	30
4. INFORMATION SOURCES AND METHODOLOGY	36
4.1. DATA COLLECTION PROCESS OF THE FIELD STUDY	36
4.1.1.DESKTOP STUDIES	37
5. AFFECTED HOUSEHOLDS, LANDS, AND LIVELIHOODS: BASELINE AND IMPACT ANALYSIS	41
5.1. DEMOGRAPHIC STRUCTURE OF THE PROJECT AOI	41
5.2. ECONOMY AND EMPLOYMENT	42
6. LIVELIHOOD IMPACT ASSESSMENT	62

6.1. PROJECT IMPACT SUMMARY	62
6.2. AFFECTED USE OF FOREST, TREASURY AND PRIVATE LANDS	68
IMPACTS ON FOREST AND TREASURY LAND USE & INFORMAL USERS	71
USE OF FOREST LAND (ÇUKUR, ÇOMAKDAĞI, KONAK, SAKARKAYA, SARIKAYA, NARHISAR, İKİZTAŞ, KETENDERE, KAYABÜKÜ)	71
TREASURY LANDS (GÖKYAKA, UMCULAR, CUMALAR, SARIKAYA, GÖLCÜK, ALEYHAN, ABAK, SARAÇLAR)	72
6.3. VULNERABILITY ASSESSMENT	73
7. ELIGIBILITY, ENTITLEMENTS AND COMPENSATION	76
7.1. CUT OFF DATE	76
7.2. ELIGIBILITY	76
7.3. ENTITLEMENT MATRIX	78
8. LIVELIHOOD RESTORATION PROGRAMME	80
8.1. LRP COMPONENTS	80
8.1.1.CASH COMPENSATION PAYMENTS	81
8.1.2.LOCAL EMPLOYMENT OPPORTUNITIES	85
8.1.3.MEASURES DURING CONSTRUCTION	87
8.1.4.TRAINING AND CAPACITY-BUILDING	93
8.1.5.OTHER SUPPORT MEASURES	95
8.2. LRP IMPLEMENTATION SCHEDULE	102
9. ROLES AND RESPONSIBILITIES	104
9.1. KEY PROJECT STAFF	104
9.2. OTHER ACTORS	105
10. LRP STAKEHOLDER ENGAGEMENT	106
10.1. LRP DISCLOSURE	106
10.2. STAKEHOLDER CONSULTATION ACTIVITIES	106
10.3. GRIEVANCE MECHANISM	107
11. LRP BUDGET	112
11.1. KEY BUDGET COMPONENTS	112
11.2. BUDGET ALLOCATION AND MANAGEMENT	113
12. MONITORING AND EVALUATION	115
12.1. OBJECTIVES OF MONITORING AND EVALUATION	115
12.2. MONITORING AND EVALUATION METHODS	115
12.3. MONITORING COMPONENTS	115
12.4. MONITORING NUMBER OF HOUSEHOLDS AND RESPONSIBILITIES	118

LIST OF TABLES

TABLE 1-1	KEY DEFINITIONS	2
TABLE 1-2	LOCATIONS OF THE PLANNED WIND TURBINES	10
TABLE 1-3	COORDINATES AND PROXIMITY OF LRP AOI SETTLEMENTS	12
TABLE 2-1	OVERVIEW OF THE LAND TYPES AND APPLICABLE LEGAL PROCEDURES	13
TABLE 2-2	IMPACTS OF THE PROJECT DUE TO LAND ACQUISITION	14
TABLE 2-3	LAND NEED OF THE PROJECT AND THE LAND ACQUISITION STATUS	15
TABLE 2-3	TURBINE LOCATION AND LAND OWNERSHIP	16
TABLE 2-4	THE OWNERSHIP STATUS OF TEMPORARY LANDS	17
TABLE 3-1	GAP ANALYSIS BETWEEN TURKISH NATIONAL LEGISLATION AND INTERNATIONAL STANDARDS	30
TABLE 4-1	LRP SURVEYS TARGETED AND COMPLETED (JULY 2024)	37
TABLE 4-2	SUPPLEMENTARY INTERVIEWS COMPLETED (MARCH 2025)	38
TABLE 5-1	POPULATION IN PROJECT AFFECTED SETTLEMENTS	41
TABLE 5-2	POPULATION STRUCTURE OF THE ETL AND IMPACTED SETTLEMENTS BY ACCESS ROADS	41
TABLE 5-3	SOURCES OF INCOME IN THE FALP AOI	44
TABLE 5-4	ANNUAL INCOME EXPENSE CATEGORIES	45
TABLE 5-5	ENGAGE IN AGRICULTURAL ACTIVITIES	46
TABLE 5-6	PERCEPTIONS OF PROJECT IMPACT ON AGRICULTURAL ACTIVITIES DUE TO THE PROJECT	47
TABLE 5-7	INCOME LOSS OPINIONS OF THE PAPS	47
TABLE 5-8	USE OF PUBLIC LAND FOR AGRICULTURE	48
TABLE 5-9	TREES ON PUBLIC LAND	48
TABLE 5-10	ENGAGEMENT IN ANIMAL HUSBANDRY	49
TABLE 5-11	NO. OF CATTLE OWNED	49
TABLE 5-12	NO. OF SMALL CATTLE OWNED	50
TABLE 5-13	NO. OF POULTRY OWNED	51
TABLE 5-14	DURATION OF FEED PURCHASES FOR LIVESTOCK ACTIVITIES	51
TABLE 5-15	WHERE ANIMALS ARE FED	52
TABLE 5-16	USE OF PASTURES FOR GRAZING	52
TABLE 5-17	PERCEPTIONS OF PROJECT IMPACT ON PASTURES	53
TABLE 5-18	PRIOR PROJECT IMPACT ON OWNED OR USED LAND	53
TABLE 5-19	ENGAGEMENT ON BEEKEEPING	54

TABLE 5-20 NO OF BEEHIVES OWNED	54
TABLE 5-21 THE LOCATION OF BEEKEEPING ACTIVITIES	55
TABLE 5-22 PERCEPTIONS OF PROJECT IMPACT ON BEEKEEPING	55
TABLE 5-23 PERCEPTIONS OF PROJECT IMPACT ON BEEKEEPING AND HUSBANDRY	56
TABLE 5-24 PAPS' UTILIZATION OF SURROUNDING FORESTS	58
TABLE 5-25 FOREST PRODUCTS COLLECTED	58
TABLE 5-26 PERCEPTIONS OF PROJECT IMPACT ON FORESTS	59
TABLE 5-27 EFFECTS OF THE PROJECT ON FOREST LANDS	59
TABLE 6-1 IDENTIFIED LIVELIHOOD-RELATED IMPACTS AND PROJECT PHASES	63
TABLE 6-2 SOCIO-ECONOMIC IMPACTS – LAND AND LIVELIHOODS	67
TABLE 6-3 THE SETTLEMENTS LIKELY TO BE AFFECTED BY THE ETL AND ACCESS ROADS	68
TABLE 6-4 STATE FORESTS USAGE INFORMATION	72
TABLE 6-5 TYPES OF ANTICIPATED DAMAGE AND IMPACTS	73
TABLE 6-6 VULNERABLE HOUSEHOLDS	74
TABLE 7-1 ELIGIBLE CATEGORIES OF PAPS	77
TABLE 7-2 ENTITLEMENT MATRIX	78
TABLE 8-1 LIVELIHOOD RESTORATION PROGRAMME OVERVIEW	80
TABLE 8-2 COMPENSATION PAYMENTS	84
TABLE 8-3 LOCAL EMPLOYMENT	86
TABLE 8-4 ANIMAL GRAZING AND BEEKEEPING SUPPORT MEASURES	92
TABLE 8-5 TRAINING AND CAPACITY BUILDING	94
TABLE 8-6 VULNERABLE GROUP ENGAGEMENTS FOR LRP SUPPORTS	99
TABLE 8-7 VULNERABLE GROUPS – ENTITLEMENTS UNDER LRP (LIVELIHOOD RESTORATION MEASURES)	99
TABLE 8-8 OTHER SUPPORT MEASURES	101
TABLE 8-9 LRP IMPLEMENTATION TIMELINE	103
TABLE 9-1 ROLES AND RESPONSIBILITIES	104
TABLE 11-1 LRP BUDGET ESTIMATE	114
TABLE 12-1 PROJECT MONITORING	116
TABLE 12-2 MONITORING NUMBER OF HOUSEHOLDS AND RESPONSIBILITIES	118

LIST OF FIGURES

FIGURE 1-1 PROJECT LAYOUT	7
FIGURE 1-2 NEAREST SETTLEMENTS MAP	9

ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AoI	Area of Influence
Client	Enerjisa Üretim A.Ş. (Enerjisa Üretim)
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EMRA	Energy Market Regulatory Authority
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GIIP	Good International Industry Practice
GIS	Geographic Information System
GM	Grievance Mechanism
ha	Hectares
HR	Human Resources
IFC	International Finance Corporation
ILO	International Labor Organization
KPIs	Key Performance Indicators
LRP	Livelihood Restoration Plan
PAP	Project Affected Person
PS	Performance Standard
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
TMP	Traffic Management Plan
WPP	Wind Power Plant

1. INTRODUCTION

Environmental Resources Management GmbH (ERM) was contracted by Enerjisa Enerji Üretim A.Ş., (hereinafter “Enerjisa Üretim” or “the Client”) to develop this Livelihood Restoration Plan (LRP) (hereinafter “LRP” or “the Plan”) for the FALP Wind Power Plant Project (hereinafter “the Project” or “FALP WPP”).

The LRP has been developed in accordance with the European Bank for Reconstruction and Development (EBRD)’s Environmental and Social Policy (2024) and in particular its Environmental and Social Requirement 5 (ESR5) on Land acquisition, restrictions on land and involuntary resettlement. As the Project does not involve any physical displacement or resettlement of households, a full Resettlement Action Plan (RAP) is not required. Instead, an LRP has been prepared to specifically address economic displacement impacts, including potential losses of land-based livelihoods, access restrictions, and associated vulnerabilities.

The purpose of this LRP is to identify, assess and mitigate the adverse impacts of land acquisition and land use restrictions on people’s livelihoods, particularly in rural areas where subsistence and income-generating activities rely heavily on agricultural land, pasture, and forest resources. The Plan has been prepared based on baseline studies, stakeholder engagement, and site-specific assessments to ensure that any loss of land or access to resources is addressed through appropriate mitigation measures and livelihood support.

The LRP outlines the principles, mitigation strategies, institutional responsibilities, eligibility criteria, and entitlements for affected people, in alignment with EBRD’s requirements and good international practice. It also provides a monitoring framework to ensure that the effectiveness of the proposed measures is tracked over time and adjusted as needed.

The FALP Wind Power Plant Project is located in Muğla Province, Türkiye, and primarily affects the settlements of, Çukur and Konak, in the Milas District along side with Saraçlar and Sarıkaya that are affected by expropriation and land acquisition. These settlements fall within the Project’s Area of Influence (AoI) and are characterized by rural livelihoods including small-scale agriculture, livestock grazing, and seasonal use of forest lands. All planned turbine locations and temporary use areas are situated on state forest lands, as designated in the relevant cadastral and environmental planning documents. While most of the land to be used is public forest land, additional land requirements for access roads and the energy transmission line may involve privately-owned parcels and lead to land acquisition processes in accordance with national legislation.

This introductory chapter provides further information on the Project background, its location, and the aim and scope of this LRP.

1.1. OBJECTIVES OF THE LRP

The main aims of this LRP is to:

- Identify households and individuals whose livelihoods may be adversely affected by the Project's land acquisition, easement rights, or restricted access to land and natural resources.
- Assess the nature and extent of livelihood-related impacts, including those related to agricultural lands, grazing areas, forest use, and informal land-based activities.
- Propose appropriate livelihood restoration measures in line with international standards (including IFC PS5 and EBRD ESR5) and national legal requirements.
- Ensure that affected people are compensated fairly and restored, at minimum, to pre-project levels of livelihood, with special attention to vulnerable groups.

1.2. SCOPE OF THE LRP

The scope of this LRP covers:

- All Project components requiring land acquisition or access such as turbine locations, access roads, construction camps, and associated facilities (energy transmission lines;)
- Both formal and informal land users, including those without legal land titles but who may face economic displacement;
- Direct and indirect livelihood impacts, including those resulting from changes in land use, resource availability, or access restrictions;
- Coordination with ongoing environmental and social mitigation efforts described in the Project's Environmental and Social Impact Assessment (ESIA).

1.3. KEY DEFINITIONS

This section provides definitions of key terms used throughout this LRP. The terms are consistent with the terminology used by the EBRD and reflect good international resettlement practice, particularly as outlined in EBRD ESR5. The following key definitions presented in Table 0-1.

TABLE 0-1 KEY DEFINITIONS

Term	Definition
Area of Influence (AoI)	The geographic area affected by the Project, including direct and indirect social, environmental, and economic impacts.
Affected Person / Household / Community	Any person, household, or community who loses the right to own, use, or otherwise benefit from land, property, or resources—either partially or fully, temporarily or permanently—due to Project activities.
Compensation	Payment in cash or in kind to restore assets or resources lost as a result of the Project, based on full replacement cost.
Cut-off Date	The date after which improvements to land or assets (such as structures or crops) are not eligible for compensation. Used to prevent opportunistic claims.
Economic Displacement	Loss of income or livelihood resulting from Project-related land acquisition or access restrictions, without physical relocation.

Term	Definition
Eligibility	The right to receive compensation or livelihood assistance based on defined criteria, such as land tenure or asset ownership at cut-off date.
Entitlement Framework / Matrix	A structured list identifying all categories of affected persons and their corresponding entitlements to compensation and assistance.
Forced Evictions	Involuntary removal of individuals or groups from land or housing without legal safeguards, consultation, compensation, or access to remedies. Prohibited under EBRD and IFC standards.
Full Replacement Cost	The market value of lost assets plus transaction costs (e.g., fees, taxes, relocation costs), ensuring no financial loss for the affected person.
Grievance Mechanism	A formal process to receive, assess, and resolve concerns or complaints from affected stakeholders in a timely and transparent manner.
Head of Household	The primary decision-maker or income provider in a household unit, responsible for the welfare of its members.
In-kind Compensation / Replacement	The replacement of lost assets with similar goods or services (e.g., a new house instead of cash).
Involuntary Resettlement	Displacement that occurs without the informed consent of the affected persons, and includes both physical and economic displacement.
Land Acquisition	The process by which land is obtained for the Project through purchase, expropriation, lease, or other means.
Land Expropriation	Compulsory acquisition of land or rights by public authorities, typically with compensation, for public interest or development purposes.
Livelihood	The full range of income-generating activities and means of subsistence used by individuals, families, or communities.
Livelihood Improvement and Restoration	Measures to restore or improve the incomes, production levels, and living standards of economically displaced persons.
Livelihood Restoration Plan (LRP)	A formal document outlining measures to restore affected persons' livelihoods and entitlements in a transparent and equitable manner.
Negotiated Settlement	A voluntary agreement between the Project and land users or owners to acquire land or rights without recourse to expropriation.
Physical Displacement / Resettlement	Loss of housing requiring relocation of affected persons to a new physical location.
Private Property Owners	Individuals or entities holding legal title to land, structures, or other assets, and entitled to compensation under applicable law.
Project-Affected Household (PAH)	A household that loses land, structures, access to resources, or income sources due to Project activities—permanently or temporarily.
Project-Affected Person (PAP)	An individual affected by the Project through loss of land, structures, crops, income, or access—partially or fully, permanently or temporarily.
Replacement Cost	The amount needed to replace lost assets with those of equal quality and utility, including transaction costs and restoration to pre-Project condition.
Resettlement	The overall process involving physical and economic displacement, compensation, livelihood support, and relocation assistance.

Term	Definition
Stakeholders	Individuals, groups, or institutions affected by or interested in the Project and its outcomes.
Transaction Costs	Costs associated with acquiring replacement land or assets (e.g., taxes, registration, permits, legal fees).
Transitional Allowance / Assistance	Temporary financial or material support provided to affected persons during the period of economic recovery or re-establishment.
Vulnerable Groups	Persons who are more likely to be adversely affected by Project impacts due to their gender, age, poverty, disability, ethnicity, or other marginal status.

1.4. KEY PRINCIPLES

The Project LRP has been developed in alignment with the principles set out in the applicable standards (see Chapter **Error! Reference source not found.**), and reflects the following key principles:

- **Avoidance and Minimization of Displacement:** The Project design prioritizes the avoidance of physical and economic displacement wherever feasible. When displacement is unavoidable, measures are taken to minimize its scale and adverse impacts through careful planning and stakeholder engagement.
- **No Forced Evictions:** No individual or community shall be subject to forced eviction or displacement. All land acquisition and related activities are undertaken lawfully, transparently, and with the informed consent of affected persons.
- **Compensation at Full Replacement Cost:** Affected persons are compensated for lost assets at full replacement cost, ensuring that their standard of living is restored or improved compared to pre-project conditions.
- **Livelihood Restoration and Improvement:** The Project commits to restoring, and where possible improving, the livelihoods and living standards of all economically displaced persons through tailored livelihood restoration measures.
- **Meaningful Consultation and Participation:** Affected persons are engaged in a meaningful, inclusive, and culturally appropriate manner throughout the process.
- Their views and feedback are considered in planning, implementation, and monitoring of LRP activities.
- **Particular Attention to Vulnerable Groups:** Special measures are implemented to identify and assist vulnerable individuals or households, ensuring they are not disproportionately affected and have equal access to project benefits.
- **Transparency and Grievance Redress:** Clear information on entitlements, procedures, and timelines is disclosed to all stakeholders. A grievance mechanism is in place to address complaints promptly, fairly, and without retribution.
- **Monitoring and Adaptive Management:** Implementation of the LRP is regularly monitored and evaluated to ensure commitments are met. Adaptive management approaches are applied to address emerging issues and improve effectiveness.

1.5. PROJECT BACKGROUND

The FALP Wind Power Plant Project is planned to be developed in Muğla Province, within the Milas District. The Project includes the installation of 18 wind turbines, each with a capacity of 4.2 MWm/4.2 MWe and aims to generate an estimated annual electricity output of 257,720,400 kWh. The project site is classified as "Forest Area" according to the Aydın-Muğla-Denizli Planning Region 1/100,000 Scale Environmental Layout Plan.

All turbine locations and associated temporary land use areas (e.g., excess excavation material storage areas) are situated on state forest lands. Additional land will be required for the construction of access roads and the energy transmission line (ETL). In cases where private land may be impacted, land acquisition will be carried out in accordance with the Expropriation Law No. 2942, as per national regulations governing public interest projects.

As per Turkish regulatory requirements, an Environmental Impact Assessment (EIA) was conducted for the Project. The EIA Report was prepared by a certified national consultancy, and the Ministry of Environment, Urbanization and Climate Change (MoEUCC) issued an "EIA Positive" decision on 6 June 2024.

The closest protected area to the EIA Study Area is Kartal Lake Nature Park, located 5.3 km northwest of the site. Other nearby conservation areas include Yılanlı Çakmak Wildlife Development Area (7.5 km), Köyceğiz Wildlife Development Area (15.5 km), and Marmaris National Park (17.5 km).

1.6. PROJECT OVERVIEW

The Project includes the installation of 18 wind turbines, each with a capacity of 4.2 MWm/4.2 MWe. The total installed capacity of the facility will be 75.6 MWm/75.6 MWe, with a projected annual electricity generation of approximately 257,720,400 kWh. Enercon E-138 EP3 E2 / IEC S Class model turbines will be used, each with a tower height of 81 meters and a rotor diameter of 138 meters.

The directly affected settlements include Çukur and Konak, in the Milas District alongside with Saraçlar and Sarıkaya that are affected by expropriation and land acquisition. In addition, several other villages will be affected by linear infrastructure components such as access roads and the energy transmission line.

The construction phase of the Project is expected to last 17 months, with a peak workforce of 250 personnel planned to be employed during construction and 10 personnel during the operational phase. As of October 2025, a total of 172 personnel is currently employed for the Project.

Accommodation during the construction phase will be provided at rented houses in the vicinity and a mobilization area will be used for office and welfare purposes. According to the information provided by the Client, mobilization activities started in April 2025. The Project is planned to become fully operational by June 2026. The economic lifespan of the Project is projected to be 49 years. Commissioning and full operation of the plant are targeted by mid-2026, subject to permitting and construction timelines. Upon reaching the end of its technical lifespan, the Project may be modernized and extended in line with national legislation and emerging technologies.

The settlement areas within the Project's Area of Influence are socio-economically and administratively connected to Milas District. Therefore, the socio-economic profile and development dynamics of Milas and Muğla broadly influence the context of the Project area.

The layout of the Project is given in Figure 0-1.

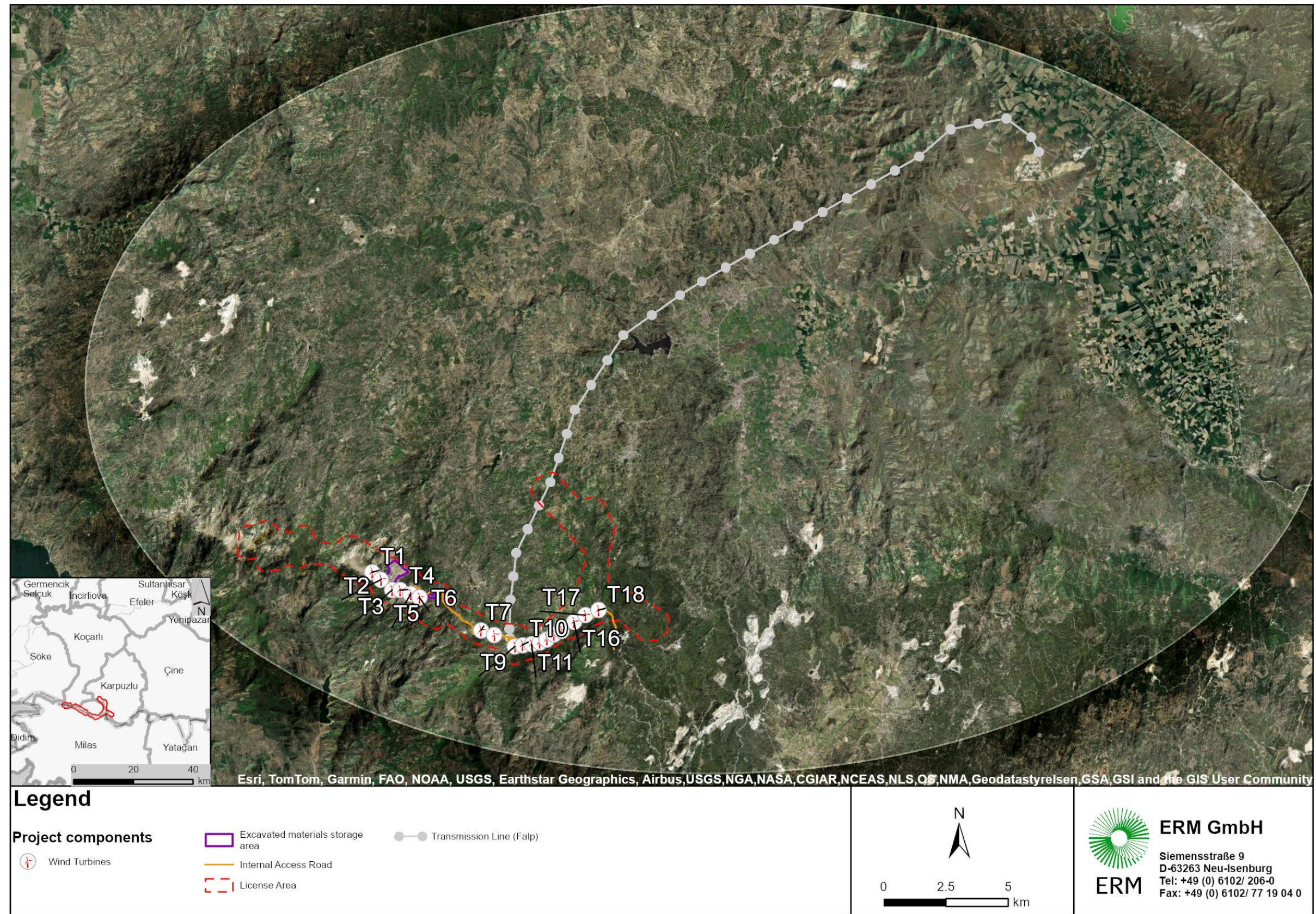


FIGURE 0-1 PROJECT LAYOUT

1.6.1. PROJECT LOCATION

The FALP WPP will be developed within the administrative boundaries of Muğla Province (Milas District) and Aydın Province (Karpuzlu District), with approximately 90% of the Project footprint located in Muğla. According to the Aydın-Muğla-Denizli Planning Region 1/100,000 Scale Environmental Layout Plan, the majority of the Project area is designated as "Forest Area".

The closest settlements within a 3 km buffer of the Project boundary include:

- Çukur Neighborhood – approximately 1.2 km southeast of the Project boundary;
- Konak Neighborhood – approximately 1.3 km southwest;

These neighborhoods form the core part of the Project's Area of Influence due to their proximity and socio-economic interlinkages with the land required for turbines, access roads, and the energy transmission line.

The nearest settlements are presented in Figure 0-2.

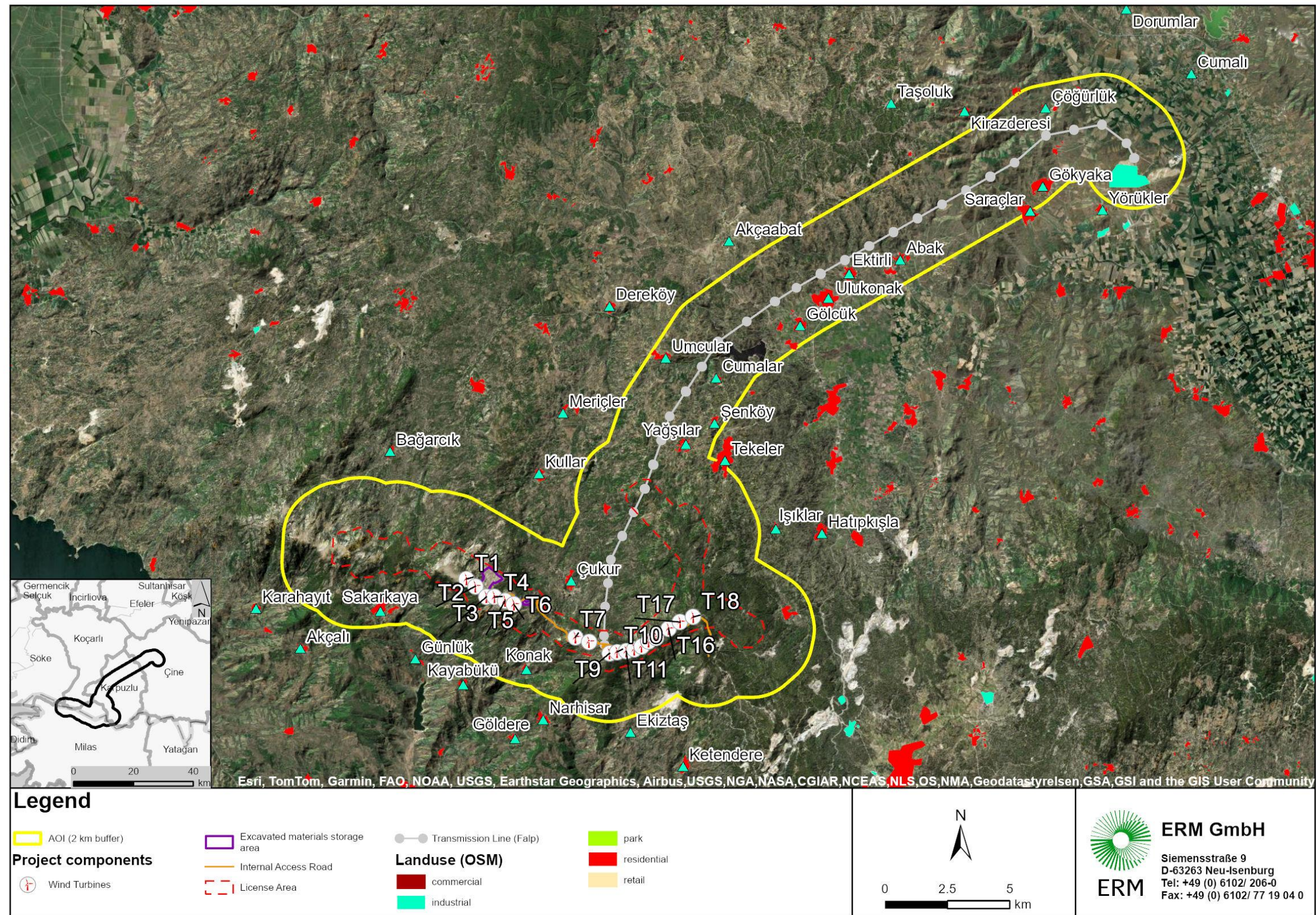


FIGURE 0-2 NEAREST SETTLEMENTS MAP

The coordinates of the planned wind turbines are given in Table 0-2 below.

TABLE 0-2 LOCATIONS OF THE PLANNED WIND TURBINES

Wind Turbine No.	Coordinates (UTM - 6 degrees ED50)
T1	559104, 4150330
T2	559459, 4150039
T3	559901, 4149615
T4	560224, 4149610
T5	560789, 4149458
T6	561103, 4149510
T7	563393, 4147995
T8	564007, 4147818
T9	564833, 4147286
T10	565132, 4147414
T11	565499, 4147438
T12	565818, 4147513
T13	566110, 4147639
T14	566393, 4147837
T15	566693, 4147979
T16	567195, 4148339
T17	567731, 4148482
T18	568165, 4148714

1.6.2. PROJECT COMPONENTS

In addition to the turbine locations, several settlements will be affected by the Project's linear infrastructure components. The villages of Gökyaka, Saraçlar, Ektirli, Ulukonak, Gölcük, Umcular, Cumalar, Abak, Şenköy, and Çukurköy are likely to be impacted by the construction and operation of the energy transmission line (ETL). Notably, Çukurköy will be exposed to multiple project components including turbine proximity, ETL corridor, and camp area and is therefore expected to face cumulative impacts.

Three villages, Sarıkaya, Kırcağız, and Kargıcak have been identified as potentially impacted by the transportation roads that will be used during construction. The road improvement works will be carried out by the General Directorate of Highways (KGM). While KGM's study officially covers only Kırcağız and Kargıcak, stakeholder consultations in Sarıkaya have indicated that some privately owned lands may also be affected due to road realignment or widening.

As such, all these settlements have been considered in the Livelihood Restoration Plan and the social impact assessment process to ensure inclusive engagement, risk mitigation, and fair compensation where applicable.

1.6.3. PROJECT AREA OF INFLUENCE

The Area of Influence (AoI) for the LRP of the FALP WPP Project has been defined specifically from a social perspective, focusing on settlements and land users that may be directly or indirectly affected by land acquisition, access restrictions, and other Project-induced impacts relevant to livelihoods.

While the overall Project AoI defined in the ESIA considered a broader scope encompassing biophysical receptors, the LRP AoI has been refined to address the specific geographies where land-based livelihoods may be impacted and where restoration or compensation measures may be required.

The LRP AoI includes:

- Areas where land is permanently or temporarily acquired for turbines, access roads, energy transmission lines (ETL), and construction facilities (e.g., camps and storage areas);
- Settlements in proximity to the Project footprint that may experience access limitations to forest areas, communal lands, or other productive assets;
- Villages that may be indirectly affected through increased traffic, labor influx, changes in local markets, or employment opportunities associated with Project construction and operation

Based on fieldwork, stakeholder engagement, and ESIA findings, the following settlements have been identified as part of the LRP AoI:

- **Çukur:** Located 1.2 km from the turbine site, this neighborhood is one of the most proximate to multiple project components, including turbines, temporary use areas, and construction access routes. Forest-based and agricultural livelihood practices may be affected by restricted access or disturbance. This village is expected to face cumulative impacts due to its exposure to multiple project components, turbines, the ETL corridor, and construction camp areas.
- **Konak:** At 1.3 km distance, Konak is affected by nearby turbine installations and the planned switchyard area. Disruption to local roads and increased vehicle movement may affect farming activities.
- **Narhisar:** Located 2.8 km from the Project boundary, Narhisar lies close to access roads and may be exposed to traffic safety concerns and loss of informal grazing land.

In addition, the following settlements are expected to be affected by linear infrastructure components and are therefore included in the LRP AoI:

- **Energy Transmission Line (ETL):** Gökyaka, Saraçlar, Ektirli, Ulukonak, Gölcük, Umcular, Cumalar, Abak, Şenköy, and Çukurköy;
- **Transport Routes:** Sarıkaya, Kırcağız, and Kargıcak. While road improvements are under the authority of the General Directorate of Highways (KGM), stakeholder

consultations—particularly in Sarıkaya—have raised concerns regarding potential impacts on privately owned lands

These settlements have been included in the LRP AoI to ensure that all potentially affected individuals whether economically displaced, access-restricted, or indirectly impacted—are considered in the design of compensation and livelihood restoration measures. One of the limitations was that the LRP was developed without the final routing for the ETL. Since the ETL route has been finalized as of October 2025, an additional study for the livelihood impacts will be conducted for the final ETL route and annexed to this LRP.

The coordinates and proximity of each neighborhood to the Project boundary are summarized in Table 0-3.

TABLE 0-3 COORDINATES AND PROXIMITY OF LRP AOI SETTLEMENTS

Neighborhood	District	Distance to Project Boundary	Latitude	Longitude
Çukur	Milas	1.20 km	37°29'35.47"N	27°42'56.31"E
Konak	Milas	1.30 km	37°27'52.91"N	27°41'39.73"E
Narhisar	Milas	2.80 km	37°26'46.69"N	27°42'13.32"E

Source: Local EIA Report and March 2025 Fieldwork

2. LAND ACQUISITION AND LIVELIHOOD CONTEXT

This section outlines the legal framework, nature, and scale of land acquisition undertaken for the Project and examines the associated impacts on local livelihoods. It also provides a description of land use patterns, types of affected assets, and the socio-economic characteristics of Project-Affected Persons (PAPs). Understanding the intersection between land acquisition and livelihood dynamics is essential for ensuring that displacement, whether physical or economic, is addressed in line with EBRD Environmental and Social Requirement 5 (ESR5), through timely compensation and targeted livelihood restoration support.

2.1. OVERVIEW OF LAND TYPES AND LEGAL ACQUISITION FRAMEWORK

The FALP WPP area includes primarily state-owned forest lands, alongside potential use of privately owned lands and parcels for linear infrastructure. Each land type is governed by distinct legal and administrative procedures regarding access, acquisition, and use rights.

- **State Forest Land:** All identified turbine locations, as well as the switchyard and excess excavation material storage areas, are located on state forest lands registered in the cadastral system. These parcels fall under the jurisdiction of Forest Law No. 6831, and their use for energy generation purposes requires a long-term usufruct right (typically 49 years) granted by the Ministry of Agriculture and Forestry.
- **Privately Owned Lands:** Private land is not anticipated to be directly affected by the turbine sites. However, some sections of the access roads, particularly in Sarıkaya village, may require expropriation of privately owned parcels, as identified through stakeholder consultations. These roads are planned to be improved by the

General Directorate of Highways (KGM), but detailed alignment studies are still ongoing. In accordance with Turkish Expropriation Law No. 2942, expropriation will be carried out in case of failure to reach voluntary agreement. For IFC compliance (PS5), compensation must be provided at full replacement cost, including for any crops, trees, or other productive assets on the affected land. A detailed Census and Asset Inventory will be conducted once final land requirements are confirmed.

- **Transmission Line and Road Corridors:** The energy transmission line (ETL) will pass through multiple villages, including Çukurköy in Muğla province and Gökyaka, Cumalar, Şenköy, Yağışlar, Akçaabat, Gölcük, Aleyhan, Ektirli, Abak, and Saraçlar in Aydın district. The ETL route has been finalized and includes 499 parcels (410 of which are privately owned). Relevant acquisition processes ranging from usufruct rights to expropriation will be initiated based on land type and applicable legal provisions.

The Client is committed to aligning all land acquisition procedures with national law and IFC PS5 and EBRD ESR5, ensuring that all economically displaced individuals or users are fairly compensated and supported through livelihood restoration measures.

Across all land types, the PAPs include:

- Legal landowners (with registered title deeds);
- Informal users of treasury and forest lands, such as seasonal livestock grazers or fuelwood collectors, beekeepers;
- Tenants or renters of private lands, where land is used for agricultural production.

Where PAPs use state-owned or treasury lands informally, their loss of access or productivity will be addressed through targeted livelihood restoration measures, described in Chapter 6.

Table 0-4 below provides an overview of the land types and applicable legal procedures:

TABLE 0-4 OVERVIEW OF THE LAND TYPES AND APPLICABLE LEGAL PROCEDURES

Land Type	Project Use / Affected Components	Legal Owner	Applicable Law / Regulation	Acquisition Procedure	PAPs
State Forest Land	Wind turbine sites, switchyard and excess excavation material storage areas are located on registered forest parcels.	Ministry of Agriculture & Forestry	Forest Law No. 6831	Long-term usufruct permit (49 years) via Ministry approval	Yes – potential informal users (forest-dependent)
Private Land	Affected primarily for access roads, especially in Sarıkaya village where	Private individuals / legal persons	Expropriation Law No. 2942	Expropriation (full compensation at replacement cost)	Yes – legal owners, possibly tenants

Land Type	Project Use / Affected Components	Legal Owner	Applicable Law / Regulation	Acquisition Procedure	PAPs
	realignment may affect private parcels.				
Mixed Ownership (ETL)	499 parcels (410 of which are privately owned).	Mixed (Forest, Treasury, Private)	Forest Law / National Real Estate Law / Law No. 2942	Depending on land status: permit, easement, or expropriation	Yes – depending on land type and use

2.1.1. LAND USE, OWNERSHIP, AND PROJECT FOOTPRINT

The FALP WPP is primarily situated on state-owned forest lands within the administrative boundaries of Milas District (Muğla Province) and Karpuzlu District (Aydın Province). According to the Aydın-Muğla-Denizli 1/100,000 Scale Environmental Layout Plan, the Project area is designated as "Forest Area"

All wind turbine sites, temporary use areas (e.g., excess excavation material storage areas), and the switchyard are located on forest lands under the jurisdiction of the Ministry of Agriculture and Forestry. These lands require long-term use permits (49 years) to be granted in accordance with Forest Law No. 6831, following site-specific applications and approvals.

Beyond the turbine installations, the Project requires additional land for linear infrastructure, including:

- **Access roads**, particularly in Sarıkaya, Kırcağız, and Kargıcak, which may affect privately owned parcels,
- **Energy Transmission Line (ETL)** corridors crossing multiple settlements such as Çukurköy in Muğla province and Gökyaka, Cumalar, Şenköy, Yağışlar, Akçaabat, Gölcük, Aleyhan, Ektirli, Abak, and Saraçlar in Aydın district.
- **Construction camps and storage areas.**

These components intersect various land types, including state forest lands, treasury lands, and potentially private parcels. Depending on final ownership status and usage, the applicable acquisition mechanisms include:

- Usufruct permits (for forest),
- Easement rights (for treasury),
- Expropriation (for private).

Project-affected settlements and the nature of land-related impacts are presented in Table 0-5. Table 2-3 presents the land the need of the Project with their land acquisition status.

TABLE 0-5 IMPACTS OF THE PROJECT DUE TO LAND ACQUISITION

Project Affected Settlements	Type of Impact
Sarıkaya, Kargıcak	Access road realignment –private land impact

Project Affected Settlements	Type of Impact
Gökyaka, Şenköy, Yağışlar, Cumalar, Gölcük, Çukur, Akçaabat, Aleyhan, Ektirli, Abak, Saraçlar	ETL crossing – forest/trespass risk areas

Source: Local EIA , Project Maps, and March 2025 Field Observations

TABLE 0-6 LAND NEED OF THE PROJECT AND THE LAND ACQUISITION STATUS

Project Component	Total Number of parcels affected	Total area affected (ha)	# of Private parcels	#Public (forest/treasury)	Type of impact	Land acquisition Status
Total turbine platform	7	32.31	-	7 (Forest)	Permanent Land acquisition	Use rights for energy generation purposes are granted through a long-term (49-year) permit in line with Article 17 of the Forest Law No. 6831.
Total Area for Access Road	6	67.12	2	1 (Treasury, 3 (Forest)	Permanent land acquisition for private parcels	
Switchyard area	1		-	1 (Forest)	Permanent	Use rights for energy generation purposes are granted through a long-term (49-year) permit in line with Article 17 of the Forest Law No. 6831. The final forest permit required under Article 17 of the Forest Law has been obtained.
Mobilization Area	1	Not available	-	1 (Treasury)	Temporary	Lease agreements were signed for 1

Project Component	Total Number of parcels affected	Total area affected (ha)	# of Private parcels	#Public (forest/treasury)	Type of impact	Land acquisition Status
						year by contractors.
Total Excess Excavation Material Storage Area (if needed)	-	-	-	-	Temporary	Excavation and filling are balanced.
Sub-total for project	13	99.43	2	11*	-	-
ETL (Poles)	499	34.95	410	89	Permanent for poles	within TEİAŞ's scope of authority
ETL (Cable)		38.44			Easement rights (with land use restrictions)	

**The numbers were not summed directly since some of the turbines, roads, and switchyard are located on the same parcel, in other words, they are overlapping.

Summary of turbine location and land ownership status is presented in Table 0-7 below.

TABLE 0-7 TURBINE LOCATION AND LAND OWNERSHIP

Turbine	Province	District	Neighborhood	Block	Parcel	Property Status
T1	Muğla	Milas	Sakarkaya	308	1	Forest
T2	Aydın	Koçarlı	Kullar	101	1	Forest
T3	Muğla	Milas	Sakarkaya	308	1	Forest
T4	Muğla	Milas	Sakarkaya	308	1	Forest
T5	Muğla	Milas	Sakarkaya	308	1	Forest
T6	Muğla	Milas	Çukur	204	1	Forest
T7	Muğla	Milas	Konak	154	1	Forest
T8	Muğla	Milas	Konak	154	1	Forest
T9	Muğla	Milas	Konak	154	1	Forest
T10	Muğla	Milas	Çukur	204	1	Forest
T11	Muğla	Milas	Çukur	204	1	Forest
T12	Muğla	Milas	İkiztaş	259	2	Forest

Turbine	Province	District	Neighborhood	Block	Parcel	Property Status
T13	Muğla	Milas	Çukur	204	1	Forest
T14	Muğla	Milas	Çukur	204	1	Forest
T15	Muğla	Milas	İkiztaş	259	2	Forest
T16	Muğla	Milas	İkiztaş	259	2	Forest
T17	Muğla	Milas	Çukur	204	1	Forest
T18	Aydın	Karpuzlu	Hatıpkışla	126	1	Forest

Source: Local EIA (May 2024)

2.2. LAND REQUIREMENTS FOR ASSOCIATED FACILITIES AND INFRASTRUCTURE

While the wind turbine sites of the FALP Project are primarily located on registered state forest land, additional land is required for the development of associated facilities such as access roads, the energy transmission line (ETL), and temporary construction infrastructure. These additional components intersect treasury-owned land, privately owned parcels, and unregistered plots. Therefore, a combination of long-term permits, easement rights, and expropriation procedures are being applied in accordance with the applicable legislation.

The project will require land for temporary use. The ownership status of these areas is shown in Table 0-8.

TABLE 0-8 THE OWNERSHIP STATUS OF TEMPORARY LANDS

Area	Province	District	Settlement	Land	Parcel	Land type
Excess excavation material storage area - 1	Aydın	Koçarlı	Kullar	101	1	Forest
Excess excavation material storage area - 2	Aydın	Milas	Sakarkaya	308	1	Forest
Excess excavation material storage area - 3	Muğla	Milas	Çukur	204	1	Forest
Switchyard	Muğla	Milas	Konak	154	1	Forest

Source: Local EIA

2.2.1. ENERGY TRANSMISSION LINE

In Türkiye, the construction and operation of Energy Transmission Lines (ETLs) fall under the authority of the Turkish Electricity Transmission Corporation (TEİAŞ). TEİAŞ is the

ultimate responsible body for project approval, land acquisition and easement establishment, construction management, and long-term operation of ETLs. The Project Company has prepared the design and undertaken preparatory works on behalf of TEİAŞ; however, ownership, accountability, and regulatory authority throughout the process remain with TEİAŞ. Although construction and operation of the ETLs fall under TEİAŞ responsibility, in order to expedite the ETL completions in parallel with the WPP construction schedule, Enerjisa Üretim executes the construction on behalf then, hands-over to TEİAŞ.

The ETL route for the FALP Project has been approved and finalized. According to the latest design, it passes through several settlements, including Gökyaka, Saraçlar, Ektirli, Ulukonak, Gölcük, Umcular, Cumalar, Abak, Şenköy, and Çukur. The land types along the ETL corridor include state forest land, treasury land, and potentially private parcels. Cadastral clarification is in progress, and the final alignment will establish the definitive list of land parcels and their legal status. Approximately, 499 parcels (410 of which are private) will be affected by the development of the ETL.

For treasury lands, easement rights will be applied to allow legal use of land for transmission infrastructure, without transferring ownership. In the case of privately owned parcels, easement expropriation will be conducted under Law No. 2942. These rights allow the Project to use the land for aboveground or underground infrastructure while the ownership remains unchanged. Landowners are compensated at full replacement cost in accordance with IFC Performance Standard 5 (PS5).

Many of the forested areas intersected by the ETL are economically important to local communities, particularly for seasonal grazing, fuelwood gathering, and the collection of non-timber forest products, especially Mediterranean stone pine nuts.

2.2.1.1. EXPROPRIATION EFFORTS

Under EBRD Environmental and Social 5 (ESR5), compensation for parcels expropriated by a national government must follow principles that ensure fairness and livelihood restoration. The process should aim to avoid or minimize displacement, and when unavoidable, affected persons must receive compensation at full replacement cost, including transaction fees, without deductions for depreciation. Compensation must be provided before displacement occurs, and the project sponsor is responsible for ensuring that government-led expropriation aligns with PR5 standards. This includes verifying that compensation is adequate, timely, and that vulnerable groups are protected. Additionally, negotiated settlements are preferred, provided they are transparent and based on informed consent.

Under EBRD ESR5, informal land users are still entitled to compensation and support if they are displaced (physically or economically) due to expropriation. PR5 emphasizes that all affected persons, regardless of legal status, must be treated fairly and compensated at full replacement cost for lost assets and livelihoods. This includes support for restoring or improving living standards and income sources. Enerjisa Üretim must ensure that informal users are identified early, consulted meaningfully, and provided with appropriate

resettlement assistance and livelihood restoration measures, even if the expropriation is carried out by a national government.

In Türkiye, the construction and operation of ETLs fall under the authority of the Turkish Electricity Transmission Corporation (TEİAŞ). TEİAŞ is the ultimate responsible body for project approval, land acquisition and easement establishment, construction management, and long-term operation of ETLs. The Project Company has prepared the design and undertaken preparatory works on behalf of TEİAŞ; however, ownership, accountability, and regulatory authority throughout the process remain with TEİAŞ. Since the ETLs belong to TEİAŞ, the entire expropriation process is being carried out by TEİAŞ. However, in cases where Enerjisa Üretim need to expedite the process to start pole installations at site earlier, Enerjisa Üretim may hold negotiations with the landowners of the parcels where the poles will be located, prior to the expropriation. In such cases, consent forms may be signed in exchange for payments made to the landowners based on a pre-determined amount per pole. The ETL route has been finalized as of October 2025

As part of the Project's land acquisition process, Enerjisa Üretim conducts negotiation and information meetings with affected parcel owners prior to the initiation of expropriation procedures. In accordance with EMRA's standard sequence, the expropriation process is carried out in the order of Article 27, Article 8, and Article 10. The process follows: (i) initial meetings led by Enerjisa Üretim with parcel owners regarding land leasing arrangements, and (ii) a subsequent negotiation meeting conducted by EMRA as part of the formal expropriation process. If an agreement is reached between Enerjisa Üretim and the parcel owners, no expropriation is required.

2.3. ACCESS ROADS

Access roads to the turbine locations and associated infrastructure of the FALP Wind Power Plant Project will intersect a total of 6 land parcels, including:

- 1 treasury-owned parcels, to be used via easement rights,
- 3 forest land parcels, and
- 2 privately owned parcels; one of the parcels is subject to deed of consent, and the other one is subject to expropriation.

These impacts are primarily concentrated in the villages of Sarıkaya, Kırcağız, and Kargıcak, where road widening or re-alignment is required to ensure heavy equipment access.

Compensation for privately owned land will be determined based on full replacement cost, in accordance with Turkish Expropriation Law No. 2942 and IFC Performance Standard 5 (PS5) and EBRD ESR5.

Access to the Project site will be provided via existing rural roads connecting to the provincial road network in the vicinity of Kargıcak and Kırcağız, which are located southwest of the WPP area. During the construction phase, existing roads will be improved, and route deviations may be applied where necessary, including temporary bypasses for equipment transport.

In summary, the FALP Project's land footprint covers a range of land ownership types and usage patterns across multiple settlements in Muğla and Aydın provinces. While most turbine locations and temporary use areas are situated on forest lands requiring usufruct permits, the linear infrastructure—particularly access roads and the energy transmission line (ETL) intersects both treasury land and privately owned parcels. These components trigger different acquisition mechanisms, including easement rights and expropriation. As such, Project Affected Persons (PAPs) may face a combination of land loss, access restrictions, and disruption of economically significant land uses such as seasonal grazing, fuelwood collection, or agricultural cultivation. During the site visit in September 2025, based on the PAP interviews, some of the users might be affected by the ETL route due to the potential impact on Mediterranean stone pine. Therefore, compensation with regards to loss/damage or loss of income will consider the impacts on Mediterranean stone pine. As of October 2025, the ETL route for the Project has been finalized and additional asset and inventory surveys and land acquisition in line with EBRD ESR5 will be carried. Findings will be annexed and integrated into this LRP as relevant. Thus, a new field survey will be conducted on the ETL route to identify all land acquisition affected PAPs, including informal land users. The results of the survey will be reflected in an LRP Addendum once the fieldwork is completed and verified, in line with EBRD ESR5 requirements. The impacts will be analyzed in detail in the following chapters under the frameworks of economic displacement and livelihood restoration, in line with IFC PS5 and EBRD ESR5.

3. LEGAL AND REGULATORY FRAMEWORK OF THE LRP

The LRP for the FALP Wind Power Project is guided by the relevant Turkish legal framework governing land acquisition, compensation, and rights of Project Affected Persons (PAP), along with international standards such as IFC PS 5, EBRD ESR5. Key national legal instruments applicable to the Project are outlined below.

3.1. NATIONAL LEGISLATION

Understanding the legal and regulatory framework governing land acquisition is essential to accurately interpret the project's land requirements and the associated impacts on affected persons. This section outlines the key national laws and procedures applicable to land acquisition, compensation, and tenure arrangements in Türkiye. The sub chapters below describe relevant national laws applicable to this LRP.

3.1.1. EXPROPRIATION LAW (LAW NO. 2942)

The Expropriation Law regulates the procedures for the acquisition of immovable properties owned by private individuals or legal entities for projects serving the public interest. It outlines the legal requirements for calculating compensation, establishing easement rights, and transferring land ownership.

This law is the primary legal instrument governing land acquisition under the FALP WPP, including both permanent acquisition and temporary or limited-use rights for infrastructure such as wind turbines, transmission lines, and access roads.

It applies to privately owned lands, while the acquisition or use of treasury, forest, or pasture lands is governed by separate legislation, summarized in subsequent subsections.

Key Provisions Relevant to the Project:

- **Article 3 – Basis for Expropriation:** Public administrations may expropriate immovable properties, resources, and associated rights to implement infrastructure projects (e.g., energy facilities) in return for compensation paid in full and in cash.
- **Article 4 – Easement Rights:** Where land ownership is not altered, limited rights of use (easements) may be granted for infrastructure such as transmission lines or internal access roads. If property rights are not significantly impaired, expropriation may not be required.
- **Article 5 – Public Interest Decision:** A formal public interest decision must be issued by the authorized institution before land acquisition proceeds.
- **Articles 7–8 – Administrative Procedures:** Expropriating authorities must prepare detailed cadastral maps, conduct ownership inquiries, and initiate valuation and negotiation processes via designated commissions. If the agreement is reached with the landowner, a protocol is signed, and payment is made within 45 days.
- **Article 10 – Judicial Process:** If no agreement is reached, a civil court determines compensation and registers the land in the administration's name. The process includes expert valuation, hearings, and publication in local media. The process includes expert valuation, hearings, and publication in local media. Article 10

therefore provides a legal avenue not only for disputes over compensation but also for resolving objections linked to land division and residual plots, which is particularly relevant in the context of IFC PS5 and EBRD ESR5 requirements for ensuring fair and transparent land acquisition outcomes.

- **Article 11 – Valuation Principles:** Compensation excludes any increase in land value resulting from the project and considers any reduction in value due to easement.
- **Article 12 – Partial Expropriation:** If the remaining land becomes unviable (e.g., too small or inaccessible), the owner may apply for full acquisition within 30 days.
- **Article 14 – Right to Appeal:** Affected owners may challenge the expropriation decision in administrative courts within 30 days of notification.
- **Article 18–19 – Ownership Disputes & Unregistered Lands:** In case of disputed or unregistered land, courts determine compensation and rightful beneficiaries based on evidence. Informal users are not typically eligible under national law, but support will be provided under this LRP where required.
- **Article 25 – Transfer of Ownership:** Once the court decision is finalized, ownership transfers to the administration, and the owner can no longer use or modify the land. Any activities after this point are not compensated.
- **Article 27 – Urgent Expropriation:** In special circumstances (e.g., urgent public need), land may be acquired before full legal proceedings are completed, provided compensation is deposited in advance.
- **Article 30 – Transfer Between Public Institutions:** Immovable assets owned by public entities can be transferred to another institution following a formal valuation and application process, without typical expropriation proceedings.

3.1.2. ADDITIONAL APPLICABLE LEGISLATION

In addition to the above, the following laws are applicable:

- **Cadastral Law (No. 3402):** Defines parcel boundaries and legal ownership status.
- **Land Registry Code (Official Gazette No. 28738):** Regulates land title registration, amendments, and property rights.
- **Notification Law (No. 7201):** Establishes procedures for legally notifying landowners, including those with unknown addresses.
- **Forest Law (No. 6831):** Requires permits and environmental compensation for the use of forest lands in renewable energy projects.
- **Pasture Law (No. 4342):** Governs conversion of pasture land. While user rights are not fully recognized, compensation is typically paid to public agencies.
- **Agricultural Reform Law (No. 3083):** Addresses land consolidation in areas where agriculture is no longer viable.
- **Electricity Market Law (No. 6446):** Defines TEİAŞ's authorities and responsibilities for the construction of transmission facilities and the implementation of expropriation procedures.

- **Civil Code (No. 4721):** Sets out the fundamental rules on property rights, easements, and legal principles governing immovable assets.
- **Decree-Law No. 233 on State-Owned Enterprises:** Provides the general framework for the establishment, duties, and authorities of state economic enterprises, including TEİAŞ.
- **Articles of Association of TEİAŞ (29 June 2001):** Defines TEİAŞ's operational scope, organizational structure, and specific provisions regarding land acquisition.
- **Land Development and Planning Law, Cadastre Law, Forestry Law, Pastures Law, Organized Industrial Zones Law, etc.:** Regulate land use, cadastral boundaries, forest and pasture areas, and industrial zones, guiding TEİAŞ's route planning and expropriation processes.
- **Environment Law and Agricultural Reform Law (No. 3083) and other applicable legislation:** Establish environmental protection obligations and agricultural land regulations that influence land acquisition decisions for transmission projects.

3.1.3. LAND ACQUISITION PROCESS AS PER THE NATIONAL LAW

Land acquisition for the Project is carried out in accordance with the Turkish Expropriation Law No. 2942, as amended by Law No. 4650. The Law establishes the procedures for acquiring private land for investments that are deemed to serve the public interest, including renewable energy projects such as wind power plants. The national process consists of the following key steps:

1. Public Interest Decision

The relevant public authority (typically the Ministry of Energy and Natural Resources or the Provincial Administration) issues a Public Interest Decision (PID) confirming that the Project qualifies for public benefit and authorizing the start of expropriation procedures.

2. Identification of Affected Land and Ownership Verification

Following the PID, the administration identifies all affected parcels within the Project footprint (turbine locations, access roads, connection lines, and ancillary facilities). Land title information is obtained from the Land Registry and Cadastre Directorate to verify ownership, property boundaries, and legal encumbrances.

3. Valuation of Assets and Land

A Valuation Commission is established to determine compensation in line with Article 11 of the Expropriation Law. Valuation is based on:

- Current market value of comparable properties,
 - Land type, location, and usage,
 - Productivity (for agricultural plots),
 - Trees, crops, structures, and other immovable assets on the land.
- Independent valuation experts may be engaged where necessary.

According to national legislation, land valuation can technically be conducted using three methods:

- Market Value
- Transformation Price
- Complementary Value

Plot Valuation

In case of plot valuation for expropriation purposes, the law requires that valuation must be based on the market value criterions (Article 11 of Law No. 2942).

In practice, the market value of a plot is determined through direct comparison with similar plots with known real sales prices. This requires:

- identifying comparable parcels that are similar in technical characteristics, size, location, land use and market conditions,
- determining their actual transaction prices,
- calculating the average unit price per m².

Adjustments may be made based on topography, access, infrastructure availability, or parcel shape.

Valuation of Structures on Lands and Plots

If there are structures on the areas to be expropriated; the surface area, category and age of these structures are determined first. The unit prices of the structures announced by the Ministry of Environment, Urbanization and Climate Change every year, and for specially manufactured structures without a unit price, the unit price analyses are taken as basis and the construction costs at the time of expropriation are deducted. The depreciation shares determined according to the construction category and age specified in the amended article 23 of the Regulation on the Assessment of Tax Values to be Taken as a Base for Real Estate Tax, published in the Official Gazette dated 02.12.1982 and put into effect by the Decision of the Council of Ministers, are deducted from this construction value, and the expropriation value of the structure is found in accordance with the cost criterion. In addition, the lack or abundance of some elements of the structure reduces or increases the unit square meter values for structures in the same class. Even in structures with the same characteristics, the change in the quality of the material used changes the construction value. In this case, what needs to be done is to calculate the costs of the lacking or abundant elements in the structure whose inventory is prepared, and to deduct/add them from/to the construction value.

Under the land acquisition plan, compensation will be paid to cover the full replacement cost of structures (if any).

Wreckage Value

Should the owner keep the wreckage, the assessed value of the wreckage must be subtracted from the overall value. Additionally, costs related to demolition and transportation should be calculated and compensated to the owner.

Temporary Easement Fee

When the easement right is set for a duration of 2-10 years, denoted as (n) years, and is deemed temporary, the reduction in net income within the area of the easement over (n) years is calculated up to the point when the easement right is granted.

For a temporary easement right, the loss of value is not assessed as if a permanent easement were in effect for the entire property; rather, the incurred loss is evaluated based on the income or rent forfeited from that specific portion of the property during the easement period.

According to the rulings of the Supreme Court of Appeals, the value of a two-year easement right corresponds to the income generated over two years from the area where the easement is granted. The ruling specifies that if the area is leased, the relevant amount is the rental fee, and if it is farmed, it reflects the loss of anticipated crop yield.

Permanent Easement Fee

If the period for establishing the easement is extended, it is classified as an indefinite easement lasting between 49 to 99 years. The easement fee is identified as the difference in land value before and after the easement is established, essentially reflecting the reduction in land value.

Net income loss can be calculated by taking into account;

- (i) the income loss that will occur due to the decrease in net income (decrease in productivity or increase in expenses)
- (ii) change in capitalization interest rate

Loss of income due to decrease in net income:

The easement right is determined by calculating the difference between the net income prior to the establishment of the easement and the net income following its establishment, then dividing this difference by the capitalization interest rate. In determining the net income after the establishment of the easement, the reduction in productivity and changes in expenses are assessed based on the following factors:

- type of property,
- its use,
- its size,
- location of the area affected by the easement,
- its surface area,
- geometrical position.

In establishing parcel prices for long-term easement rights, the compensation fee must not surpass 35% of the value of the land impacted by the easement. For plot parcels, this limit is set at 50%. This percentage is the maximum amount established by the Supreme Court of Appeals in accordance with Turkish law. The ownership status of the land remains unchanged, and these restrictions are removed once the land use concludes.

Calculation of Tree Prices

Once the base land value for areas with fruit-bearing or non-fruit-bearing trees is established, the price of the trees is calculated using a specific formula that considers the age of each tree. In the assessment, after determining the value of a woodland that is t years old, the value of the trees can also be derived based on their age. This is achieved by dividing the difference between the value of a specific t-year-old fruit tree and a non-fruit-bearing tree by the number of trees per decare.

4. Negotiation and Amicable Settlement

The administration is legally required to first pursue amicable (negotiated) settlement. Landowners are notified and invited to negotiation meetings. If landowners accept the compensation offer, a voluntary purchase agreement is signed, and the payment is made directly to the owner.

5. Compulsory Expropriation (If Negotiations Fail)

If an amicable agreement cannot be reached, the administration initiates compulsory expropriation through the civil court. The court appoints experts to re-evaluate the property value and determines the final compensation amount. After payment is deposited in the court account, the land title is transferred to the state.

6. Urgent Expropriation (If Applicable)

In cases where the Project is considered urgent for public interest, the administration may apply Article 27 (Urgent Expropriation). This allows immediate possession of the land following a court decision, while valuation procedures continue in parallel.

7. Payment of Compensation

In all cases, compensation must be:

- Paid in full, in advance,
- Either directly to the landowner or deposited in court (for disputed cases).

No transfer of land title can occur prior to the completion of payment.

8. Registration and Transfer of Land

Once compensation is finalized, the land is officially registered in the name of the expropriating authority at the Land Registry. The administration obtains full access rights, and Project construction activities may begin in compliance with legal requirements.

3.1.4. LAND ACQUISITION APPROACH OF THE PROJECT

The Project will implement all land acquisition activities in full compliance with the applicable Turkish national legislation, including the Expropriation Law No. 2942 and related regulations. Wherever national legislation provides clear procedures and requirements, the Project will follow these processes as the primary legal framework. In situations where national law does not fully address key principles required under international standards particularly those outlined in EBRD ESR5 and IFC Performance

Standard 5, the Project will apply the relevant EBRD/IFC provisions to close the identified gaps presented in Section 3.3. Accordingly, all valuations conducted under the Project will be based on full replacement cost without deductions for depreciation, salvage value, or transaction costs. Compensation for trees, perennial crops and other productive assets will consider their age, productivity, and the cost of re-establishment, ensuring that PAPs can restore their livelihoods.

Asset valuation is conducted based on a scoring system developed by Enerjisa presented in Section 8 – Other Support Measures.

3.2. INTERNATIONAL APPLICABLE STANDARDS

The Project is designed to align not only with national legal requirements but also with internationally recognized environmental and social performance frameworks. These standards provide a comprehensive basis for managing land acquisition, economic displacement, and stakeholder engagement in line with global best practices. Key applicable standards are presented below.

IFC PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

IFC Performance Standard 5 (PS5) acknowledges that land acquisition and restrictions on land use associated with development projects may cause both physical displacement (relocation or loss of shelter) and economic displacement (loss of assets or access to resources that sustains livelihoods). Displacement is considered involuntary when affected persons do not have the legal right to refuse land acquisition or use restrictions.

Relevant scenarios under PS5 include:

- Compulsive acquisition through expropriation or administrative procedures.
- Negotiated settlements that involve the risk of compulsive measures if no agreement is reached.
- Restrictions on access to land, forest, or natural resources traditionally used by communities.
- Impacts on informal or vulnerable land users lacking legal titles or recognized tenure.

For such cases, PS5 requires:

- Compensation at full replacement cost for land and assets.
- Preparation of a Livelihood Restoration Plan (or Resettlement Action Plan).
- Special attention to vulnerable groups and culturally appropriate support measures.
- Documentation of all land-related transactions, compensation processes, and grievance mechanisms.

In the Project, there is no physical displacement, but economic displacement will occur due to loss of access to forest areas, agricultural land, or resource-based activities (e.g., grazing, wood collection). This LRP has been developed in accordance with PS5 to address such risks and ensure restoration of affected livelihoods.

IFC PERFORMANCE STANDARD 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS

PS1 provides the overarching framework for managing project-level environmental and social risks. It mandates:

- Integrated risk and impact assessment (e.g., ESIA),
- Stakeholder engagement and information disclosure, and
- Development of an Environmental and Social Management System (ESMS).

Under PS1, the FALP Project has developed a comprehensive ESIA and associated management plans, including this LRP, to ensure ongoing monitoring and mitigation of risks throughout the project lifecycle.

EBRD ENVIRONMENTAL AND SOCIAL REQUIREMENT 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT

EBRD's Environmental and Social Requirement 5 (ESR5) mirrors the key principles of the PS5 in aiming to avoid or minimize physical and economic displacement, while ensuring that affected persons are compensated and supported in restoring or improving their standard of living and livelihood.

ESR5 applies to:

- Involuntary land acquisition;
- Restrictions on access to legally or customarily used lands and resources;
- Displacement of both formal landowners and informal users;
- Both physical and economic displacement, regardless of tenure status.

Core principles include:

- Compensation for lost assets at full replacement cost;
- Provision of livelihood support programs;
- Transparent and consultative processes for identifying entitlements;
- Monitoring and evaluation of resettlement outcomes.

The Project has adopted ESR5 as a benchmark to ensure that land acquisition processes, including the granting of easements and loss of forest access, do not result in unmitigated adverse impacts on local land users, including those with customary or informal use.

While EBRD's ESR5 (2024) remains broadly aligned with IFC PS5 and EBRD's former PR5, the 2024 update introduces clarifications relevant to this Project. In particular, ESR5: (i) requires restoration of access and compensation for temporary land-use restrictions during construction; (ii) sets explicit safeguards for voluntary land donations; (iii) clarifies personal data protection and cut-off procedures for census/inventory and valuation updates; (iv) requires consideration of cumulative impacts when planning socio-economic surveys and livelihood measures; (v) mandates gender-responsive engagement and gender-disaggregated monitoring; and (vi) for private-sector projects with government-managed land acquisition/resettlement, strengthens the expectation for a clear plan/framework delineating roles and responsibilities, together with enhanced monitoring,

an execution report, and, where warranted, external reviews/audits. These refinements are adopted as the benchmark for the Project.

EBRD ENVIRONMENTAL AND SOCIAL REQUIREMENT 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

EBRD's Environmental and Social Requirement 1 (ESR1) provides the overarching framework for identifying, assessing, and managing environmental and social risks throughout the life of a project. It requires project sponsors to:

- Conduct a robust ESIA;
- Establish and maintain an Environmental and Social Management System (ESMS) appropriate to the nature and scale of the project;
- Identify both direct and indirect social impacts, including those related to land acquisition and economic displacement;
- Ensure that mitigation measures are incorporated into project design and implementation;
- Implement a process of ongoing stakeholder engagement aligned with the nature and scale of the project's risks.

Under ESR1, livelihood restoration and the avoidance or minimization of social harm must be integrated into the Project's risk management approach. The Project has adopted ESR1 as a guiding principle for environmental and social due diligence, including the preparation of the ESIA, this LRP, and the Stakeholder Engagement Plan (SEP).

EBRD ENVIRONMENTAL AND SOCIAL REQUIREMENT 10: STAKEHOLDER ENGAGEMENT

EBRD's Environmental and Social Requirement 10 (ESR10) sets out the requirements for meaningful engagement with affected communities and other stakeholders throughout the Project lifecycle. It emphasizes that stakeholder engagement is an ongoing and proactive process that must be culturally appropriate and inclusive of vulnerable groups.

Key obligations under ESR10 include:

- Early disclosure of relevant Project information in a language and format understandable to affected people;
- Implementation of a structured consultation process, including meaningful opportunities for input from stakeholders prior to land acquisition or displacement;
- Establishment of an accessible, transparent, and non-judicial grievance mechanism;
- Documentation of engagement activities and integration of feedback into Project planning and mitigation.

In alignment with ESR10, the Project has developed a Stakeholder Engagement Plan (SEP) and a Grievance Mechanism (GM) to ensure that land users, including those with informal or customary rights, are properly informed, consulted, and able to raise concerns. These tools are critical to supporting the transparent and inclusive implementation of the LRP and ensuring alignment with international good practice.

EQUATOR PRINCIPLES

The Equator Principles (EPs) are a risk management framework adopted by financial institutions to assess and manage environmental and social risks in project finance. The Project aligns with the EPs, particularly:

Principle 5: Stakeholder Engagement, which requires meaningful consultation, information disclosure, and culturally appropriate engagement, especially with vulnerable and affected communities.

Principle 6: Grievance Mechanism, which mandates the establishment of an accessible, transparent, and non-retaliatory system for receiving and addressing concerns.

3.3. GAP ASSESSMENT

The following table presents a comparative gap analysis between Turkish national legislation and the key requirements of EBRD ESR5. It highlights areas where Turkish law aligns with, partially addresses, or diverges from international standards, particularly concerning the treatment of informal land users, livelihood restoration, compensation valuation, stakeholder engagement, and grievance mechanisms.

While Turkish legislation provides a structured process for formal expropriation and compensation, it lacks key provisions required under international standards, especially with regard to non-title holders, vulnerable groups, transitional livelihood support, and participatory resettlement planning.

Gap analysis between Turkish national legislation and the key requirements of EBRD ESR5 on Land Acquisition, Involuntary Resettlement, and Economic Displacement is presented in Table 0-9.

TABLE 0-9 GAP ANALYSIS BETWEEN TURKISH NATIONAL LEGISLATION AND INTERNATIONAL STANDARDS

Gap Subject	EBRD ESR5	Turkish Legal Provision	Gap Identified	Measures to bridge the gap
Avoidance and Minimization	Avoid and minimize displacement through project design.	No provision; practice discourages resettlement.	Legal gap exists; practice aligns partially with ESR5. While Turkish legislation discourages resettlement in practice, it does not explicitly require avoidance and minimization of displacement through project design. There is no legal obligation for	No physical displacement is expected under the project. Project is using public lands as much as possible to avoid /minimise impact to private land users.

Gap Subject	EBRD ESR5	Turkish Legal Provision	Gap Identified	Measures to bridge the gap
			demonstrating that all feasible alternatives were assessed to avoid or reduce displacement.	
Census and Baseline Information	Conduct census and asset inventory including non-title holders;	Turkish Law requires preparation of an inventory of assets. Land acquisition through expropriation requires conducting a census (full census) of the affected immovable assets and preparing a complete list of their owners.	Major gap: Legal census omits informal users (squatters) and informal tenants.	ESR5 process and eligibility criteria will be implemented. An inventory of assets will be prepared by TEİAŞ with the support of Enerjisa. All land users (including informal users and disadvantaged/vulnerable individuals) will be determined through an Asset Inventory and Census in accordance with ESR5. In addition, household surveys will be conducted to analyze land acquisition impacts on PAPs.
Cut off date	The client will establish a cut-off date for eligibility, ⁶ adapted to the needs and legal framework of every project, usually either: (i) as foreseen in applicable legislation; or (ii) using the end date of the inventory or project delineation (whichever is the latest). The client will inform affected persons of the cut-off date. Information on the cut-off date	Expropriation compensation is provided to legal title holders in accordance with the Expropriation Law No. 2942. In order to prevent newcomers from settling in the expropriation area, the date when the notice of decision for public good is posted at the village headman's office is used as a cut-off date for large-scale investment projects.	Moderate gap: announcements may not be disclosed to everyone in line with ESR 5	The cut-off date is the date at which the "asset inventory observation" is conducted and the assets on the land are recorded. The cut-off date will be announced to the affected communities by TEİAŞ and Enerjisa's expropriation and community relation teams.

Gap Subject	EBRD ESR5	Turkish Legal Provision	Gap Identified	Measures to bridge the gap
	will be well documented and disseminated throughout the project area at regular intervals in written and non-written form in a manner that is culturally appropriate, gender responsive, understandable and readily accessible to affected persons. This will include posted warnings that persons settling in the project area after the cut-off date may be subject to removal. (Also see parag 29 of ESR 5 for additional provisions)	In order to prevent fraudulent claims, a digital cadastral and civil registry system based on individuals' current addresses is used.		
Scope of Eligibility	Compensate and support informal users/squatters of public lands	Only legal owners and formal users are eligible for compensation. Informal users are not recognized.	Major gap: Informal users of forest and pasture lands are not eligible for compensation under national law.	The Company will identify and compensate informal users as per ESR 5.
	Compensation/assistance to affected people who are not property owners is required under ESR 5 regardless of lack of title.	There is no legal provision requiring payment of compensation to tenants, sharecroppers and other users of the property who are not owners.	Major gap	The tenants of agricultural lands to be expropriated before harvest of crops will be eligible for compensation for crops. Sharecroppers and other users of the property will also be paid for their losses and damages, if their contract so stipulates. The availability of agricultural lands for rent in the vicinity of the land to be

Gap Subject	EBRD ESR5	Turkish Legal Provision	Gap Identified	Measures to bridge the gap
				expropriated will be searched. Particular attention will be paid to avoid any damage on the livelihoods of tenants.
Livelihood Restoration	Restore or improve livelihoods and living standards through structured support.	No provision for restoring livelihoods; compensation is limited to land and assets.	Major gap: No livelihood restoration requirement.	Company has developed this LRP to address livelihood losses of project affected people .
Compensation Standard	Compensation at full replacement cost including transaction fees, lost income, and transitional allowances.	Based on market value; depreciation may apply; symbolic compensation for public land.	Moderate gap: Falls below international standard mainly in case of buildings. However valuation of lands/trees /crops done by independent valuers of the company and or Court assigned third party experts expected to meet the market rates	Align compensation with replacement cost standards.
Resettlement Planning	Prepare Resettlement Action Plan (RAP) or Livelihood Restoration Plan (LRP) regardless of physical displacement.	No legal obligation for private sector to prepare RAP or LRP.	Significant gap: No private-sector obligation.	Development of this LRP.
Full Replacement Value and Compensation	Compensation at full replacement cost, regardless of legal title.	The valuation of lands is undertaken by independent qualified valuator then assessed by the valuation commission, taking into account the alternation system, regional advantages and	Moderate to major gap for buildings and informal users.	No buildings affected so this will not be a major issue for this project. Land prices are assessed by qualified independent valuers and those acquired through courts are assessed by the court assigned third party experts

Gap Subject	EBRD ESR5	Turkish Legal Provision	Gap Identified	Measures to bridge the gap
		some specific factors of the land to be expropriated. Structure compensation may deduct depreciation; public land users are excluded.		The project will ensure full replacement cost is paid for project affected lands/trees and crops.
Loss of Business	Compensate lost income and re-establishment costs for affected businesses.	No provision for loss of income or business reestablishment.	Major gap: No provision for loss of business.	Baseline surveys proved no businesses are going to be affected however in case this happens, the project will compensate the losses in alignment with the ESR 5 requirements
Compensation for Communal Assets	Provide access alternatives or collective compensation for loss of access to communal resources.	No compensation to individuals for forest/pasture use; rights belong to state institutions.	Major gap: Collective users not recognized.	Recognize and compensate communal use.
Measures for Vulnerable Persons	Identify and support vulnerable groups (e.g., poor, elderly, women, disabled) in livelihood restoration.	No definition or strategy for vulnerable persons in expropriation processes.	Major gap: Vulnerability is not addressed.	Company will identify and prioritize support for vulnerable groups.
Monitoring and Evaluation (M&E)	Monitor implementation and effectiveness of livelihood restoration; take corrective actions.	No obligation to monitor post-expropriation outcomes.	Moderate gap: No monitoring requirements under law.	Project will establish M&E systems for livelihood outcomes in close coordination with the relevant state authorities and PAPs
Information Disclosure	Early and ongoing disclosure of risks, impacts, and mitigation in accessible language/formats.	Limited to EIA process notifications; does not include land acquisition, LRP or economic/social impact disclosures.	Major gap: Disclosure limited to environmental aspects.	Enerjisa will support the land acquisition process managed through EPDK. They will engage regular meetings with PAPs during implementation of LRP.

Gap Subject	EBRD ESR5	Turkish Legal Provision	Gap Identified	Measures to bridge the gap
				<p>ETLs: Local expropriation teams of TEİAŞ regional directorates will organize information meetings with landowners when sub-project details and expropriation procedures are finalized. Enerjisa teams will support this process.</p> <p>In addition, where Article 27 implementation will be undertaken, preliminary information and negotiation meetings will be held with landowners by TEİAŞ regional directorates and only after all measures fail urgent expropriation will be applied in the case of ETL.</p>
Project-Level Grievance Mechanism (GM)	Establish accessible, transparent, and non-retaliatory grievance mechanism for affected persons throughout the project lifecycle.	No requirement for project-level GM; formal judicial appeals are the only remedy.	Major gap: Absence of non-judicial, project-level grievance mechanism.	<p>The Grievance Redress Mechanism is established within the scope of the Project to ensure that the problems of PAPs are resolved quickly, fairly and transparently without having to take legal action. The functioning of the mechanism is presented in detail in Section 11.3 and the SEP. In case the solutions within the scope of the GRM fail, PAPs can seek legal remedy.</p>

To address the defined gaps and ensure compliance with international best practices, the Project has developed this LRP. Measures adopted to close the identified gaps include:

- Extending eligibility to informal and customary land users identified through field-based census activities;
- Ensuring compensation at full replacement cost, including for structures and natural resource access losses not covered by national law;
- Providing transitional livelihood support and targeted assistance to vulnerable groups;
- Implementing project-specific grievance mechanisms and robust monitoring systems;
- Enhancing stakeholder engagement beyond EIA requirements through the Stakeholder Engagement Plan (SEP); and
- Documenting all mitigation and restoration actions in line with IFC PS5 and EBRD ESR5.

Building on this approach, the LRP has been developed not only to fill the identified regulatory gaps but also to safeguard the rights and livelihoods of all PAPs in line with international standards.

4. INFORMATION SOURCES AND METHODOLOGY

This section outlines the methodology followed during the data collection process for the Livelihood Restoration Plan (LRP) for the FALP Wind Power Project (WPP). Data were collected as part of the broader Environmental and Social Impact Assessment (ESIA) study and supplemented through additional field research.

4.1. DATA COLLECTION PROCESS OF THE FIELD STUDY

This chapter presents the information collected in March 2025 fieldwork. A new field survey will be conducted for the ETL to identify all land acquisition affected PAPs, including informal land users. The socioeconomic data and the full list of affected parties identified through this survey will be incorporated into the updated LRP. As the survey results are not yet available, they will be reflected in an LRP Addendum once the fieldwork is completed and verified, in line with EBRD ESR5 requirements.

The LRP field data collection was aligned with the IFC Performance Standard 5 (PS5) and EBRD Environmental and Social Requirement 5 (ESR5), with the aim of identifying project-affected persons (PAPs), understanding potential economic displacement, and developing mitigation strategies.

The LRP data collection process was executed in two primary phases:

- Initial Field Study (July 2024)
- Supplementary Field Study (March 2025)

All research tools and strategies were developed to ensure inclusion, gender sensitivity, and data integrity.

4.1.1. DESKTOP STUDIES

Prior to field deployment, the following preparatory activities were undertaken:

- Design of survey instruments:
 - Household Survey Form
 - Mukhtar Interview Form
 - Women's Livelihood and Forest Use Form
- Training field researchers on ethics, confidentiality, and gender-sensitive interviewing
- Mapping of settlement boundaries and updated land acquisition lists
- Coordination with mukhtars and local authorities

Target settlements were identified based on the updated project footprint, including the wind turbine areas, access roads, energy transmission line (ETL), and temporary land use areas. Selection was based on proximity to affected parcels, forest and pastureland use, and likelihood of encountering economic displacement.

INITIAL FIELD STUDY (JULY 2024)

The first round of field studies was carried out between 11–17 July 2024 by a six-person field research team in the following directly affected neighbourhoods:

- Sakarkaya
- Kayabükü
- Çukur
- Konak
- Narhisar
- İkiztaş

Household interviews were conducted in common village areas to maximize participation. Interviews with mukhtars were used to gather data on demographics, livelihoods, infrastructure, vulnerability, land ownership, and resource use. A breakdown of surveys is given in Table 0-10.

TABLE 0-10 LRP SURVEYS TARGETED AND COMPLETED (JULY 2024)

Province	District	Settlement	Planned	Completed	Mukhtar Survey
Muğla	Milas	Sakarkaya	25	25	1
Muğla	Milas	Kayabükü	8	6	1
Muğla	Milas	Çukur	14	14	1
Muğla	Milas	Konak	7	9	1
Muğla	Milas	Narhisar	6	10	1
Muğla	Milas	İkiztaş	15	15	1

SUPPLEMENTARY FIELD STUDY (MARCH 2025)

A second field study was carried out between 20–23 March 2025, targeting settlements newly impacted by revised access road alignments and the ETL corridor. The objective was to reassess potential displacement risks and understand land use in the updated footprint. Village-level assessments were carried out in:

- Gökyaka
- Saraçlar
- Ektirli
- Ulukonak
- Gölcük
- Umcular
- Cumalar
- Abak
- Şenköy
- Kırcağız
- Kargıcak
- Sarıkaya
- Çukurköy (revisited)

Data collection methods included community-level interviews (See Table 0-11) with mukhtars, field observations, and targeted interviews with forest users, livestock herders, and beekeepers.

TABLE 0-11 SUPPLEMENTARY INTERVIEWS COMPLETED (MARCH 2025)

Category	Targeted	Completed
Mukhtar Interviews	13	11
Women's Group Interviews	-	2
Forest Users / Beekeepers	-	5
RAP/LRP Household Surveys	0	0

In Çukurköy, additional ESIA interviews were conducted in March 2025 to assess the cumulative impacts of multiple project components including wind turbine locations, the construction camp site, and the Energy Transmission Line (ETL) on the local community. These interviews were prompted by the anticipated influx of approximately 200 construction workers during peak construction, which could temporarily affect nearly half of Çukurköy's current population.

Although household-level LRP-specific surveys were not conducted at this stage due to the ongoing finalization of the expropriation parcel list, the March 2025 fieldwork included qualitative assessments of land use patterns, livelihood dependencies (e.g., forest use, agriculture), and potential access restrictions that may result in economic displacement.

These findings contributed to the understanding of likely project impacts and informed the design of livelihood restoration strategies under this LRP.

The Project team will carry out dedicated LRP household surveys once the final list of affected parcels and users is available, ensuring all affected persons regardless of tenure status are identified and supported. All field data gathered to date have been consolidated to shape the Project's mitigation measures and ensure alignment with the requirements of IFC PS5 and EBRD ESR5.

LIMITATIONS

Despite rigorous planning and the application of international good practice standards during the July 2024 and March 2025 field studies, several limitations affected the scope, representativeness, and depth of the data collected for the ESIA and RAP/LRP components of the FALP WPP Project:

Limited Awareness Among PAPs: During both fieldwork phases, the majority of Project Affected Persons (PAPs) had limited knowledge about the Project's objectives, scale, and potential impacts. This situation influenced their willingness to participate in interviews and, in some cases, led to incomplete or prematurely terminated survey responses.

Unfinalized Land Acquisition Lists: During the supplementary fieldwork conducted in March 2025, alignment and parcel information for the Energy Transmission Line (ETL) and other project infrastructure were still under revision. This situation, particularly in forested areas, prevented the identification of all landowners and users and restricted the ability to conduct targeted LRP household or user surveys. As a result, LRP-specific socioeconomic data collection could not be completed as a full census and was instead supplemented through household and mukhtar interviews based on the available data.

As of October 2025, the ETL route for the Project has been finalized. A new field survey will be conducted for the ETL and the access road to identify all land acquisition-affected PAPs, including informal land users. The socioeconomic data and the full list of affected parties identified through this survey will be incorporated into the updated LRP. As the survey results are not yet available, they will be reflected in an LRP Addendum once the fieldwork is completed and verified, in line with IFC PS5 and EBRD ESR5 requirements.

Low Female Participation and Institutional Constraints: Female participation in survey activities remained limited due to various factors, including traditional gender roles, the dominance of male-only gathering spaces (such as coffeehouses), and the limited support of some mukhtars for including women at the household level. Despite these barriers, additional efforts were made to reach women wherever possible.

Concerns About Environmental and Livelihood Impacts: Concerns about the Project's potential environmental impacts—particularly regarding forest degradation, loss of pastures, and biodiversity—were widespread, especially in settlements previously affected by forest fires. Communities dependent on forest-based livelihoods such as beekeeping, small-scale livestock husbandry, and olive cultivation expressed fears that the Project could further diminish their already fragile income sources. These concerns often led to cautious, skeptical, or guarded responses to survey questions.

High Rates of Non-Response and Neutral Attitudes: In certain settlements—particularly where the Project’s footprint had not yet been finalized or construction impacts remained hypothetical—respondents stated that they had no clear opinion about the Project. This led to a higher rate of unanswered questions and limited qualitative data, particularly regarding perceptions, coping strategies, and expectations.

Access Challenges in Remote or Forested Areas: Physical access to remote and forested areas—such as energy transmission line corridors or turbine sites—was limited. This prevented the research team from reaching all resource users, especially informal users and seasonal residents. Despite these constraints, five forest-dependent individuals (three herders and two beekeepers) were successfully interviewed to collect indicative data on seasonal land use patterns and economic dependence on natural resources.

Despite these challenges, the research team maintained a flexible and iterative engagement strategy with the support of community leaders and Project representatives. Most initially hesitant stakeholders eventually agreed to participate, albeit sometimes in abbreviated formats. All data collected has been integrated into this version of the LRP and will be supplemented by further targeted studies following the finalization of land acquisition and affected persons lists.

5. AFFECTED HOUSEHOLDS, LANDS, AND LIVELIHOODS: BASELINE AND IMPACT ANALYSIS

The sub chapters below present the socio-economic environment of PAPs affected by land acquisition and livelihood impacts.

5.1. DEMOGRAPHIC STRUCTURE OF THE PROJECT AOI

The largest settlement in the FALP WPP AoI area is Çukur Neighborhood, while the smallest is Konak Neighborhood. According to 2023 TURKSTAT ADNKS data¹, population information is given in Table 0-12.

TABLE 0-12 POPULATION IN PROJECT AFFECTED SETTLEMENTS

Settlement	Total Population	Male Population	Female Population
Çukur	480	105	82
Konak	187	105	82
Narhisar	289	153	136

Source: TurkStat ADNKS, 2024

When official population data and field data obtained from Mukhtar interviews were evaluated, it was observed that there was no significant population change in the settlements within the FALP WPP AoI in the last 10 years. When examining the age distribution of the local population within the AoI, it is observed that the 65+ age group ranks first.. This is followed by the 45-54 age group and the 55-64 age group occupying third place..

The data indicates a relatively low proportion of the dynamic population in the affected region. These findings suggest that the dynamic population is migrating away from the region, leaving a higher concentration of middle-aged and older individuals, as well as children.

Table 0-13 presents baseline demographic data for twelve villages that are expected to be affected by the FALP WPP's energy transmission line (ETL) and access road components. The total population across these settlements is 5,245, with a nearly even gender distribution approximately 50.7% male (2,536 individuals) and 49.3% female (2,709 individuals). Kırcağız, with 1,535 residents, is by far the most populous village, indicating a potentially higher exposure to land acquisition and access-related impacts.

TABLE 0-13 POPULATION STRUCTURE OF THE ETL AND IMPACTED SETTLEMENTS BY ACCESS ROADS

Settlement	Component	Total Population	Male Population	Female Population
Gökyaka	Energy transmission line	250	130	120
Saraçlar	Energy transmission line	430	186	244
Ektirli	Energy transmission line	341	164	177
Ulukonak	Energy transmission line	567	271	296

¹ <https://data.tuik.gov.tr/Kategori/GetKategori?p=nufus-ve-demografi-109&dil=1>

Settlement	Component	Total Population	Male Population	Female Population
Gölcük	Energy transmission line	598	293	305
Umcular	Energy transmission line	290	144	146
Cumalar	Energy transmission line	154	72	82
Abak	Energy transmission line	439	225	214
Şenköy	Energy transmission line	168	77	91
Sarıkaya	Access road	274	132	142
Kırcağız	Access road	1,535	770	765
Kargıcak	Access road	199	102	97

Source: Turkstad 2024

For a comprehensive overview of population structure, education levels, age distribution, and household characteristics in the AoI, please refer to the relevant chapters of the ESIA Report.

5.2. ECONOMY AND EMPLOYMENT

When Muğla province is analyzed economically, it is seen that the province's economy is generally fed by the tourism sector. Despite the effective weight of the tourism sector on the province's economy, the agricultural sector also makes serious contributions to the provincial economy with its production and export values. Tomatoes, pomegranates, citrus products, almonds, olive oil, eggplant, squash, Mediterranean stone pine, and cucumber are important agricultural products that provide significant income. Muğla, which has an important place in greenhouse vegetable cultivation, especially table tomato production, ranks 4th in Türkiye in terms of greenhouse area size of nearly 40 thousand decares.

Forest fires that affected many districts of Muğla Province in 2021 significantly reduced Muğla's honey production and caused great damage to the regional economy. Agricultural and livestock production within Project AoI were also affected by this situation.

According to the general ranking of Türkiye, Muğla was the first province in pine honey production before 2021 and, met 85% of the world's pine honey production and 90% of Türkiye's pine honey production; After the forest fires, many households and businesses had to abandon beekeeping activities. Some of those who did not abandon it turned to migratory beekeeping, while others turned to small-scale production.

Muğla has rich mineral deposits. The most important of these are the Yatağan lignite coal and Fethiye chrome deposits. In addition, Muğla is an important marble center.

The important districts of Muğla in terms of agricultural area size are Milas, Seydikemer, Menteşe and Yatağan, respectively. Milas and Seydikemer districts alone constitute 53% of the total agricultural area of Muğla. In parallel with these data, agriculture and animal husbandry constitute the main sources of income within Project AoI.

According to the 2023 TurkStat data, Muğla province ranks third in Türkiye in terms of net migration, following Antalya and Ankara. The province's natural features and tourism opportunities are among the key pull factors attracting migration to the region.

All settlements within the area of influence of the Project rely on a rural economy. The primary economic activities are agriculture and animal husbandry and one of the primary sources of income is pension. Additional income sources include business and freelance income, salaried work, beekeeping, and social supports.

Despite the rugged terrain, natural boundaries formed by forested areas, limitations in machinery usage, and water-related challenges, agriculture remains the primary economic activity in the neighborhoods within the Falp Wind Power Plant (WPP) area. Olive cultivation, in particular, stands out as the most prevalent agricultural activity. Konak village is the most reliant on olive production among the villages within the Project AoI. In addition to olive production, Mediterranean stone pine nut production is also carried out in the higher, forest-adjacent areas of the project site. Due to the high unit prices of Mediterranean stone pine nuts, this activity holds significant commercial importance for the local population.

Furthermore, chestnut cultivation, particularly around Narhisar and its vicinity, constitutes another notable commercial agricultural activity in the region. Other crops, such as barley and wheat, are primarily grown not for their commercial value but to meet the fodder needs of livestock or for household consumption. Similarly, gardening activities are predominantly focused on subsistence farming.

In the Falp WPP AoI area, livestock farming is predominantly carried out for milk production. Free-range livestock farming is practiced on a limited scale, primarily concentrated in Çukurköy. Small ruminant farming is at a subsistence level, and goat farming—once a significant activity in the region—is gradually declining.

Beekeeping activities in the region are conducted with approximately 40,000 hives. The highest hive densities are observed in Çukurköy neighborhood. It is estimated that within the settlements included in the Falp WPP project, beekeeping involves 80,000 to 100,000 hives as part of migratory beekeeping practices, with a significant portion of this activity concentrated in Çukurköy and Sakarkaya. These migratory beekeepers reportedly travel to provinces such as Konya, Çanakkale, and Tekirdağ. Beekeeping activities continue in the FALP project area. As in the wider Milas region, many beekeepers move their hives seasonally to various locations. During spring and early summer, the number of hives increases around forested areas, along forest roads, and near village boundaries. Beekeeping is practiced alongside livestock breeding and remains an active livelihood activity, particularly among the elderly population, since it is relatively easy to perform and the area is highly suitable for apiculture.

The data presented here are based on statements from local mukhtars. Because many migratory beekeepers are not officially registered, determining the exact number of hives and beekeepers is difficult. Nonetheless, beekeeping has been identified as the primary source of livelihood for approximately 4.8% of households within the FALP Area of Influence (AoI) villages. This figure indicates that while beekeeping is a main source of income for about 5% of households, it also serves as a secondary or subsistence activity for many others in the region.

Despite a continuous decline, Muğla remains the leading province in Türkiye for beekeeping activities. The observed decrease in beekeeping is attributed to various factors, including environmental impacts (such as sudden temperature changes and agricultural pesticides), the reluctance of younger generations to engage in activities like beekeeping, livestock farming, and agriculture, as well as high production costs. Discussions with locals reveal that young people prefer jobs with social security (SGK) benefits and view beekeeping and similar activities as physically demanding and incompatible with their career aspirations. Consequently, they tend to favor sectors like services, commercial ventures, or entrepreneurship.

Beekeeping production is predominantly sustained by middle-aged and older populations, who continue to bear the burden of maintaining these traditional activities. In the settlements within the Falp WPP AoI, non-agricultural and non-livestock economic activities are primarily centered around nearby mining facilities, feed factories, employment in the service sector, small-scale tradespeople, drivers, and individuals working in the tourism industry. Beekeeping activities continue in the Falp Project area. As in the wider Milas region, many beekeepers move their hives seasonally to various locations. During spring and early summer, the number of hives increases around forested areas, along forest roads, and near village boundaries. Beekeeping is practiced alongside livestock breeding and remains an active livelihood activity, particularly among the elderly population, since it is relatively easy to perform and the area is highly suitable for apiculture.

The data presented here are based on statements from local mukhtars. Because many migratory beekeepers are not officially registered, determining the exact number of hives and beekeepers is difficult. Nonetheless, beekeeping has been identified as the primary source of livelihood for approximately 4.8% of households within the FALP Area of Influence (AoI) villages. This figure indicates that while beekeeping is a main source of income for about 5% of households, it also serves as a secondary or subsistence activity for many others in the region.

When evaluating primary, secondary and tertiary livelihood sources, it is observed that households cited agricultural activities, pensions, and animal husbandry as their primary responses. Based on field data, 42.9% of respondents identified agriculture as their primary source of income, followed by pensions at 19%. For secondary livelihood sources, agriculture (23.8%), animal husbandry (20.2%), and pensions (13.1%) were the most frequently mentioned, while 31% of respondents reported having no secondary income.

Animal husbandry and pensions emerged as the predominant tertiary livelihood sources. Pensions hold significant importance across all three levels of livelihood, while the data indicates a decline in animal husbandry within the region.

TABLE 0-14 SOURCES OF INCOME IN THE FALP AOI

Sources of income	Main livelihood source of the household (%)	Second livelihood source of the household (%)	Third livelihood source of the household (%)
Agriculture (plant production)	42.9	23.8	3.6

Sources of income	Main livelihood source of the household (%)	Second livelihood source of the household (%)	Third livelihood source of the household (%)
Animal husbandry (animal production)	10.7	20.2	8.3
Pension	19.0	13.1	7.1
Beekeeping	4.8	1.2	3.6
Blue-collar paid, salaried work in a factory etc.	4.8	3.6	0
Desk/office white-collar paid, salaried work	3.6	2.4	0
Business and freelance income (Small tradesmen -grocer, greengrocer, butcher, haberdashery etc.)	6.0	0	0
Temporary seasonal agricultural/construction work	1.2	2.4	0
Social support provided by institutions (disability pension, widow's and orphan's pension, municipality, district governor's aid, etc.)	2.4	1.2	0
Temporary seasonal tourism work	1.21	0	2.4
No secondary/tertiary income	3.6	31.0	71.4
Total	100.0	100.0	100.0

Source: Muğla YEKA ESIA Field Study Findings, July 2024

Annual income expenses of the households: When examining the annual expense categories of households, it is evident that expenditures on basic needs dominate. The primary expense category is market and food expenses, accounting for a significant 33.3%. In the second expense category, market and food expenses again lead with 40.5%, followed by utility bills and agricultural expenses. In the third expense category, utility bills rank first at 20.3%, followed by market and food expenses at 14.3%.

TABLE 0-15 ANNUAL INCOME EXPENSE CATEGORIES

What are the expense categories of your annual income?	First	Second	Third
Market and food expenses	33.3	40.5	14.3
Transportation/travel costs (to school, workplace, etc.)	2.4	-	6.0

What are the expense categories of your annual income?	First	Second	Third
Agricultural expenses (fuel, fertilizer, feed, etc.)	41.7	14.3	4.8
Livestock expenses (feed, veterinary services, etc.)	8.3	13.1	3.6
Investments in agriculture, trade, or industry	6.0	2.4	-
Utility bills (water, electricity, etc.)	6.0	19.0	20.3
Rent	-		1.2
Health and personal care expenses	-	10.7	9.5
Paying off debt	1.2	-	-
Education expenses	1.2	-	4.8
No response			36.9
Total	100.0	100.0	100.0

Source: Muğla YEKA ESIA Field Study Findings, July 2024

AGRICULTURAL AND HUSBANDRY ACTIVITIES

Agriculture and animal husbandry stand out as key livelihood activities in the Project-affected settlements. According to the survey data, 42.9% of respondents identified agriculture as their primary source of income, while 20.2% cited animal husbandry as either a primary or secondary livelihood activity. Pension income (19% as primary; 13.1% as secondary) was also commonly reported, especially among older household members. Notably, 31% of respondents stated that they had no secondary source of income, underscoring the reliance of many households on a single livelihood stream—often agriculture or livestock. These findings highlight the continued importance of land-based and subsistence activities in the local economy.

According to the data, 73.8% of households reported that they continue agricultural activities. In the subsequent questions, these households were asked about the effects of the Project on their agricultural practices.

TABLE 0-16 ENGAGE IN AGRICULTURAL ACTIVITIES

Are you a farmer or do you engage in agricultural activities?	Number of Respondents	Percent
Yes	62	73.8

Are you a farmer or do you engage in agricultural activities?	Number of Respondents	Percent
No	22	26.2
Total	84	100.0

Muğla YEKA HHL Survey, March 2025

A weighted rate of 20.3% of PAPs interviewed within the scope of the field study think that the Project will have a negative impact on agricultural activities.

Another noteworthy data is that a significant proportion of 54.7% of the interviewed PAPs have no idea about the impacts of the Project. This is related to the current location of the Project and the lack of sufficient information about the Project activities.

TABLE 0-17 PERCEPTIONS OF PROJECT IMPACT ON AGRICULTURAL ACTIVITIES DUE TO THE PROJECT

Do you think you will lose income from your agricultural activities due to the project?	Number of Respondents	Percent
Yes	17	20.3
No	21	25.0
Don't know	46	54.7
Total	84	100.0

Source: Muğla YEKA ESIA Field Study Findings, July 2024

Another question asked to PAPs is what kind of impact they will experience in terms of income loss.

It is noteworthy that 79.8% of the PAPs stated that they have no knowledge of the potential impacts of the project. This lack of awareness is attributed to insufficient information provided about the project's activities, location, and land acquisition process. The most significant concern, cited by 13.0% of respondents, is the potential decrease in land productivity and crop quality, particularly olive oil, due to dust. Another concern raised is the potential damage caused by climatic conditions resulting from the project.

TABLE 0-18 INCOME LOSS OPINIONS OF THE PAPs

What kind of an impact will you experience income loss?	Number of Respondents	Percent
No idea	67	79.8
Due to the dust generated, olive groves and other crops will be damaged	11	13.0

What kind of an impact will you experience income loss?	Number of Respondents	Percent
Our water resources can be polluted, there may be air pollution	1	1.2
Our products will be damaged as climatic conditions will change	5	6.0
Total	84	100.0

Source: Muğla YEKA ESIA Field Study Findings, July 2024

There are 2 individuals (2.4%) using treasury and state lands for agricultural purposes. The proportion of those who do not use such lands is 97.6%.

TABLE 0-19 USE OF PUBLIC LAND FOR AGRICULTURE

Is there and public (state, treasury) land that use for agricultural purpose?	Number of Respondents	Percent
Yes	2	2.4
No	82	97.6
Total	84	100.0

Source: Muğla YEKA Field Study Findings, July 2024

Of the 2 individuals using treasury or state lands for agricultural purposes, one stated that there are olive or fruit trees on the land they use, while the other responded "no".

TABLE 0-20 TREES ON PUBLIC LAND

Are there any olive or fruit trees on the land you use?	Number of Respondents	Percent
Not engaged	82	97.6
Yes	1	1.2
No	1	1.2
Total	84	100.0

Source: Muğla YEKA Field Study Findings, July 2024

In the overall Falp WPP AoI, livestock farming is predominantly carried out for milk production. In the field research, the household representatives and mukhtars interviewed stated A common practice in the region involves animal owners grazing their livestock on privately owned lands and feeding them in shelters. Free-range livestock farming is limited in the area, with most of it concentrated in Çukurköy. Small ruminant farming, based on numbers, appears to be at a subsistence level.

The rate of households engaged in animal husbandry was found to be 53.6% according to the field study data. These households were asked about the expected Project impacts on animal husbandry activities.

TABLE 0-21 ENGAGEMENT IN ANIMAL HUSBANDRY

Do you engage in animal husbandry?	Number Respondents	Percent
Yes	45	53.6
No	39	46.4
Total	84	100.0

Source: Muğla YEKA Field Study Findings, July 2024

When examining the distribution of cattle ownership among households, it is observed that only 28 households own cattle.

TABLE 0-22 NO. OF CATTLE OWNED

How many cattle do you own?	Number of Respondents	Percent
1	2	2.5
2	2	2.4
3	2	2.4
4	4	4.8
5	8	9.5
6	1	1.2
7	2	2.4
8	1	1.2
10	3	3.6
20	1	1.2
30	1	1.2
100	1	11.2

How many cattle do you own?	Number of Respondents	Percent
0	56	66.7
Total	84	100.0

Source: Muğla YEKA Field Study Findings, July 2024

According to the household survey, only 18 households own small cattle. The average number of small cattle per household is 2.5. However, among those who own small cattle, the average number rises to 15.5. The decline in goat farming, which has traditionally been widespread in the region, emerges as a noticeable trend in these figures.

TABLE 0-23 NO. OF SMALL CATTLE OWNED

How many small cattle do you own?	Number of Respondents	Percent
1	1	1.2
2	3	3.6
4	1	1.2
5	5	6.0
7	1	1.2
10	4	4.8
15	1	1.2
50	1	1.2
60	1	1.2
0	66	78.6
Total	84	100.0

Source: Muğla YEKA Field Study Findings, July 2024

According to household data, the number of poultry owned by households is shown in the table below. A total of 24 households reported owning poultry. Households own 10 or 20 poultry.

The low number of poultry owned suggests that these animals are primarily kept to meet self-sufficiency needs.

TABLE 0-24 NO. OF POULTRY OWNED

How many poultry do you own?	Number of Respondents	Percent
2	2	2.4
5	3	3.6
6	1	1.2
10	9	10.7
13	1	1.2
15	1	1.2
20	6	7.1
25	1	1.2
0	60	71.4
Total	84	100.0

Source: Muğla YEKA Field Study Findings, July 2024

In the household survey, PAPs were asked how many months they had to buy feed for their animal husbandry activities. It was seen that 36.9% of the 31 participants engaged in animal husbandry answered "12 months". The total rate of those who did not buy feed at all and those who bought feed for 1-8 months was 4.8%.

TABLE 0-25 DURATION OF FEED PURCHASES FOR LIVESTOCK ACTIVITIES

How many months do you have to buy feed for your livestock activity?	Number of Respondents	Percent
Not engaged	45	53.6
0 months	4	4.8
1 months	1	1.2

How many months do you have to buy feed for your livestock activity?	Number of Respondents	Percent
5 months	1	1.2
6 months	1	1.2
8 months	1	1.2
12 months	31	36.9
Total	84	100

Source: Muğla YEKA Field Study Findings, July 2024

The responses provided by PAPs to the question of where their animals are fed are as follows: Out of 44 individuals engaged in livestock farming, 24 feed their animals on their own land, which corresponds to 28.6% of all PAPs. This response is followed by "on the village pasture" and "both on my own land and on the village pasture" in terms of frequency.

TABLE 0-26 WHERE ANIMALS ARE FED

Where do you feed your animals?				
Livestock Farming	In village pasture and public lands		On my own land	
	Number of Respondents	Percent	Number of Respondents	Percent
No	32	38.1	17	20.2
Yes	12	14.3	24	28.6
Not engaged	40	47.6	40	47.6
Total	84	100.0	84	100.0

Source: Muğla YEKA Field Study Findings, July 2024

Pasture usage among PAPs is observed at a level of 16.7%. Those who do not use pastures constitute 34%. Among those engaged in, the proportion of PAP who use pastures is 32.1%.

TABLE 0-27 USE OF PASTURES FOR GRAZING

Do you use pastures for grazing livestock?	Number of Respondents	Percent
Not engaged	43	51.2
Yes	14	16.7

Do you use pastures for grazing livestock?	Number of Respondents	Percent
No	27	32.1
Total	84	100.0

Source: Muğla YEKA Field Study Findings, July 2024

Among the local population using pastures, the number of those who think the pastures will be affected by the project exceeds the number of those who believe they will not be affected

TABLE 0-28 PERCEPTIONS OF PROJECT IMPACT ON PASTURES

Do you think the pastures you use may be affected by the Project?	Number of Respondents	Percent
Not engaged	72	85.7
Yes	7	8.3
No	5	6.0
Total	84	100.0

Source: Muğla YEKA Field Study Findings, July 2024

The question, "Has the land you own or use been affected by another project before?" was posed to all PAPs. The responses overwhelmingly concentrated on "No," with 86.9%.

TABLE 0-29 PRIOR PROJECT IMPACT ON OWNED OR USED LAND

Has the land you own or use been affected by another project before?	Number of Respondents	Percent
Yes	11	13.1
No	73	86.9
Total	84	100.0

Source: Muğla YEKA Field Study Findings, July 2024

FORESTRY AND BEEKEEPING ACTIVITIES

Despite the continuous decline, Muğla province remains a leader in Türkiye's beekeeping activities. According to the results of the household field survey conducted with the local population living in the Falp AoI, 21.4% of respondents are engaged in beekeeping.

TABLE 0-30 ENGAGEMENT ON BEEKEEPING

Do you engage on beekeeping?	Number of Respondents	Percent
Yes	18	21.4
No	66	78.6
Total	84	100.0

Source: Muğla YEKA Field Study Findings, July 2024

Honey and other beekeeping products, which are characteristic and highly valued in the region, hold a special place in the Muğla area. When examining the distribution of hives among households, ownership of 200 and 250 hives emerges as the most frequent response. The 14 households that own a total of 3,685 hives have an average of 263.2 hives per household. The average number of hives across all households is 46.6. Beekeeping, which is highly sensitive to ecological changes, appears vulnerable in this region to potential impacts of the project, such as dust, vibrations, and a decrease in plant diversity.

TABLE 0-31 NO OF BEEHIVES OWNED

How many beehives do you own?	Number of Respondents	Percent
10	1	1.2
15	1	1.2
40	2	2.4
70	3	3.6
100	8	9.5
300	2	2.4
700	1	1.2
0	66	78.6
Total	84	100.0

Source: Muğla YEKA Field Study Findings, July 2024

Beekeeping activities are carried out by PAPs within the boundaries of the beekeeper's own village (11.8%) and in other cities and in the village (7.2%).

TABLE 0-32 THE LOCATION OF BEEKEEPING ACTIVITIES

Where beekeeping is carried out	Number of Respondents	Percent
Not engaged	66	78.6
Within the boundaries of his own village	10	11.8
In another cities (Mobile beekeeping)	2	2.4
In other cities and in the village	6	7.2
Total	84	100.0

Source: Muğla YEKA ESIA Field Study Findings, July 2024

It is striking that 81% of the responses to the question regarding the extent to which beekeeping might be affected by the project were concentrated in the "no idea" category. This indicates that PAPs lack detailed information about the project and are therefore unable to make an estimation about the potential level of impact.

TABLE 0-18 EXPECTATION REGARDING THE IMPACT ON BEEKEEPING ACTIVITIES

Will your beekeeping activity be affected by the Project?	Number of Respondents	Percent
Yes	11	13,1
No	5	6.0
No idea	68	81
Total	84	100.0

Source: Muğla YEKA Field Study Findings, July 2024

When the opinions on the expected impacts on beekeeping are evaluated, it is seen that the main concern is due to noise and vibration.

TABLE 0-33 PERCEPTIONS OF PROJECT IMPACT ON BEEKEEPING

Expected impacts on Beekeeping	Number of Respondents	Percent
No impact will be occurred	75	89.2
The flight of bees will be negatively affected by noise and vibration	4	4.8

Expected impacts on Beekeeping	Number of Respondents	Percent
Dust and noise adversely affect honey resources of bees	3	3.6
The yield will decrease because the natural balance will be disturbed	2	2.4
Total	84	100.0

Source: Muğla YEKA ESIA Field Study Findings, July 2024

A detailed examination of how livestock and beekeeping activities might be affected by the Falp WPP reveals a clear outcome, as previously mentioned in neighborhood-based breakdowns: the local population generally lacks knowledge about the potential impacts of the project.

On May 12, 2022, meeting was held with the local community at the Sakarkaya Village Coffeehouse. In Çukur, Konak, and Narhisar neighborhoods, 100% of respondents answered "no idea." Despite the fact that information meetings were conducted by the Project Company in 2022, site findings suggest that awareness levels in these neighborhoods remain low. In İkiztaş neighborhood, concerns about the sustainability of beekeeping and qualitative and quantitative losses of pastures are observed at a rate of 6.7%. In Kayabükü neighborhood, responses indicate concerns about the shrinking and declining productivity of pastures.

In Sakarkaya, where the "no idea" option stands out at 80%, this is the lowest rate among the neighborhoods. Looking at the responses regarding the expected impact, "loss of productivity in pastures" ranks first with 8%.

TABLE 0-34 PERCEPTIONS OF PROJECT IMPACT ON BEEKEEPING AND HUSBANDRY

Settlement		Can you explain the loss of income you think you will experience?							Total
		No idea	Bees will be adversely affected, and when agricultural products are affected, there will be a shortage of feed for animals	Bees will be affected by vibration and sound, honey production will decrease	It will prevent animals from roaming the pastures, and land restrictions will narrow our livestock area	Our pasture area will shrink and become inefficient	In the project area, our goats graze in the forest area, if there are restrictions, we will have grazing costs	Our feed cost will increase	
Çukur	Count	14	0	0	0	0	0	0	14
	%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%

		Can you explain the loss of income you think you will experience?							Total
Settlement		No idea	Bees will be adversely affected, and when agricultural products are affected, there will be a shortage of feed for animals	Bees will be affected by vibration and sound, honey production will decrease	It will prevent animals from roaming the pastures, and land restrictions will narrow our livestock area	Our pasture area will shrink and become inefficient	In the project area, our goats graze in the forest area, if there are restrictions, we will have grazing costs	Our feed cost will increase	
İkiztaş	Count	13	1	0	1	0	0	0	15
	%	86.7%	6.7%	0.0%	6.7%	0.0%	0.0%	0.0%	100.0%
Kayabükü	Count	5	0	0	0	1	0	0	6
	%	83.3%	0.0%	0.0%	0.0%	16.7%	0.0%	0.0%	100.0%
Konak	Count	9	0	0	0	0	0	0	9
	%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%
Narhisar	Count	10	0	0	0	0	0	0	10
	%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%
Sakarkaya	Count	20	0	1	0	2	1	1	25
	%	80.0%	0.0%	4.0%	0.0%	8.0%	4.0%	4.0%	100.0%
Total	Count	71	1	1	1	2	1	1	79
	%	89.9%	1.3%	1.3%	1.3%	3.9%	1.3%	1.3%	100.0%

Source: Muğla YEKA ESIA Field Study Findings, July 2024

Another livelihood activity was asked to PAPs whether they used the forests around their village/neighborhood to collect mushrooms, and medicinal plants.

PAPs benefiting from forests stated that they benefit from forests by collecting mushrooms, and wood. 70.2% of PAPs who do these activities are of the opinion that the Project will negatively affect these activities and forests.

TABLE 0-35 PAPs' UTILIZATION OF SURROUNDING FORESTS

Utilizing forests	Number of Respondents	Percent
Yes	59	70.2
No	25	29.8
Total	84	100.0

Source: Muğla YEKA ESIA Field Study Findings, July 2024

When examining the data on how forest-dependent PAPs utilize forest resources, it is observed that the primary form of utilization is mushroom collection. This is followed by responses indicating "wood" and "mushroom and wood" as other forms of utilization.

TABLE 0-36 FOREST PRODUCTS COLLECTED

What products do you collect?	Number of Respondents	Percent
Not engaged	30	35.7
Mushroom	35	41.7
Mushroom, pine nuts	11	13.1
Wood	4	4.8
Mushroom and wood	3	3.6
Mushrooms, medicinal plants	1	1.2
Total	83	100.0

Source: Muğla YEKA ESIA Field Study Findings, July 2024

16 of the PAP responses (19.0%) indicate that the forest will be affected by the project, while 24 responses (28.6%) suggest it will not be affected.

TABLE 0-37 PERCEPTIONS OF PROJECT IMPACT ON FORESTS

Do you think these forests could be affected by the project?	Number of Respondents	Percent
Not engaged	44	51.8
Yes	16	19.0
No	24	28.6
Total	84	100.0

Source: Muğla YEKA ESIA Field Study Findings, July 2024

According to PAP responses, the primary ways forest lands will be affected by the project include restricted access to forests and decreased yield due to dust. PAPs also think that a reduction in total forest area will lead to a decline in production.

TABLE 0-38 EFFECTS OF THE PROJECT ON FOREST LANDS

How do you think forest lands will be affected?	Number of Respondents	Percent
Not engaged	68	81.0
Access to forests will be restricted	5	6.0
Pine nut trees will be cut down	5	6.0
Due to the decrease in land, our products will decrease	2	2.4
Yield will decrease due to dust	4	4.6
Total	84	100.0

Source: Muğla YEKA ESIA Field Study Findings, July 2024

The concerns of PAPs, who are forest users, have been expressed as follows.

- Mushrooms are also decreasing as trees and area decrease
- Land quality will deteriorate
- Mushrooms will be crushed due to land loss
- Area will decrease as land is seized

- Land will be lost in the regions and collection will not be possible.
- Environmental pollution will occur
- Natural structure will deteriorate
- Morel mushroom is an important mushroom and if forests are affected, an important source of income for the village will be affected
- Project will restrict entry to areas where mushrooms and medicinal plants are located
- There will be no collection.
- Forest land will decrease
- Dust effect will affect trees and mushrooms
- The forest's quality will deteriorate when trees are cut down.

It is important to explain these effects to PAPs and define at what level the effects will occur and where the impact area will end.

ECONOMY AND EMPLOYMENT IN ETL AND ACCESS ROAD-AFFECTED VILLAGES

The economic structure of the villages impacted by the ETL and access road components of the FALP Wind Power Project is predominantly based on small-scale agriculture and livestock husbandry, supplemented in some areas by beekeeping, forest-based livelihoods, and seasonal labor migration. Olive cultivation stands out as a critical and multifunctional income source across nearly all settlements, not only for oil and table olive production but also as a provider of firewood and grazing areas, particularly in villages such as Saraçlar and Cumalar.

In Saraçlar, all households engage in olive farming, and the presence of approximately 2,000 head of cattle highlights the significance of large-scale livestock activities. Local stakeholders have expressed concerns about potential restrictions on access to actively used pasturelands and agricultural fields, especially in light of land acquisition and project-related construction activities.

Ektirli has experienced a shift in crop patterns from cotton to silage maize, and while olive farming remains relevant, past livestock practices have significantly declined due to the restriction of grazing on now-protected forest land. Residents also reported serious infrastructure challenges, such as narrow, poorly maintained roads and insufficient access to sanitation, education, and healthcare services.

In Ulukonak and Umcular, maize and other grain crops are still cultivated alongside olives. While Umcular has seen a rise in agricultural production in recent years, youth outmigration has led to labor shortages. Despite having around 1,500 head of cattle, the village suffers from gaps in education and health services, lack of sanitation infrastructure, and limited institutional support for modern agricultural practices.

Gölcük residents noted a decrease in agricultural activity due to land expropriation for a nearby dam project, although livestock herding remains relatively stable with around 1,200 head of cattle. Beekeeping has diminished, and concerns persist regarding how the ETL might affect the remaining pastures and forest areas, especially those located upslope of the dam.

In Gökyaka, there are significant public health concerns associated with nearby industrial activities. Residents have linked an increase in cancer cases to environmental conditions and fear the Project could further degrade water resources and grazing lands.

Cumalar relies on both fig and olive farming, but production has declined due to poor road access to agricultural plots. There is no internet infrastructure, and the closure of the local school and the limited presence of a family physician were cited as barriers to public service access.

Kırcağiz has a highly seasonal population—reaching 3,000 in summer and decreasing to 800 in winter. Despite continued reliance on olive and livestock production, rising agricultural costs have led to a growing number of abandoned fields. The village hosts around 1,000 head of cattle across 700 households, 2,000–3,000 small ruminants in 30 households, and approximately 20 households engaged in beekeeping. Community members raised concerns about construction dust during the olive flowering season, which could result in significant yield losses.

Şenköy combines olive farming with large ruminant husbandry and includes vulnerable groups such as low-income families and persons with disabilities. Concerns were raised about deteriorating air quality, rising cancer incidence, and inadequate electricity, internet, and school transportation services.

Sarıkaya is noted for vegetable farming, commercial beekeeping (with around 1,000 hives across 5 households), and livestock (with ~800 head of cattle in 80 households). Past infrastructure damage caused by previous wind and mining projects has led to distrust. The mukhtar reported fears that the Project may harm soil quality, olive groves, and bee populations.

Çukur Village is directly affected by the construction of ETL in terms of income since as informal user to pine nut trees, they will be affected significantly. Within the Project's area of influence, pine nut collection and processing constitute a critical livelihood activity, particularly in Çukur Village, which is classified as a forest village (orman köyü). The majority of pine nut-bearing trees are located within forest land rather than private property boundaries—approximately 80% within forest areas and only 20% on privately titled land.

A total of 130 households are engaged in pine nut collection as a primary or supplementary income source. These forest areas, where pine nut production is concentrated, are located in and around the planned ETL (Energy Transmission Line) corridor, meaning that several productive stands may be situated close to the final alignment. Pine nuts (*Pinus pinea*) are typically harvested between November and May, when cones mature and open naturally. The ETL route has now been finalized. Given the seasonal and labor-intensive nature of harvesting the number of households whose livelihoods may be affected should now be assessed through a location-specific evaluation, considering proximity to productive forest areas and the degree of dependence on pine nut income. Findings shall be annexed to this report.

6. LIVELIHOOD IMPACT ASSESSMENT

The sub chapters below provide a detailed assessment of livelihood impacts due to the Project.

6.1. PROJECT IMPACT SUMMARY

Based on the above baseline findings, the livelihood-related risks and impacts of the project can be summarized and assessed in detail. The ESIA and LRP (Livelihood Restoration Plan) process have identified a range of social impacts on land-based livelihoods in the Area of Influence. These include both direct impacts (such as loss of land or resources due to land acquisition) and indirect impacts (such as reduced productivity from environmental disturbances). The affected communities – who mainly practice agriculture, grazing, and beekeeping – have clear expectations that the project should prevent or mitigate these impacts to the extent possible. In line with EBRD Environmental and Social Requirements and IFC Performance Standards, the project will implement a suite of management plans (e.g. a detailed LRP, Stakeholder Engagement Plan, Community Health & Safety Plan, etc.) to avoid, minimize, and compensate for livelihood losses.

Table 0-39 presents a summary of the key livelihood-related impacts identified, the project phase during which they occur, and the corresponding mitigation measures proposed. This revised table incorporates the FALP-specific socio-economic context highlighting issues like olive groves, beekeeping, and forest resource use and it outlines targeted measures to address the community concerns documented in the baseline.

TABLE 0-39 IDENTIFIED LIVELIHOOD-RELATED IMPACTS AND PROJECT PHASES

Impact Topic	Project-Affected People (PAPs)	Phase	Impact Description	Suggested Mitigation Measures
Construction related impacts on Lands and Livelihoods	Local landowners, smallholder farmers, herders, forest users, and beekeepers in the Project Area of Influence (AoI)	Primarily Construction phase; some residual effects during Operation	<ul style="list-style-type: none"> - Damage to animals and assets: Project traffic increases risk of injury to free-roaming livestock and may cause unintentional damage to fences, wells, or access structures used in farming or herding. - Dust impacts on crops and hives: Olive groves, pine nut and chestnut trees, and bee forage may be affected by dust emissions during construction, especially during flowering seasons (e.g., olive trees in spring). Dust may impair pollination and reduce yield. - Livelihood disruption from land acquisition: Acquisition of privately owned olive groves, pasture, or forest-interfacing land (including treasury land under informal use) for turbine pads, roads, and ETL may result in temporary or permanent economic displacement. As most PAPs rely on a single income stream, the loss of a field or grove may result in significant hardship. - Restricted access to pastures and forests: Construction may block customary footpaths or grazing corridors, affecting herders and forest product collectors. This includes mushroom, wood, and pine nut gatherers. - Reduced beekeeping productivity: Dust and vibration near apiaries (notably in Çukurköy and Konak) could disturb bee foraging. Migratory beekeepers may also face route constraints or hive disturbance. 	<ul style="list-style-type: none"> - Enforce strict speed limits (<30 km/h) on project roads; provide traffic signage near pastures and grazing routes. - Regularly water construction roads and turbine access roads (≥3 times daily in dry seasons). Coordinate high-dust works to avoid olive flowering periods. Monitor dust at apiary and crop-sensitive locations. If the contractor fails to implement dust control measures, any resulting crop losses should be fully compensated. - For land acquisition, follow the LRP framework and pay compensation prior to access. Ensure full replacement value and support transitional income loss if planting or grazing is disrupted. Give notice prior to clearing. - Avoid olive groves and pasture areas where possible through micro-siting. Consider alternatives to minimize forest clearance. - Identify migratory and local beekeepers in AoI before works. If within impact zone, provide hive relocation assistance and protective screens. Avoid construction near hives during active foraging hours. - Maintain or restore community access routes to pasture, forest and agricultural land. Consult with local muhtars to identify critical footpaths before works. Avoid fencing off large areas. - Restore disturbed land using native and pollinator-friendly vegetation, including pine, chestnut, and forage species. - Establish a grievance redress mechanism and assign two Community Liaison Officers to track and respond to livelihood-related concerns, including damage to crops or animals.

Impact Topic	Project-Affected People (PAPs)	Phase	Impact Description	Suggested Mitigation Measures
<ul style="list-style-type: none"> Impacts on Vulnerable Groups 	<ul style="list-style-type: none"> Elderly-headed households (65+), low-income families, individuals with chronic illness or disabilities, informal land users without legal tenure 	<ul style="list-style-type: none"> Construction and Operation 	<ul style="list-style-type: none"> - Elderly and chronically ill PAPs may face heightened exposure to dust, noise, and project-related traffic, especially during prolonged construction activities near residential areas or agricultural plots. - Low-income and landless PAPs who depend on informal use of treasury or forest lands (e.g. for grazing, beekeeping, or collecting forest products) are at risk of economic displacement but may not qualify for statutory compensation under national law. - Vulnerable individuals may be unaware of their eligibility for livelihood support or miss participation in stakeholder engagement processes due to mobility constraints, low literacy, or lack of communication access - Without targeted restoration measures, livelihood losses among these groups may exacerbate existing poverty and social exclusion. - Exclusion of women and youth from project jobs due to systemic gender inequality and low participation in technical fields, - Risks of discrimination, harassment, and GBVH in camps - Traditional gender roles may restrict women's mobility and participation in decision-making processes related to resettlement and compensation. This can result in their needs and concerns being overlooked, exacerbating the negative impacts of displacement. - In many rural areas of Turkey, women are less likely than men to hold formal jobs or own land, making them more dependent on informal livelihoods and family networks. Resettlement can disrupt these fragile support systems, leaving women with fewer resources to adapt. 	<ul style="list-style-type: none"> - Vulnerable households early in the land acquisition process have been identified. Based on these information maintain a vulnerability register within the LRP implementation phase. Tailor livelihood restoration activities (e.g. input support, in-kind assistance, or temporary income measures) to their specific needs. - For informal users (e.g. forest gatherers, herders, informal users of the lands), develop transitional assistance measures under the LRP, including livelihood inputs (e.g. small ruminants, feed, tools) or negotiated land access alternatives. - Ensure mobile and home-based consultations are carried out with elderly, disabled, or female-headed households. Materials should be presented in simplified, oral, or visual formats when necessary. - Prioritize vulnerable PAPs for non-land-based livelihood support (e.g. small-scale farming, animal husbandry input kits, fodder provision, or beehive restoration) to prevent income insecurity. - Monitor vulnerable household well-being during and after project implementation through dedicated LRP tracking indicators (e.g. income restoration, food security, access to services). - Promote trusted, low-barrier grievance channels, including grievance registration via local muhtars or designated CLOs, and ensure grievances from vulnerable persons are tracked and addressed with priority.

Impact Topic	Project-Affected People (PAPs)	Phase	Impact Description	Suggested Mitigation Measures
			<ul style="list-style-type: none"> In rural Turkey, women often contribute significantly to agricultural activities and household-based production, typically without formal recognition or pay. Resettlement may sever their access to land and livestock, undermining both their economic contributions and food security. Since many women in Muğla are engaged in informal, seasonal, or care-related work, they may not be officially registered as landowners or wage earners. This can lead to their exclusion from compensation schemes that prioritize formal employment or documented land use. Elderly women, those with limited mobility, and seasonal migrant workers face compounded challenges during resettlement, including reduced access to remedy and benefit-sharing mechanisms, limited ability to relocate independently, and increased risk of social isolation. Women are frequently primary caregivers for children and elderly family members. Relocation can increase their workload due to unfamiliar environments, longer distances to schools and health services, and reduced community support, further limiting their ability to engage in income-generating activities 	

ECONOMIC DISPLACEMENT IMPACT

No residential or commercial physical structures are located within the Project footprint; therefore, no physical resettlement is anticipated. However, temporary or permanent economic displacement may occur due to land acquisition, access restrictions, and disruption of land-based activities, particularly in the following contexts:

- Expropriation of forest and treasury lands used for seasonal grazing, beekeeping, and informal livelihood practices
- Damage to olive groves and agricultural lands due to dust, heavy machinery movement, or construction activities
- Restricted access to pasturelands and cultivated fields, especially in areas near the ETL, turbine locations, and transportation roads
- Cumulative livelihood impacts where multiple project components (turbine area, camp site, transmission line) converge
- Perceived or actual limitations on traditional land use, such as herding, olive harvesting, or forest product collection, stemming from safety concerns, noise, traffic, or unclear information regarding future access rights

Settlements at risk of economic displacement include:

Gökyaka, Saraçlar, Ektirli, Ulukonak, Gölcük, Umcular, Cumalar, Abak, Şenköy, and Çukurköy (ETL impacts)

- Sarıkaya, Kırcağız, and Kargıcak (transportation road impacts)

Narhisar (animal safety, dust impacts on olives and pastures)

These communities depend on a combination of agriculture, livestock breeding, beekeeping, and in some cases, forest access for their livelihoods. In particular, olive and grain cultivation are vulnerable to dust-related yield loss, and accidents involving free-grazing animals due to traffic have been reported as major concerns.

Key Livelihood Mitigation Measures

The Project will implement the following measures to avoid, minimize, or compensate for livelihood impacts in line with IFC PS5 and the 2023 IFC Good Practice Handbook:

- Preparation and implementation of this Livelihood Restoration Plan (LRP)
- Targeted consultation with vulnerable groups (e.g. women, elderly-headed households, informal users) throughout the LRP process
- Beekeeper identification and hive relocation support prior to construction in dust or vibration-prone areas
 - During baseline household and mukhtar consultations, local beekeeping activities were recorded; however, the number of hives and active beekeepers in forested areas varies seasonally.
 - Under the LRP, 65 of households engaged in local beekeeping in the villages have been identified and budgeted for.
 - In addition to these households, the presence of migratory beekeepers is also recognized.

- Therefore, a field-based verification of hive locations and numbers will be required closer to the construction period, taking into account seasonal variations.
 - Once the final ETL alignment is confirmed, this verification should be repeated immediately prior to construction to ensure accurate identification and timely relocation or other support measures.
- Full compensation for land and asset losses, including trees, crops, and loss of access due to temporary or permanent land use restrictions
 - Dust suppression measures, including irrigation of access roads three times per day in summer
 - Support for vulnerable households in acquiring alternative lands or implementing non-land-based livelihood options if income sources are lost
 - Prioritization of affected individuals for employment opportunities
 - Strict control of construction zones to minimize off-site damage to assets or lands; contractor accountability for compensation
 - Monitoring of cumulative livelihood impacts, especially in Çukurköy, and implementation of tailored mitigation responses
 - Implementation of interim support programs (e.g. fodder, agricultural inputs) in cases of seasonal access restriction to grazing or cultivated areas

Deployment of Community Liaison Officer (CLO) to monitor land-related grievances and support vulnerable groups

- Inclusion of LRP-related engagement activities in the Stakeholder Engagement Plan (SEP)
- Accessible and inclusive grievance mechanism, including offline/low-literacy intake points and field-based resolution

TABLE 0-40 SOCIO-ECONOMIC IMPACTS – LAND AND LIVELIHOODS

Category	Construction	Operation	Decommissioning
Type of impact	Direct	Direct	Direct
Receptor	Local Communities	Local Communities	Local Communities
Receptor sensitivity	Medium	Low	Low
Nature of impact	Negative (-)	Negative (-)	Negative (-)
Extent	Local/Site-level	Local/Site-level	Local/Site-level
Duration	Short-term	Ongoing	Short Term
Number of Households	Daily	n/a	Daily
Likelihood	Very likely	Unlikely	Probable
Magnitude of effect	Medium	Small	Small
Impact significance (w/ mitigation)	Major	Insignificant	Minor
Residual impact	Low	Insignificant	Insignificant

Category	Construction	Operation	Decommissioning
Irreplaceable loss risk	Possible (worst-case)	None	None
Reversibility	Reversible	Reversible	Reversible
Mitigation effectiveness	Difficult but effective	Effective	Easy but effective
Confidence level	High	High	High

6.2. AFFECTED USE OF FOREST, TREASURY AND PRIVATE LANDS

The core infrastructure of the FALP WPP including all turbine locations, the switchyard, internal access roads and excess excavation material storage areas will be located entirely on state-owned forest land, as confirmed by cadastral data and the FALP EIA. According to Project land acquisition data and EIA, all turbines are situated on forest-designated parcels in Muğla and Aydın provinces, specifically within the settlements of Sakarkaya, Çukur, Konak, Narhisar, and Kullar.

In addition to the turbine platforms, land will be temporarily required for infrastructure such as the switchyard and excess excavation material storage areas, all of which are also on state forest lands.

ACCESS ROADS AND ENERGY TRANSMISSION LINE (ETL) IMPACTS ON PRIVATE LAND

While the majority of Project infrastructure avoids private land, the energy transmission line (ETL) and associated transportation/access roads intersect with privately owned agricultural plots in several rural communities. Indeed, the ETL encompasses 499 total parcels – 410 of which are privately owned. This may lead to partial expropriation, easement agreements, or temporary restrictions on land use.

Based on data available as of July 2024, the following settlements have been preliminarily identified as likely to be affected:

TABLE 0-41 THE SETTLEMENTS LIKELY TO BE AFFECTED BY THE ETL AND ACCESS ROADS

Settlement	Impact Component
Gökyaka	Energy transmission line
Saraçlar	Energy transmission line
Ektirli	Energy transmission line
Ulukonak	Energy transmission line
Gölcük	Energy transmission line
Umcular	Energy transmission line
Cumalar	Energy transmission line
Abak	Energy transmission line
Şenköy	Energy transmission line
Sarıkaya	Access road
Kırcağız	Access road

Settlement	Impact Component
Kargıcak	Access road

These settlements are mainly agricultural communities where livelihoods rely on olive cultivation, dry farming, livestock grazing, and forest-based activities. The extent of economic displacement will depend on whether:

- Whether parcels are fully or partially expropriated,
- Whether the affected land constitutes $\geq 20\%$ of a household's total productive landholding,
- Whether functional livelihood disruptions occur (e.g. fragmentation, loss of outbuildings, or access pathways).

As of the March 2025 fieldwork, parcel-level data for these areas was still being compiled. Once alignments are finalized, detailed socio-economic impact assessments and entitlement verifications will be undertaken through participatory methods, consistent with the LRP framework. As of October 2025 the ETL route has been finalized, and additional asset and inventory valuation in line with full replacement cost is required for the route prior to the initiation of expropriation.

Additionally, in compliance with IFC PS5 and EBRD ESR5, the Project will identify informal users of forest and treasury lands (e.g., goat herders, fuelwood gatherers, seasonal beekeepers), who may not hold legal title but are economically dependent on these lands. These users will be included in the LRP via:

- Field-based verification,
- Consultation with mukhtars and forestry officials,
- Access to transitional livelihood support or in-kind assistance (e.g. fodder, equipment, or alternative access arrangements).
- To ensure fair and inclusive outcomes, the following LRP measures will be implemented:
- Cadastral verification and stakeholder engagement will determine affected privately used lands.

Clear information disclosure on eligibility criteria, grievance mechanisms, and compensation processes will be delivered through the Stakeholder Engagement Plan (SEP) and dedicated LRP consultations.

ORPHAN LAND

Orphan land refers to small, fragmented parcels of land that are left behind or rendered unusable due to project-related land acquisition. These parcels are often too small, irregularly shaped, or isolated to support viable agricultural or economic use. Orphan land typically results from partial land acquisition for infrastructure projects like wind farms, where only a portion of a landholding is taken, leaving the remainder economically nonviable or inaccessible. This can lead to economic displacement for affected landowners and users, especially those engaged in

subsistence farming or informal land use, as they may lose critical livelihood resources without formal recognition or compensation.

Following the field survey for the ETL, the presence of any orphan or economically unviable land will be assessed and, if identified, the findings and corresponding entitlements will be included in the LRP addendum.

Where land acquisition or restrictions on land use affect only part of a person's landholding, but the remaining land becomes economically unviable, the project should offer to acquire the entire property and provide full compensation to relevant PAPs.

IMPACTS ON FOREST AND TREASURY LAND USE & INFORMAL USERS

This section assesses the potential livelihood impacts related to the Project's use of state-owned forest and treasury lands, particularly in terms of informal and customary land use by surrounding communities. While these lands are not subject to formal ownership or agricultural registration, they represent a vital component of the local livelihood system—used for seasonal grazing, beekeeping, and non-timber forest product (NTFP) collection. The analysis covers two main sub-sections:

Use of Forest Land: Based on field visits, stakeholder interviews, and cadastral overlays, this subsection identifies forest-edge usage patterns in Çukur, Çomakdağı, Konak, Sakarkaya, Sarıkaya, İkiztaş, Ketendere, Kayabükü and Narhisar, where the core infrastructure will be located. The impacts of fencing, temporary access restrictions, and displacement of seasonal activities are evaluated.

Use of Treasury Land: The Project's access roads and transmission lines will traverse treasury-owned parcels in several other settlements. Although these lands will not be expropriated, construction-related disruptions may temporarily affect informal users. The subsection outlines the type and extent of such uses and proposes mitigation through the LRP framework.

Both sub-sections feed into the broader livelihood impact framework of this LRP, ensuring that informal land users and vulnerable groups are recognized and supported under IFC Performance Standard 5, even if they lack formal legal title.

USE OF FOREST LAND (ÇUKUR, ÇOMAKDAĞI, KONAK, SAKARKAYA, SARIKAYA, NARHISAR, İKİZTAŞ, KETENDERE, KAYABÜKÜ)

The core infrastructure of the FALP WPP including all confirmed turbine locations, switchyard, excess excavation material storage areas is situated entirely on state-owned forest land, as confirmed through cadastral records. While no formal residential or agricultural activity takes place directly on these forest parcels, field consultations in March 2025 confirmed that these areas are widely used for informal, seasonal, and customary livelihood activities by surrounding communities.

Key forest-based uses include:

- Beekeeping, especially mobile apiaries placed along forest access roads and clearings during the summer months;
- Seasonal livestock grazing, particularly by goat herders accessing forest peripheries from Çukur, Sakarkaya, and Kullar;
- Collection of non-timber forest products (NTFPs), including mushrooms, herbs (e.g., thyme, oregano), and firewood, primarily for household consumption.

These uses are not formally registered and are not eligible for compensation under Turkish expropriation law. However, in line with IFC Performance Standard 5, users who lose access to natural resources critical to their subsistence or income are eligible for livelihood restoration support, regardless of tenure status.

TABLE 0-42 STATE FORESTS USAGE INFORMATION

Settlement	Forest Product Collection (households)	Livestock Grazing (households)	Beekeeping (active beekeepers)
Çukur	180	~40 (goat herders)	35 (of which ~20 are mobile)
Sakarkaya	120	25	15
Kullar	100	30	12
Konak	60	Limited	8
Narhisar	30	Limited	5

Source: Muğla YEKA ESIA Field Study Findings, July 2024, March 2025

Field visits indicated that construction-phase activities—particularly fencing, road grading, and heavy machinery movement—may disrupt:

- Informal access paths used for grazing and hive placement;
- Seasonal grazing cycles, particularly during the late summer and early fall;
- Forest-edge areas used for mobile apiary placement or NTFP gathering.

Although the permanent footprint of turbines and infrastructure is relatively limited, temporary access restrictions and safety-related fencing may disproportionately affect households who depend on these resources.

TREASURY LANDS (GÖKYAKA, UMCULAR, CUMALAR, SARIKAYA, GÖLCÜK, ALEYHAN, ABAK, SARAÇLAR)

Project components such as the energy transmission line (ETL) and access roads will also intersect treasury-owned land parcels, particularly in the settlements of Gökyaka, Cumalar, Umcular, Gölcük, Aleyhan, Abak, Saraçlar and Sarıkaya. These parcels will be subject to easement rights rather than outright expropriation. However, field assessments confirmed informal usage of these lands for:

- Seasonal grazing and pasture connectivity (especially in Cumalar and Umcular);
- Access routes to forest areas and agricultural parcels;
- Inter-parcel mobility for livestock and agricultural equipment.

These uses are not formally documented, yet they serve as critical links in the seasonal and spatial livelihood systems of local communities. During the construction phase, fencing, trenching, or vehicle movements may temporarily obstruct:

- Grazing mobility routes used by goat and sheep herders;
- Informal paths for beekeepers transporting hives;
- Connections between household plots, particularly for households without alternative routes.

IMPLICATIONS FOR THE LIVELIHOOD RESTORATION PLAN

The LRP recognizes that informal users of forest and treasury lands are among the most at-risk groups for unrecognized economic displacement. To mitigate these risks, the following measures will be implemented:

- **Participatory verification of resource users**, including interviews with mukhtars, forestry officials, and livestock cooperatives;
- **Transitional livelihood assistance** for eligible forest users, such as fodder support, relocation assistance for hives, or access restoration;
- **Entitlement to non-cash compensation** (e.g. input packages, equipment, or access corridors) for those experiencing temporary but significant disruption;
- **Monitoring of access barriers and restoration effectiveness**, particularly during the construction phase;
- **Grievance redress mechanisms** tailored for mobile or seasonal users.

TABLE 0-43 TYPES OF ANTICIPATED DAMAGE AND IMPACTS

Damage Type	Description
Dust-Related Crop Loss	Heavy vehicle traffic and excavation works on unpaved access roads near olive groves in Çukur, Sakarkaya, and Narhisar may reduce fruit yield due to dust deposition.
Damage to Productive Trees	Olive and fruit trees bordering construction roads and laydown areas may be affected by machinery contact, grading, or compacted soil.
Damage to Agricultural Assets	Terracing walls, small irrigation channels, fences, or field boundaries may be unintentionally damaged by road widening or access route realignment.
Beekeeping Disruption	Forest road works in Çukur and Kullar may cause dust, vibration, or temporary relocation of hives, particularly affecting mobile beekeepers in spring-summer.
Soil Compaction / Runoff	Compaction from construction vehicles may affect drainage and germination in adjacent agricultural plots, especially in lower-lying sections of Sakarkaya and Konak.

6.3. VULNERABILITY ASSESSMENT

IFC defines vulnerable individuals or groups as those who, due to their social identity or status, are more likely to be adversely affected by project impacts, and may experience limited capacity to anticipate, cope with, resist, or recover from these impacts. Such status may be linked to age, gender, income level, literacy, disability, or informal use of land and natural resources.

In accordance with IFC Performance Standard 5 and EBRD Performance Requirement 5, vulnerable groups in the FALP WPP AoI were identified through field-based socio-economic surveys, mukhtar interviews, and institutional consultations conducted between July 2024 and March 2025 across the settlements of Çukur, Saraçlar, Cumalar, Ulukonak, Şenköy, Gökyaka, and neighboring villages.

Table 0-44 summarizes identified vulnerable groups across the settlements. Categories are not mutually exclusive, and some households may appear in more than one category (e.g., a female-headed household with elderly or disabled members):

TABLE 0-44 VULNERABLE HOUSEHOLDS

Vulnerability Status	Gölcük	Saraçlar	Cumalar	Ulukona	Çukur	Şenköy	Gökyaka	Ektirli	Kırcağız	Umcular	Sarıkaya	Kayabükü	Narhisar	Konak	İkiztaş	Pınararası
Illiterate adult	6	6	10	8	6	5	0	0	0	10	0	3	0	10	0	4
Female head of household	30	80	15	20	20	7	20	25	150	25	15	10	15	8	0	0
People who live on aid from the state (institution, etc.)	30	10	15	15	20	6	20	9	0	15	0	0	0	0	0	0
Chronic disease/bedridden	0	0	1	8	5	0	10	2	0	0	0	0	2	3	0	3
Over 65 years of age living alone	35	81	15	20	0	10	60	10	250	11	20	20	20	10	0	2
People with physical/mental disabilities	1	13	2	6	5	2	6	4	0	0	5	0	4	3	0	4
Unemployed/head of household with insufficient income	30	10	20	0	30	1	30	0	0	30	0	0	10	25	0	0
Seasonal migrant workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Source: Muğla YEKA ESIA Field Study Findings, July 2024-March 2025-March 2025

Additional vulnerable groups in other settlements (e.g., İkiztaş, Pınararası, Konak) were also identified but are not directly impacted by land acquisition or infrastructure siting.

Key observations include:

- Elderly-headed households in Saraçlar, Şenköy, and Gökyaka are particularly dependent on non-mechanized subsistence farming and forest-based resources (e.g., grazing, product collection).
- Female-headed households are present in all settlements, often managing agricultural activities with limited access to formal tenure or support mechanisms.
- Low-income and unemployed households in Çukur, Şenköy, and Cumalar may be especially affected by temporary construction-phase income disruptions or reduced access to seasonal jobs.
- Chronic illness and disability were reported in small numbers but may hinder the ability of affected persons to participate in consultations or submit complaints unless outreach is tailored.

IMPLICATIONS FOR THE LRP

The LRP recognizes that vulnerable groups are at greater risk of unmitigated or prolonged hardship from land loss, access restrictions, or construction-related disruptions. Chapter 8 outlines tailored entitlements, including in-kind support, priority in skill-building or job referral programs, adapted consultation channels (e.g., home visits), and monitoring of livelihood restoration outcomes disaggregated by vulnerability status.

7. ELIGIBILITY, ENTITLEMENTS AND COMPENSATION

This chapter presents the LRP's entitlement matrix and explains the approach for determining eligibility and entitlements under the Project LRP.

7.1. CUT OFF DATE

Eligibility for compensation, livelihood restoration assistance, and other support under this LRP is determined according to the principles of IFC PS5, EBRD ESR5, and relevant Turkish laws. The intent is to ensure all PAPs who experience economic displacement as a result of the Project are fairly recognized and assisted, regardless of their formal land ownership status or legal tenure.

A fundamental criterion for eligibility is the establishment of a cut-off date. The cut-off date is the date on which the official census and asset inventory of PAPs was completed for the project area – this was March 2025 (as documented during the Muğla YEKA ESIA field study). During the census and asset survey, the Project team explained the cut-off date to local communities through village head (mukhtar) meetings and public consultations. Any individuals who began to occupy or use land in the Project area after this cut-off date are not eligible for compensation or livelihood support under the LRP. In other words, only persons who had land rights or were using the land/natural resources prior to March 2025 are eligible to receive project entitlements.

This cut-off date was publicly announced in all affected communities via local channels (mukhtar announcements, community meetings, and field visits) to ensure transparency. The cut-off mechanism is critical to prevent opportunistic claims from people who might attempt to take advantage of the project by moving into the area once project plans were known. No claims by new settlers or users after the cut-off will be considered, regardless of impact severity. Exceptions will be made only in very special cases for highly vulnerable individuals, and any such exceptions would require thorough verification and approval by a stakeholder committee. Overall, adhering to the cut-off date helps ensure fairness and integrity in the eligibility process.

In line with IFC PS 5 and EBRD ESR5, a cut-off date is intended to define eligibility for compensation and livelihood restoration under this LRP. While a comprehensive census and asset inventory have not yet been formally completed, preliminary field studies and stakeholder consultations conducted in March 2025 during the process serve as the basis for identifying initially affected persons and impacts.

7.2. ELIGIBILITY

Eligibility for compensation, livelihood restoration assistance, and other support measures under this LRP is determined in accordance with the principles of IFC Performance Standard 5, EBRD Environmental and Social Requirement 5, and relevant national laws. The aim is to ensure that all Project-Affected Persons (PAPs) who experience economic displacement as a result of the Project are recognized fairly, regardless of land tenure status or formality of use.

Eligibility is based on the cut-off date, defined as the date on which the official census and asset inventory was completed (March 2025). During the settlement visits, explanations were provided through headman meetings and public meetings. Any person who occupies or uses

land or natural resources in the Project AoI after this date is not eligible for compensation or livelihood support.

The following categories are considered eligible under the LRP:

TABLE 0-1 ELIGIBLE CATEGORIES OF PAPS

PAP Category	Definition and Criteria
Legal landowners	Individuals or entities with formally registered ownership (title deeds) in the land registry (cadastre).
Legal users of land	Individuals with official rights to use land, including formal leaseholders, registered tenants, and usufruct right holders.
Informal or de facto land users	Persons who cultivate, graze, or otherwise use land without formal title, including users of forest margins, treasury land, or commons.
Tenants and sharecroppers	Individuals with verbal or written agreements to occupy or use land for agricultural or livestock activities.
Seasonal or part-time users	Individuals or households that access land or natural resources seasonally (e.g., for grazing, beekeeping, or harvesting).
Users of communal or state resources	Persons who depend on non-titled areas for livelihood (e.g., pasture, firewood, forest resources) through customary or local use.
Owners of productive assets	Those who suffer damage to crops, trees, hives, fences, irrigation systems, or other agricultural/livelihood infrastructure.
Livelihood-dependent resource users	PAPs whose livelihoods are impacted by restricted access to land or productive resources, including roadside cultivators.
Vulnerable individuals and households	Elderly, disabled, female-headed, landless, low-income households, or others with limited coping capacity as defined in Section 7.2.

All claims of eligibility (for example, if someone comes forward asserting they were missed in the census) will be independently verified through field records, community validation, and documentation from the asset inventory. The project's social team will verify land tenure or resource use via evidence such as land registry checks, receipts, witness interviews, or on-site observations. Each affected person will be formally notified of their eligibility status and the specific entitlements they qualify for. In cases of disagreement or if a person believes they were wrongly excluded, they will be informed of their right to raise a grievance. A robust grievance process (described later) is in place to resolve any disputes about eligibility or entitlements transparently.

7.3. ENTITLEMENT MATRIX

The Entitlement Matrix provides a structured summary of the types of impacts identified under the Project, the corresponding compensation or livelihood support measures, and the tailored delivery methods. It has been developed in line with IFC PS5 and EBRD ESR5, ensuring that all PAPs including formal landowners, informal users, and vulnerable groups are covered equitably.

Entitlements are linked to the severity and nature of displacement, with categories including land loss, damage to assets or crops, loss of access to grazing or forest resources, and disruption of economic activities. The matrix operationalizes the broader Livelihood Restoration Program (LRP) by translating these impact types into specific support mechanisms such as cash compensation, in-kind assistance, hive relocation, or skill-building programs.

This staged and transparent approach helps prevent opportunistic land claims while ensuring that legitimate PAPs, particularly those at risk of exclusion, are not left behind in the compensation and restoration process fully in line with the intent of IFC PS5 and EBRD ESR5.

TABLE 0-2 ENTITLEMENT MATRIX

Impact Type	Eligible PAPs	Entitlement	Delivery Method	Responsible Party	Estimated Number of PAPs/Assets
Full or partial loss of privately owned agricultural land	Formal landowners or heirs	Cash compensation at full replacement cost including trees and improvements	Bank transfer	Enerjisa or TEİAŞ (for ETL)	TBD (following the survey results for the ETL route)
≥20% loss of total productive land or pasture access	Landowners, informal users or heirs	Transitional Livelihood Support (TLS)	Seasonal cash or in-kind support (fodder, fuel)	Enerjisa	~60–70 households (primarily from Kırcağız, Saraçlar, Çukur)
Restricted access to olive groves used for post-harvest grazing	Small livestock keepers (formal/informal)	Fodder support or access alternatives	In-kind support or alternate access provision	Enerjisa	~15 households (~60 tons estimated fodder need)
Damage to standing crops (e.g., olives) during construction	Cultivators of affected plots	Compensation based on seasonal yield loss	Field assessment and direct cash payment	EPC Contractor or Enerjisa	~900–1,000 olive trees; smaller number of cereals, vegetables
Damage to productive fixed assets (irrigation, fences, hives)	All asset holders	Repair or compensation at replacement value	Project or contractor-led repair or payment	EPC Contractor or Enerjisa	~100 assets (e.g., 30 irrigation, 50 fences, 20 hives)
Disruption of seasonal grazing or hive	Informal users or heirs	TLS, in-kind support, hive	Community-validated	Enerjisa	~600–800 local beehives, ~20

Impact Type	Eligible PAPs	Entitlement	Delivery Method	Responsible Party	Estimated Number of PAPs/Assets
placement in forest/treasury land		relocation assistance	list; in-kind or cash		grazing households
Blocked livestock crossing routes during construction	Shepherds and livestock-owning households	Safe passage routes or compensation for productivity loss	Physical route design + compensation as needed	Enerjisa	~10–15 households (notably in Sakarkaya, Narhisar, İkitişt)
Dust-related crop yield loss	Cultivators near unpaved roads	Compensation based on reduced productivity	Yield monitoring and seasonal payment	EPC Contractor or Enerjisa	TBD (expected ~12–18 affected plots)
Lack of formal tenure or shared use of family land /affected trees	Informal users or heirs, users of stone pine trees	Inclusion in TLS and other LRP support based on use verification Compensation for estimated profits derived from pine-related activities; and, where feasible, in-kind livelihood restoration options.	Verified through field visits and community input	Enerjisa	Included within TLS beneficiaries
Livelihood disruption among vulnerable groups	Elderly, female-headed, disabled, poor, landless	Priority support, supplemental assistance, tailored aid	Case-specific delivery; tracked in vulnerability register	Enerjisa	~100–120 households (based on verified vulnerable data)
Interest in agricultural skill development (esp. youth)	Young PAPs, women, vulnerable household members	Access to agricultural training programs	With İl Tarım Müdürlüğü or local experts	Enerjisa	~15 training events; ~150 expected participants
Partial land acquisition leading to orphan/unviable land	All asset holders, informal users or heirs	Acquisition of the entire landholding, including the residual parcel, if requested by the landowner and compensation at full replacement cost.	Bank transfer	Enerjisa	TBD (following the survey results for the ETL route)

8. LIVELIHOOD RESTORATION PROGRAMME

The Livelihood Restoration Programme is a comprehensive set of measures designed to restore or improve the livelihoods of all PAPs who are economically displaced by the project's land acquisition and associated restrictions on land use. It aligns fully with IFC PS5 and EBRD ESR5, aiming not only to compensate losses but also to provide PAPs with support to sustainably rebuild their income streams and quality of life. The LRP is built on the eligibility criteria, entitlement matrix, and vulnerability considerations described in previous sections, ensuring that all affected groups – including informal land users and vulnerable households – are appropriately covered.

8.1. LRP COMPONENTS

The LRP consists of multiple components that address different facets of livelihood restoration. Key components of the program (and their target groups) are presented in Table 0-3 below.

TABLE 0-3 LIVELIHOOD RESTORATION PROGRAMME OVERVIEW

Component	Target Groups	Delivery Timeline	Responsible Parties / Cooperation Needs	Inclusion Considerations
Cash Compensation	Formal landowners, registered tree and asset holders, All PAPs affected by construction damages (e.g. crops, fences)	Pre-construction & construction	Project, Expropriation Agency (EMRA), Real Estate Valuation Firms, Construction Contractor, Supervision Team, Social Team	Priority given to timely disbursement before construction start, Real-time tracking via GRM; includes support for unregistered losses
Transitional Livelihood Support (TLS)	Informal users, sharecroppers, and households losing $\geq 20\%$ land	Pre-construction to early works	Project, Social Consultant, Mukhtars	Vulnerability screening to prioritize women-headed and elderly households
In-kind Support	Livestock keepers and beekeepers losing grazing or apiary access	Construction	Project, Provincial Agriculture Directorate, local cooperatives	Fodder support and hive relocation scheduled by seasonality
Employment Facilitation	Local job seekers, youth, displaced informal workers	Construction and post-construction	Project, EPC Contractor, Local İŞKUR Office	Preference for affected households, especially unemployed youth/women
Agricultural Training	Small producers, women, youth	Mid-construction to post-construction	Provincial Agriculture Directorate, Vocational Training Centers, NGOs	Training modules to prioritize women/youth participation (min. 50%)
Vulnerability Assistance	Poor, disabled, elderly, women-headed households	Continuous	Project, Social Consultant, Local Government Units	Regular monitoring; tailored support including additional TLS or home visits

The Livelihood Restoration Plan is a structured, multi-component program fully aligned with IFC PS5 and EBRD ESR5. It builds upon the eligibility criteria, entitlement matrix, and vulnerability assessments. In essence, the LRP combines various compensation and assistance measures into an integrated strategy to address economic displacement. Key components of the LRP and their target groups and timing are summarized as follows:

- **Cash Compensation (for land, crops, trees, and other assets):** Provided to formal landowners (and other eligible parties like sharecroppers) to compensate for private land acquired and associated assets. *Timing:* Pre-construction (paid before the land is taken).
- **Transitional Livelihood Support (TLS):** Provided to households experiencing significant loss of land or productive resource access (defined as loss of $\geq 20\%$ of income, or loss of access to critical communal resources). This includes eligible informal users losing access to forest or pasture land. *Timing:* From pre-construction through the early construction period (to bridge the immediate income gap).
- **In-Kind Support (e.g. fodder provision, beehive relocation):** Provided to PAPs such as livestock keepers and beekeepers who suffer temporary disruptions. For example, if grazing land or apiary sites are affected, support in the form of animal feed or assistance moving beehives is given. *Timing:* Mainly during the construction phase when disruptions occur.
- **Damage-Based Compensation:** Provided to any cultivators or asset owners who experience damage to crops, trees, or infrastructure due to construction activities. For instance, if construction machinery damages an olive grove or an irrigation line, the project will compensate or repair. *Timing:* Throughout the construction period, as incidents occur.
- **Local Employment Facilitation:** The project will prioritize hiring local PAPs – especially those whose livelihoods are impacted – for employment opportunities generated by the project (e.g. construction works). *Timing:* Primarily during the construction phase (when most jobs are available).
- **Agricultural Training Programs:** Offered to interested PAPs (with a focus on youth, women, and small-scale farmers) to improve or diversify their agricultural and livelihood skills. These trainings aim to enhance long-term livelihood sustainability beyond the immediate project impacts. *Timing:* Conducted during construction and into the post-construction period.
- **Vulnerability Assistance:** Extra support mechanisms for vulnerable households (elderly, women-headed, disabled, very poor, etc.), which continue *throughout* LRP implementation. This may include additional financial aid, in-kind supplies, or other support on a case-by-case, continuous basis to ensure these households recover adequately.

Below, each of these components is described in detail, including how they will be delivered and managed:

8.1.1. CASH COMPENSATION PAYMENTS

Cash compensation payments represent the primary form of monetary redress provided to Project-Affected Persons (PAPs) whose land, crops, or assets are affected by the Project. These payments are designed to reflect the full replacement value of affected property in line

with national legislation, IFC PS5 and EBRD ESR5 requirements. The following sub-sections provide a detailed breakdown of the compensation categories, eligibility criteria, valuation methods, and payment procedures.

COMPENSATION FOR UNREGISTERED FIXED ASSETS

In many cases, PAPs have built or established assets on their land (or on public land) that are not formally registered – such as village fences, animal pens, storage sheds, beehives, or irrigation channels. Even though these structures may lack official title or building permits, the Project will compensate for any unregistered but productive fixed assets that are adversely affected by the project. During the asset inventory, such assets were identified and documented (including photographic evidence and, where needed, community witness statements to verify ownership/use).

Compensation for unregistered assets will be calculated at full replacement value. A certified independent assessor will evaluate each asset to determine the cost of replacing it (in line with IFC/EBRD valuation principles). This ensures that PAPs can rebuild or replace the structure or asset with an equivalent one. Depending on the PAP's preference, the compensation may be provided as a cash payment or through in-kind replacement (for example, the Contractor might rebuild a demolished wall, or the Project might provide equivalent materials).

It should be noted that compensating unregistered assets is part of the Project's entitlements framework – i.e. it is an *additional compensation* on top of land acquisition compensation. It does not substitute for any other livelihood support the PAP is eligible for. By recognizing informal property (like makeshift sheds or irrigation lines), the Project ensures that all productive investments by PAPs are duly compensated, even if they fall outside formal legal definitions.

CASH COMPENSATION FOR CROPS AND TREES

All standing crops and productive trees impacted by the Project will be compensated to ensure PAPs do not suffer income losses from agriculture. In the project area, the primary crop and perennial asset are olive trees (and their annual yield of olives). If an olive tree (or any fruit tree) is removed or damaged due to land acquisition or construction, the Project will compensate the owner at full replacement value. This valuation takes into account not just the market value of the wood or one season's fruit, but also the future income loss from that tree over its productive lifespan. Standard valuation formulas (as recommended by the Ministry of Agriculture and Forestry and consistent with IFC guidelines) will be applied – for example, considering the age of the tree, average annual yield, and market price per kg to calculate the net present value of future production.

For seasonal crops (like field crops or annual plants) that are damaged, compensation will be based on the value of the expected harvest lost. The yield (e.g. kilograms of produce per area or per tree) will be estimated in consultation with agricultural experts or based on the farmer's own records, and multiplied by prevailing market prices. These crop compensation payments will be made before the next planting season or as soon as possible after damage, to ensure the farmer has funds to recover.

All compensation for crops and trees will be paid in cash (via bank transfer when possible for transparency), directly to the affected cultivator or asset owner. In cases where crops are

cultivated by a tenant or sharecropper rather than the landowner, the compensation will be apportioned according to the sharing arrangements or agreements in place, to ensure the actual cultivator is compensated for their loss.

TABLE 0-4 COMPENSATION PAYMENTS

LRP measure	Compensation Payments												Proposed outcomes: Compensation at replacement cost for lost assets and maximization of yield by allowing for a last harvest of crops.																					
Links to Livelihood Activities:	<ul style="list-style-type: none">• Compensation for lost assets for reestablishing of livelihoods on alternative lands																																	
Required Partnerships:	<ul style="list-style-type: none">• Enerjisa Üretim Local Project Team (for coordination of project implementation, allocation of funds and compensation schedule)• Community Liaison Officers (for communication and facilitation with PAPs)• Local Government in Village and Sub-District Level (for fund transfer facilitation and oversight)																																	
Proposed Timelines:	2025												2026								2027													
	Q1	Q2	Q3	Q4									Q1	Q2	Q3	Q4					Q1	Q2	Q3	Q4										
Asset and Land Valuation																																		
Sign off of Valuation results																																		
Fund allocation and deposit of the required funds (incl. for vulnerability support)																																		
Establishment of shared bank accounts																																		
Transfer of funds to PAPs																																		
Transfer of Vulnerability Assistance																																		
Monitoring and Evaluation.																																		
Budgetary Considerations:	<ul style="list-style-type: none">• Will be dependent on valuation report developed by state qualified valuation experts.																																	

8.1.2. LOCAL EMPLOYMENT OPPORTUNITIES

To promote local benefit-sharing, the Project will give hiring preference to PAPs for jobs created during construction. Typical jobs include road construction, fencing, transporting materials, site security, and other semi-skilled or unskilled work. PAPs who have lost land or livelihoods will be prioritized in recruitment drives, as will members of vulnerable groups (e.g. women, young people seeking employment, and the unemployed in the affected villages).

Job announcements will be made in a transparent and equal manner to all affected PAPs, through mukhtars, the Project's Community Liaison Officers (CLOs), and contractors' relevant units. This approach ensures that PAPs are aware of available opportunities and can apply or be referred in line with contractor needs.

Given that employment opportunities under the Project are temporary, facilitating short-term certifications or training that may be required for specific roles (e.g., hygiene certificates, basic food handling or cooking certifications). Such support will help PAPs—particularly women and other vulnerable groups—meet entry requirements for project jobs and, at the same time, increase their prospects for securing employment beyond the Project.



TABLE 0-5 LOCAL EMPLOYMENT

LRP Measure:	Local Employment Opportunities																Proposed outcomes: Equip PAPs to take advantage of local job opportunities through aligned vocational training.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
Links to Livelihood Activities:	<ul style="list-style-type: none">As livelihood strategies available to PAPs are enhanced, additional skills development will be required to support the sustainability of these initiatives.PAPs expressed the desire to take advantage of employment opportunities made available through the Project, however, they may currently lack the skills to do so.Increased access to wage-paying work can reliably supplement household income from farming, and reduce shocks associated with climatic events or land scarcity.Skills development and training can be implemented alongside all other livelihood interventions to enhance their effectiveness.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
Required Partnerships:	<ul style="list-style-type: none">Basic business skills development specialists and/or service providers.Vocational skills development service providers.Local mukhtars and CLOs																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
Proposed Timelines:	2025																2026								2027																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
	Q1				Q2				Q3				Q4				Q1		Q2		Q3		Q4		Q1		Q2		Q3		Q4																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
Identification of suitable specialists and service providers.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										

8.1.3. MEASURES DURING CONSTRUCTION

DUST CONTROL AND CROP IMPACT MITIGATION

Construction activities such as turbine platform excavation, road leveling, and truck movement on unpaved village roads are expected to generate dust within the Project's Area of Influence. In the FALP region—characterized by widespread olive cultivation and the use of olive groves for seasonal livestock grazing—excessive dust can settle on leaves and flowers, reduce photosynthesis, and disrupt fruit development. This can lead to reduced olive yields, smaller fruit size, or lower oil content. Community feedback and baseline data confirm that dust is a primary concern for local cultivators, especially during the spring flowering and summer maturation stages of the olive production cycle.

To mitigate these impacts, the Project will implement a series of dust control measures, including:

- Regular watering of active construction areas and unpaved access roads (minimum 3 times per day during dry and windy conditions);
- Scheduling major excavation and soil movement works outside of the olive flowering period (April–May) where feasible;
- Covering or sealing temporary storage areas for fine materials (e.g. sand, soil) near agricultural zones;
- Installing vegetation barriers or protective netting between work sites and adjacent orchards, where appropriate.

In the event that dust emissions result in measurable damage to crop productivity, the Project will compensate affected farmers. Yield losses will be evaluated using a combination of:

- Comparisons between dust-exposed plots and similar unaffected reference plots;
- Review of recent baseline yield data (collected in 2024–2025);
- On-site observations by independent agronomists or Provincial Agriculture experts;
- Farmer testimonies collected through the Project's grievance mechanism.

Confirmed yield losses (e.g. a decline in olive harvest volumes attributable to dust exposure) will be calculated using current local market prices and paid directly to the cultivator. The Project will aim to process compensation within the same season to avoid delayed financial impacts on farming households.

These mitigation and compensation efforts are designed to ensure that farmers and rural households are not made worse off as a result of temporary environmental impacts caused by construction. Affected cultivators will also be informed in advance about planned works and dust control efforts, and they will be encouraged to report concerns early through the Project's operational grievance mechanism or via the Community Liaison Officer.

COMPENSATION FOR CONSTRUCTION-PERIOD DAMAGES

In addition to planned land acquisition and easement processes, the Project recognizes that some unintentional damage may occur during construction works, despite all preventive efforts. Such damage may include:

- Destruction of standing crops (e.g. olives knocked down during works, or cereals damaged by machinery or truck passage);
- Harm to productive rural infrastructure, such as irrigation hoses, boundary fences, beehives, simple livestock shelters, or small retaining walls;
- Soil degradation or rutting caused by the movement of heavy vehicles over agricultural plots or access roads;
- Disturbance to common grazing areas or forest tracks due to equipment mobilization or storage.

To address such impacts, the Project will operate a Construction Damage Compensation Protocol, allowing any damage to be identified, recorded, and compensated in a timely manner.

All reported or observed incidents will be:

- Documented by the Project's Environmental and Social (E&S) team or Contractor's designated supervisor;
- Recorded with photos and GPS coordinates where possible;
- Validated through consultation with the affected PAP, and—if needed—local leaders (e.g. mukhtar) or agricultural advisors.

PAPs are encouraged to report damage directly to the Community Liaison Officer (CLO) or via the Project's grievance mechanism. Once verified, the Project will either:

- Repair the damage directly (e.g. replace irrigation hoses or fix broken fences), or
- Provide cash compensation at full replacement value based on market rates and cost of materials/labor.

Responsibility for financing such compensation will rest with the party at fault—typically the Contractor—under the oversight of the Project E&S team. The Project will maintain a dedicated construction damage fund to ensure prompt and fair payments.

In parallel, the Project will implement preventive measures to reduce the risk of unintentional damage, including:

- Installing warning signs and protective barriers around active construction areas;
- Limiting vehicle access to sensitive grazing paths or orchard boundaries;
- Watering roads regularly to reduce dust impact on crops and beehives;
- Informing PAPs in advance of high-traffic construction zones.

The objective is to ensure that all affected individuals are promptly restored to their pre-impact condition, without needing to wait until the end of the construction phase.

Temporarily leased lands will be restored to their original condition upon completion of the works, unless otherwise requested or agreed by the landowners or users.

INHERITANCE RELATED MEASURES (IF ENCOUNTERED)

Inheritance related measures refer to provisions that ensure compensation, entitlements, and benefits are appropriately transferred to rightful heirs or successors when the original asset owner is deceased or unable to claim them. These measures are crucial in regions where land and property rights are often passed down through family lines, and where formal documentation may be limited or absent.

Inheritance related measures may include but not be limited to the following:

- Recognize heirs or successors when the original asset owner is deceased or unavailable.
- Accept customary or informal inheritance practices where formal documentation is lacking.
- Ensure vulnerable heirs (e.g. widows, children) are not excluded from compensation.
- Include heirs in entitlement matrices and benefit-sharing mechanisms.

SUPPORT FOR ANIMAL HUSBANDRY ACTIVITIES

PAPs in the Project AoI are engaged with various animal husbandry activities, such as animal grazing and beekeeping for their livelihood generation. Below sub chapters present LRP measures to restore livelihoods associated with animal grazing and beekeeping.

SUPPORT FOR ANIMAL GRAZING

Animal husbandry—including cattle and small ruminant rearing—remains a vital livelihood component across the Project's Area of Influence (AoI), particularly among households in villages such as Kırcağız, Saraçlar, Sakarkaya, and Çukurköy. While herd sizes tend to be modest (typically a few head of cattle per household), collective grazing practices and the use of olive groves for post-harvest livestock feeding are common strategies to manage limited pasture availability and reduce feed costs.

In the FALP Project area, farmers often allow animals to graze under olive trees after the autumn harvest, making use of natural vegetation and minimizing reliance on purchased feed. Additionally, informal forest-edge grazing routes are regularly used, especially in winter and early spring when household fodder stocks are low.

Potential construction-related impacts include:

- Temporary or seasonal loss of access to olive groves, pastures, or forest-edge grazing due to turbine foundation works or road construction;
- Increased household feed costs due to reduced grazing options;
- Disruption of traditional livestock movement routes (e.g. between barns and pastures or watering points).

To mitigate these impacts, the Project will implement targeted support measures for affected herders, including:

- **Fodder Support:** During periods when grazing areas are inaccessible due to construction, the Project will provide in-kind fodder support (hay, silage, or compound feed). Distribution will be based on verified herd size, number of impacted days, and seasonal needs.
- **Access and Transport Assistance:** If animals must be relocated to more distant grazing zones or if routes are temporarily cut off, the Project will assist with safe livestock transport or establish alternative paths (e.g., temporary fencing and signage to redirect herds).
- **Rotational or Temporary Access Solutions:** Where safe and feasible, the Project will coordinate with affected communities to enable limited access to certain construction

zones during non-active work periods (e.g. weekends or holidays). This may allow short-term supervised grazing to continue in partially completed turbine or road areas.

- **Alternative Grazing Arrangements:** In cooperation with mukhtars and affected herders, the Project will explore temporary access to unused community land or rescheduling certain works (e.g. pausing excavation during critical winter grazing periods) to minimize disruption.

Through these measures, the Project seeks to prevent livestock productivity losses and safeguard household food security and income continuity among small-scale herders in the FALP region.

SUPPORT FOR BEEKEEPING

Beekeeping is a significant supplementary livelihood in the FALP Project Area of Influence, particularly due to Muğla's long-standing reputation as a center of pine honey production. Approximately one-fifth of households in the region engage in apiculture, with many relying on nearby pine forests and forest-edge clearings for seasonal honey production. Some beekeepers also practice migratory apiculture, relocating hives to other provinces during different floral seasons. Within the Project AoI, seasonal peaks may see thousands of hives positioned around villages such as Çukurköy, Sakarkaya, and Konak.

Given the proximity of turbine locations and access roads to known forest and rural areas used for beekeeping, construction activities may pose temporary risks to apiary operations. These include dust generation, noise and vibration from machinery, and limited access to traditional hive placement areas.

To mitigate these potential impacts and support beekeeping livelihoods, the Project will implement the following measures:

- **Hive Relocation Assistance:** If construction activities are found to be too close to active beehive areas, the Project will engage with affected beekeepers to relocate hives to safe and ecologically suitable sites. This includes:
 - Identifying alternative forest-edge or rural plots with sufficient nectar/pollen sources and water availability; For the purposes of LRP implementation, hives located directly within the construction footprint (up to 100 m) will be eligible for relocation assistance, while hives situated within approximately 500 m may also be considered depending on species sensitivity and site-specific conditions, based on field verification at the start of construction.
 - Providing transportation for hives and equipment;
 - Scheduling relocations outside of peak nectar flow or colony development periods, where feasible, to minimize stress on bee populations.
- **Protective Measures for Nearby Hives:** In areas where relocation is not necessary but proximity to works may still cause disturbance, the Project will offer in-situ protection such as wind barriers, dust screens, and coordination of noisy activities (e.g. blasting, drilling) outside of peak foraging hours.
- **Compensation for Production Losses:** Should beekeepers experience confirmed declines in honey production or loss of hive productivity due to Project construction

(e.g. due to excessive dust deposition, stress-related hive abandonment, or reduced forage access), they will be compensated. Compensation will be based on:

- Baseline production levels (kg of honey per hive, drawn from field surveys or beekeeper records);
- Local market prices for pine honey or related products;
- Verification by agricultural experts or the District Directorate of Agriculture, in coordination with the Project's CLO and grievance mechanism.

- **Beekeeping Training and Technical Support:** The Project will collaborate with local agricultural institutions to deliver targeted capacity-building sessions for beekeepers.

These may include:

- Managing hives under environmental stress (e.g. during relocation or dust events);
- Integrated pest and disease management (particularly Varroa mite and foulbrood control);
- Diversification strategies, such as pollen harvesting, wax processing, or queen rearing techniques to enhance income.

All interactions with beekeepers—including relocation planning, compensation assessment, and training delivery—will be coordinated by the Project's Community Liaison Officer and Environmental & Social (E&S) team. Beekeepers will be encouraged to report concerns early through the Project's grievance channels to enable timely support.

TABLE 0-6 ANIMAL GRAZING AND BEEKEEPING SUPPORT MEASURES

LRP Measure	Animal Grazing Support Measures								Proposed outcomes: Ensure herders and beekeepers avoid losses and maintain their livelihoods during construction-related disruptions. Maintain hive health during stress by diversifying beekeeping products or techniques.											
	Beekeeping Support Measures																			
Links to Livelihood Activities:	<ul style="list-style-type: none">Generates income and jobs through value-added processing and improved techniques.Strengthens food security and resilience, enabling PAHs to continue preferred agricultural livelihoods despite land and output constraints.																			
Required Partnerships:	<ul style="list-style-type: none">Suppliers for Agricultural Products and Equipment, Training Organizers/Implementers, National Land Agency or Owners of Alternative Lands																			
Proposed Timelines:	2025								2026								2027			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4								
Identification of Suppliers for Livestock Feed and Transport Services (for Relocation)																				
Identification of Impacted PAPs and Mapping of Assets (e.g. Beehives)																				
Identification of Alternative Grazing Lands																				
Development Written Agreements with Suppliers and PAPs																				
PAP Sign-Off																				
Provision of Fodder and Animal Feed																				
Beehive Relocation																				
Disruption Compensation (if needed)																				
Consultation and Agreement with relevant ministries/organizations on training provisions																				
Consult PAP on planned technical training program for beekeepers																				
PAP Sign-Up for Beekeeper Training Program																				
Beekeeper Training Implementation																				
Provision of support equipment (if needed)																				
Monitoring and Evaluation.																				
Budgetary Considerations:	<ul style="list-style-type: none">Enerjisa Üretim will be required to engage with suppliers and training authorities to best understand the input costs and professional fees associated with their services.																			

8.1.4. TRAINING AND CAPACITY-BUILDING

Community consultations and socio-economic baseline surveys in the FALP Project Area of Influence revealed interest in improving agricultural productivity and exploring alternative livelihood options—particularly among young people and women, many of whom are increasingly disengaged from traditional, labor-intensive rural work. This feedback has informed the Project's commitment to provide targeted training and capacity-building programs as part of the Livelihood Restoration Plan (LRP). Planned training modules will focus on areas of high relevance to the local context, including:

- **Improved Olive Cultivation Practices:** Techniques such as appropriate pruning, pest and disease management, soil improvement, and efficient irrigation for olive groves will be delivered. Given the dominance of olive production in FALP villages and its cultural and economic importance, even modest improvements in yields or oil quality can translate into meaningful income gains.
- **Small-Scale Livestock Rearing Techniques:** Practical trainings will be offered to improve cattle and goat herd productivity through better feed use, seasonal grazing strategies, basic animal health, and cost-effective veterinary care—especially important for semi-subsistence herders coping with rising input prices and limited grazing.
- **Beekeeping (Apiculture) and Value Addition:** For existing and aspiring beekeepers, sessions will cover hive management, disease control, honey quality, and diversification into pollen, wax, or propolis production. With Muğla's prominence in pine honey and the Project area's continued apicultural activity, these skills support an essential supplementary income stream.
- **Agricultural Marketing and Cooperative Development:** Topics may include local branding, direct-to-market strategies (e.g. village-level olive oil or honey branding), digital marketing literacy, and basic accounting. The Project will encourage cooperative strengthening or establishment to improve collective bargaining and access to regional markets.

Trainings will be delivered in coordination with:

- The Muğla Provincial Directorate of Agriculture and Forestry,
- Local agriculture extension officers, and
- Where relevant, NGOs or vocational consultants with experience in rural livelihoods.

Sessions will be held post-harvest or during off-peak agricultural periods, and at locations accessible to all participating villages. Demonstration-based, hands-on formats will be prioritized to ensure retention and applicability of new skills. Priority enrollment will be offered to:

- PAPs from vulnerable households defined in the FALP AoI,
- Individuals whose livelihoods were directly impacted by land acquisition, grazing loss, or crop disruption, and
- Youth and women who show interest in transitioning into or expanding livelihood activities (e.g. starting with a few hives or small backyard farming).

TABLE 0-7 TRAINING AND CAPACITY BUILDING

LRP Measure:	Training and Capacity Building								Proposed outcomes: Increased efficiency and resilience in farming through improved practices and business conduct.															
Links to Livelihood Activities:	<ul style="list-style-type: none">Strengthens food security and resilience, enabling PAPs to continue and ideally improve preferred agricultural livelihoods through relevant training.																							
Required Partnerships:	<ul style="list-style-type: none">Suppliers for Relevant Trainings																							
Proposed Timelines:	2025								2026								2027							
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4								
Identification of Relevant Trainings																								
Consultation with PAPs on planned training programs																								
Identification of Training Developers/Implementers																								
Training Roll-Out																								
PAH Sign-Up for Training Programs																								
Training Implementation																								
Provision of supporting equipment (as needed)																								
Monitoring																								
Budgetary Considerations:	<ul style="list-style-type: none">Enerjisa Üretim will be required to engage with suppliers and training authorities to best understand the input costs and professional fees associated with their services.																							

8.1.5. OTHER SUPPORT MEASURES

SUPPORT FOR INFORMAL LAND USERS

In many rural areas of the FALP Project Area of Influence, residents depend on lands they do not formally own or have title to.

The LRP explicitly recognizes and includes informal land users to ensure that lack of legal ownership does not result in exclusion from compensation or livelihood support.

Types of Informal Use Observed in FALP Villages:

- Grazing animals on village pastures, forest edges, or treasury land;
- Cultivating small plots or orchards passed down through family but not legally titled;
- Seasonal beekeeping on forest land without formal permission;
- Use of forest areas for collecting mushrooms, pinecones, herbs, or firewood;
- Shared use of olive groves within extended families without notarized agreements.

Eligibility and Verification:

- To be eligible for support under the LRP, informal land use must be:
- Genuine (i.e., demonstrably long-standing and active);
- Critical to the household's livelihood or food security;
- Verified through community-based validation mechanisms, such as confirmation from the local mukhtar, neighbors, or other recognized community leaders.

The Project will also use field-based assessments (e.g. site visits, livestock counts, or honey production history) to evaluate the significance of the activity.

Forms of Support Available:

- Depending on the nature and severity of livelihood disruption, eligible informal users may receive:
 - Transitional Livelihood Support (TLS) in cash or kind if their grazing or foraging access is significantly affected (e.g. a shepherd who used forest margins for winter grazing);
 - In-kind support such as fodder for informal livestock keepers, or hive materials and relocation assistance for beekeepers;
 - Priority inclusion in education or cooperative development programs, particularly for informal users without secondary income sources.

All decisions regarding support to informal users will be documented and tracked through the LRP monitoring system, and grievances related to eligibility or assistance can be submitted via the Project's grievance mechanism for fair resolution.

TRANSITIONAL LIVELIHOOD SUPPORT (TLS)

Transitional Livelihood Support (TLS) is a key financial assistance mechanism within the FALP Livelihood Restoration Plan. It provides temporary support—either in cash or in-kind form—to Project-Affected Persons (PAPs) whose livelihoods are significantly disrupted due to loss of land, productive resources, or access to natural assets. TLS ensures that affected households

can maintain a minimum level of livelihood security while transitioning toward longer-term restoration.

TLS will be provided to PAPs who meet one or more of the following triggers:

- **Significant Loss of Productive Land**
Households (formal or informal users) who lose their total productive land area—including olive groves, cultivated fields, or grazing parcels—due to Project land acquisition, construction footprint, or long-term access restrictions.
- **Loss of Access to Critical Natural Resources**
Individuals or households whose livelihoods depend on common lands—such as village pastures, forest margins used for grazing or firewood, or forest-based foraging (e.g. mushrooms, pinecones)—and whose access to these resources is restricted by Project works, even if they do not own the land.
- **Disruption to Apiculture or Seasonal Livestock Use**
Beekeepers or herders who are temporarily or permanently unable to place hives or graze livestock in traditional areas due to turbine zones, access roads, or construction-related limitations.

Based on preliminary land acquisition data and March 2025 fieldwork:

- Several households in Kırcağız, Saraçlar, and Çukurköy are likely to lose substantial parts of their olive groves;
- A number of informal forest users and shepherds have reported access limitations to grazing areas and firewood collection zones;
- Beekeepers operating near turbine clusters or access corridors may experience yield losses and hive relocation needs.
- **Form and Duration of Support:** The support is generally designed to cover one agricultural cycle of lost income. In practice, this might mean a monthly cash transfer to the household for a defined period (e.g., 3 to 6 months) to substitute for lost crop income. Alternatively, it could be delivered as agricultural inputs – for example, providing a package of seeds, fertilizer, or livestock feed that helps the household sustain production on their remaining land. The choice of cash vs. in-kind, and the exact duration, will be tailored to the household's primary livelihood and seasonal calendar. Typically, support will span a period sufficient for the PAP to re-establish their livelihood (for example, until the next harvest or grazing season when they can start recovering).
- **Eligibility Thresholds and Duration:**
TLS is provided to those whose main livelihood is agriculture, based on the proportion of land loss:
 - 3-month TLS for 20–40% impact rate
 - 4-month TLS for 40–60% impact rate
 - 5-month TLS for 60–80% impact rate
 - 6-month TLS for 80–100% impact rate

Households that lose more than 70% of their land are considered severely impacted and, in practical terms, may face conditions similar to landlessness. For such cases, enhanced support measures will be considered, including the maximum duration of TLS (6 months) and priority access to complementary livelihood restoration programs. Asset valuation is conducted based on a scoring system developed by Enerjisa presented below.

Impact Category

Affected Percentage of Total Land	Impact Score	Expropriated Land Area (m ²)	Impact Score	Impact on Multiple Land Parcels	Impact Score	Remaining Land Condition	Impact Score	Actual Land Use	Impact Score	Type of Structure Affected	Impact Score	Impact on Main Livelihood Source	Impact Score	Other Vulnerabilities / Sensitivities	Impact Score
20–30%	10	1–2,500 m ²	5	1–2 Parcels	5	Irregular shape, small area, access issues	5	Vacant	0	Residential	5	Main livelihood source is the expropriated land	5	Disadvantaged Group	10
30–40%	15	2,500–5,000 m ²	10	2–3 Parcels	10			Rented	0	Business	10	Other than land-based livelihood	0		
40–50%	20	5,000–7,500 m ²	15	3–4 Parcels	15			Field	5						
50–60%	25	7,500–10,000 m ²	20	4–5 Parcels	20			Garden	10						
70%+	30	10,000+ m ²	25	5+ Parcels	25			Plot (zone d land)	15						

Score Range	Support Amount
5–14 points	1 Minimum Wage
15–24 points	2 Minimum Wages
25–34 points	3 Minimum Wages
35–44 points	4 Minimum Wages
45–54 points	5 Minimum Wages
55+ points	6 Minimum Wages

While affected structures and assets are reflected within the scoring system, it is important to note that the system is designed solely to determine transitional allowances related to livelihood activities. It does not replace or serve as a basis for compensation for impacted assets and structures. Compensation for such losses will continue to be provided in accordance with government compensation rates, valuation processes, and any subsequent top-up payments that may be applied in addition to the transitional allowances.

A final determination of TLS eligibility will be made once all land acquisition, easement agreements, and user verification are completed, including community validation for informal users.

Support duration will align with the seasonal calendar and be long enough to allow PAPs to recover—e.g. until the next olive harvest, grazing cycle, or honey season.

At the time of this LRP, the exact number of TLS recipients is still being finalized. The Project commits to:

- Updating the final list of eligible households once land acquisition and user data is complete;
- Ensuring informal users are not excluded based on lack of legal title, in accordance with IFC PS5 and EBRD ESR5;
- Monitoring the adequacy of TLS support and adjusting its form or duration based on community feedback or unexpected disruptions.

TLS program aims to prevent a decline in livelihood security and enable PAPs to resume productive activities without entering deeper economic vulnerability.

VULNERABILITY SUPPORT

In line with IFC PS5/EBRD ESR5, vulnerable PAPs will receive additional tailored support so that they are not left worse off by the project. Vulnerable households identified during the baseline or through ongoing monitoring will be prioritized for the following measures:

- **Faster processing of entitlements:** Their compensation payments and support measures will be processed as a priority to avoid delays for those who may be most in need.
- **Enhanced transitional livelihood support:** They may receive a larger or longer duration of transitional support (or additional cash/in-kind assistance) recognizing that they have fewer buffers to cope with loss.
- **Tailored in-kind or home-based assistance:** Support will primarily focus on ensuring that directly affected PAPs can access essential project-related services, such as grievance mechanisms, information on expropriation, and other basic rights. Additional household-level assistance (e.g., provision of firewood, fuel, or small livelihood inputs) will only be considered if the Project directly restricts access to these resources and creates a verified additional burden on affected households (for example, forest-dependent households losing access to fuelwood). In such cases, support will be delivered based on documented evidence confirming the impact. This approach ensures equity across the community while addressing specific needs that arise solely due to Project impacts

- **Inclusion in community development programs:** Where possible, vulnerable PAPs will be linked with any additional community development or income restoration programs (beyond the LRP) that the Project or government may offer, to supplement their livelihood.

By giving special attention to vulnerable groups, the LRP ensures that those least able to adapt are equally able to restore their livelihoods and do not fall through the cracks.

Table 0-8 below presents an overview of vulnerable group support measures.

TABLE 0-8 VULNERABLE GROUP ENGAGEMENTS FOR LRP SUPPORTS

Vulnerable Group	Engagement / Access Measures
Female-headed households	Gender-sensitive outreach; small-group meetings or home visits
Elderly-headed households (65+)	Visual/verbal info; mobility-sensitive home consultations
Persons with disabilities	One-on-one support; referral to health or welfare services
Illiterate / low-literacy adults	Use of symbols/pictures; briefings via muhtars/CLOs

TABLE 0-9 VULNERABLE GROUPS – ENTITLEMENTS UNDER LRP (LIVELIHOOD RESTORATION MEASURES)

Vulnerable Group	LRP Entitlement Measures
Female-headed households	Priority access to compensation; in-kind food or agri support
Elderly households	Customized TLS based on livelihood season (e.g. olive cycle)
Households on social aid	Supplemental support package (poultry, firewood, inputs)
Persons with disabilities	Adjusted documentation support; assisted delivery mechanisms
Informal users	Verified inclusion in compensation and in-kind schemes
Unemployed youth / low-income HHs	Early inclusion in skills training and contractor job referrals

To ensure inclusive and equitable engagement throughout the project, a Vulnerability Focal Point will be designated within the Community Liaison Team. This individual will be responsible for coordinating targeted support to vulnerable groups and maintaining feedback loops that ensure their concerns and needs are properly addressed.

Dedicated stakeholder engagement activities will be organized specifically for vulnerable groups, designed to foster trust and ensure accessibility, including measures that accommodate physical, social, and informational barriers.

The Entitlement Matrix (refer to Section 7.3.) will clearly outline which groups are eligible for specific components of the LRP, ensuring transparency and fairness in assistance provision. Within the scope of the Project, the existing Grievance Mechanism (Please refer to Stakeholder Engagement Plan) will be adapted to incorporate confidential and simplified pathways tailored to the unique needs of vulnerable individuals—particularly those facing low literacy, limited mobility, or concerns related to social stigma.

A vulnerability tracking system will be maintained throughout construction and the LRP implementation period, ensuring that new cases of vulnerability are identified and addressed. Monitoring data will be disaggregated by gender, age, and vulnerability category to assess effectiveness and identify unmet needs. Mid-term reviews will specifically evaluate whether vulnerable groups have received appropriate support and achieved restoration of livelihood standards.

TABLE 0-10 OTHER SUPPORT MEASURES

LRP Measure	Other Support Measures												Proposed outcomes: To ensure that affected individuals—especially the most vulnerable, can maintain their livelihoods, adapt to temporary disruptions, and transition smoothly through project-related changes with targeted assistance and compensation.											
Links to Livelihood Activities:	<ul style="list-style-type: none"> Generates income and jobs through value-added processing, small business opportunities, and agri-employment. Strengthens food security and resilience, enabling PAHs to continue preferred agricultural livelihoods despite land and output constraints. 																							
Required Partnerships:	<ul style="list-style-type: none"> CLO's , Mukhtars, Relevant local NGO's working with vulnerable groups 																							
Proposed Timelines:	2025				2026				2027															
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4												
Identification of PAPs eligible for other support measures																								
Home Visits for engagement with identified PAPs and verification of eligibility																								
Allocation of Funds for TLS and Vulnerability Support																								
Provision of Additional In-kind assistance																								
Transfer of Funds																								
Priority for Trainings and Employment-based LRP measures																								
Monitoring and Evaluation																								
Budgetary Considerations:	<ul style="list-style-type: none"> Enerjisa Üretim will be required to engage with relevant local actors to identify all impacted PAPs eligible for other support measures and allocate respective services to them and M understand the input costs and professional fees associated with those measures. 																							

8.2. LRP IMPLEMENTATION SCHEDULE

The LRP will be implemented in the following phases:

Pre-Construction Phase

- Final PAP verification and updating of the eligibility database
- Disclosure of entitlements and LRP brochure to all PAPs
- Disbursement of cash compensation and initiation of TLS
- Coordination meetings with third-party stakeholders (e.g., İŞKUR, Directorate of Agriculture)

Construction Phase

- Weekly monitoring of access and damage to crops, fences, and infrastructure
- Implementation of in-kind support for livestock and beekeeping PAPs
- Onboarding of local workers through employment facilitation partnerships
- Launch of initial training sessions and registration drives

Post-Construction Phase

- Finalize any pending compensation or damage claims
- Continued Grievance Redress
- Continued support and monitoring for vulnerable groups through targeted visits
- Completion audit and satisfaction survey to measure LRP effectiveness

TABLE 0-11 LRP IMPLEMENTATION TIMELINE

Proposed Timelines:	2025				2026				2027			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Mobilization												
Final PAP Verification (incl. Vulnerable Groups)												
LRP Disclosure												
Relocation of Assets												
Construction												
Operation												
Disbursement of Compensation Payments												
Local Employment												
In-kind Support Disbursements												
Training Roll-Out and Implementation												
Monitoring and Evaluation												
Grievance Redress												
LRP Completion Audit												

9. ROLES AND RESPONSIBILITIES

This section outlines the roles and responsibilities of key project personnel and teams in relation to the effective and timely implementation of this LRP.

9.1. KEY PROJECT STAFF

Table 0-12 below presents the key Project staff and their roles and responsibilities in the LRP development and implementation.

TABLE 0-12 ROLES AND RESPONSIBILITIES

ESMS Team Member / Task Force	E&S Related Roles and Responsibilities
FALP WPP Project Manager / Construction Manager	<ul style="list-style-type: none"> • Provide strategic oversight and general project management for LRP implementation. • Review and approve the LRP and any necessary updates.- Approve entitlement measures proposed under the LRP. • Ensure that sufficient resources are allocated for LRP delivery. • Periodically review LRP implementation progress reports.
Project Deputy Manager / Community Liason Officer (CLO) also acting as the GBVH Focal Point	<ul style="list-style-type: none"> • Maintain grievance database for land-related complaints.- • Collect and process field complaints. • Ensure timely resolution in collaboration with technical managers. • Report unresolved issues related to Employer to supervisors. • Prepare monthly LRP-related grievance reports. • Monitor expropriation, legal processes, and access status. • Ensure and acquisition complaints are resolved per SEP. • Provide technical input for LRP cost adjustments. • Support local stakeholder engagement and LRP communication. • Coordinate grievance resolution at site level. • Ensure timely escalation of unresolved issues.
Project Land Acquisition Team	<ul style="list-style-type: none"> • Team is comprised of: Corporate-level Land Acquisition and Expropriation Mentor; Urban & Regional Planning Solution Partner; and Land Acquisition Expert • Public information meeting with regards to land acquisition process for the Project • Compensation payments for land • Close collaboration with Project CLO's
RAP/LRP Implementation Task Force	<ul style="list-style-type: none"> • Led by RAP specialist • Ultimately responsible for LRP implementation • Ensure funding for Contractor-led LRP activities. • Align financial flows with LRP timeline and delivery mechanisms.

ESMS Team Member / Task Force	E&S Related Roles and Responsibilities
TEİAŞ	<ul style="list-style-type: none"> Carry out land acquisition and expropriation procedures in accordance with national legislation. Coordinate with relevant public institutions (cadastre, municipality, forest authority, etc.) for land access. Notify and communicate with legally registered landowners and rights holders. Manage compensation payments for expropriated land and registered assets.
Contractors and Subcontractors	<ul style="list-style-type: none"> Record and forward all grievances received, including verbal complaints. Respond to issues in alignment with Contractor procedures and SEP requirements.

All personnel and units involved in LRP delivery are required to operate under the principles of transparency, accountability, and stakeholder responsiveness, and to ensure full alignment with the Project's grievance mechanism and stakeholder engagement strategy.

9.2. OTHER ACTORS

Effective LRP implementation requires collaboration with multiple stakeholders, including:

- **Public institutions:** State Hydraulic Works (DSİ), Land Registry Office, Provincial Directorate of Agriculture and Forestry, Social Services
- **Local actors:** Mukhtars, Chamber of Agriculture, Village Cooperatives

These actors will assist in verification, training, asset valuation, and grievance handling.

10. LRP STAKEHOLDER ENGAGEMENT

Effective stakeholder engagement is essential to the success of the LRP. The Project is committed to transparent, inclusive, and continuous engagement with all Project-Affected Persons, particularly those whose livelihoods may be impacted by land acquisition or restricted access to land and resources.

This engagement framework ensures that all PAPs are informed of their rights, entitlements, responsibilities, and available support mechanisms, including the grievance process for raising concerns related to LRP implementation.

10.1. LRP DISCLOSURE

Upon finalization and approval of the LRP, a non-technical summary of the document will be prepared and shared with affected communities in Turkish, using appropriate, locally accessible formats. The disclosure methods will include:

- Distribution of printed brochures and posters in affected settlements
- Verbal presentations during community information meetings by the Project CLO
- Special disclosure meetings for vulnerable groups
- Uploading the LRP to the Project website

These materials will explain:

- The types of impacts covered under the LRP
- LRP Process and Programs
- Eligibility criteria and entitlements
- Cut-off date for eligibility
- All eligible PAPs will be proactively identified and registered for relevant support measures based on the entitlement matrix. No formal application will be required; support will be delivered directly according to verified eligibility records.
- Grievance mechanism and contact points
- Project timelines

10.2. STAKEHOLDER CONSULTATION ACTIVITIES

Following approval of the LRP:

- Community meetings will be held in each affected neighborhood to disclose the LRP in an accessible format.
- The Project's Community Liaison Officers (CLOs) will lead these consultations and remain available throughout the LRP implementation period.
- CLOs will ensure that vulnerable groups (e.g., elderly, women-headed households, informal users) are specifically reached through direct visits or separate small-group sessions.
- Additional LRP consultations will be triggered in case of significant changes to the entitlement framework or newly affected areas due to future expropriations or construction realignments.

Engagement with Regards to Inheritance-Related Compensation Delays

During the compensation process for a similar project, a limited number of cases were identified where heirs experienced delays in receiving their compensation due to the legal procedures required for inheritance declaration. These delays primarily resulted from the time needed to obtain formal documentation confirming legal entitlement to the assets and compensation payments.

To resolve this issue, the Project's legal team supported affected households by facilitating the preparation and submission of inheritance declarations. These were subsequently delivered to the rightful heirs through the Community Liaison Officers (CLOs). In addition, clear instructions, accompanied by photographs illustrating the steps to obtain payments from the court, were posted at the village coffeehouse to ensure transparency and broad access to information. As a result of these measures, the heirs were able to complete their applications and receive their compensation payments.

The project commits to take the same approach as described above, if similar inheritance related delays are encountered for the FALP Project. Measures will be sufficiently documented and monitored.

10.3. GRIEVANCE MECHANISM

The Project Grievance Mechanism (Please refer to SEP), originally established under the Stakeholder Engagement Plan, will also serve as a tool for receiving, registering, and resolving requests and complaints related to livelihood restoration.

KEY FEATURES OF THE GRIEVANCE MECHANISM IN LRP CONTEXT

The Project's Grievance Mechanism (Please refer to SEP) will be an accessible and confidential tool for receiving and resolving complaints specifically related to the Livelihood Restoration Programme (LRP). Importantly, the GM is not intended to be a channel for initiating or requesting livelihood support measures or for validating standard LRP processes. All eligible Project-Affected Persons (PAPs) are automatically identified and registered based on the entitlement matrix, and the implementation of support measures does not require individual requests or applications via the GM. Likewise, the GM will not be used as a standard tool to confirm acceptance of compensation packages, asset valuations, or other entitlements. Instead, all asset valuation reports and livelihood-related verification forms will be jointly reviewed and signed off by the respective PAPs, community representatives (e.g. Mukhtars), and, where appropriate, an independent third party such as a qualified NGO or monitoring body. The Project team will proactively engage with PAPs during site visits and consultation activities to obtain formal consent and feedback. Feedback loops for such core LRP processes will be built into field implementation and documentation procedures, ensuring that PAPs do not need to rely on the GM to raise questions or express approval.

The GM's role in the context of the LRP will be clearly limited to addressing disputes or complaints, including the following:

- Acceptance and confidential processing of grievances—whether named or anonymous—submitted through established GM channels (verbal, written, or digital).
- Registration and resolution of complaints related to compensation disagreements, asset valuation disputes, transitional or in-kind support concerns, or exclusion from training and employment programmes.

- Commitment to resolve grievances within the agreed timeframes (e.g. within 30 working days), in accordance with the Project's grievance procedure.
- Written notification of grievance outcomes to complainants, with escalation procedures in place for unresolved cases, including review by a grievance committee or referral to an external mediator, if necessary.

COORDINATION WITH RELEVANT AUTHORITIES

The CLO team will liaise with Provincial and District Governorates, Forestry Directorates, and Land Registry Offices to ensure alignment in addressing land-related grievances. In the case of future expropriation, the Project will disclose the updated cut-off date and entitlements clearly, and any new grievances will be managed through the same GM system.

ONGOING STAKEHOLDER ENGAGEMENT

The Project commits to continuous engagement with affected households throughout the LRP implementation, including:

- Follow-up visits for monitoring support delivery
- Adjustments to LRP measures based on community feedback
- Transparent reporting on LRP progress at village level

All community engagement activities, questions raised, and corrective actions taken will be documented and included in quarterly LRP implementation reports submitted to IFC and other stakeholders.

STAKEHOLDER ENGAGEMENT IN LRP IMPLEMENTATION

Effective stakeholder engagement is essential to the success of the LRP. Throughout implementation, the Project is committed to transparent, inclusive, and continuous engagement with all PAPs – particularly those whose livelihoods are impacted by land acquisition or restricted access to resources. The engagement strategy for the LRP ensures that PAPs are well informed of their rights, entitlements, responsibilities, and the available support mechanisms. It also ensures they know how to voice concerns or complaints via the grievance process.

INFORMATION DISCLOSURE ON THE LRP

Once the LRP is finalized, the LRP will be shared with all affected communities in user-friendly formats. The disclosure methods will include:

- Distribution of printed **brochures or information booklets** to households in each affected settlement. These brochures will concisely explain the LRP provisions and contact information. Posters may also be placed in prominent village locations summarizing key points.
- **Community meetings:** In each affected settlement in the FALP AoI meetings will be held. In these meetings, the Project's CLOs (and other social team members) will present the LRP summary verbally, use visual aids or presentations to explain complex concepts, and answer questions from PAPs. Multiple meetings will be held as needed to reach everyone, including separate sessions for smaller hamlets if required.
- **Special disclosure meetings for vulnerable groups:** recognizing that some individuals (e.g. illiterate elderly, women who cannot easily attend public meetings, people with

disabilities) may not get the full message in large meetings, the Project will organize tailored sessions. For example, a women-focused meeting facilitated by female staff, or home visits to disabled persons to explain the LRP one-on-one.

- Uploading the Turkish LRP document to the **Project's website** for wider accessibility. This allows any stakeholder with internet access to review the plan.
- Keeping printed **information sheets at local mukhtar offices and community centers** (such as the village coffee house, mukhtar office or agricultural cooperative). This way, community members can refer back to LRP information at any time. Mukhtars will be given extra copies and briefed so they can help disseminate information as well.

The information shared with PAPs will clearly explain: the types of impacts covered by the LRP (what losses are eligible), the overall LRP process and various programs available, the detailed eligibility criteria and entitlements (who gets what compensation or support), the cut-off date and its significance, the application procedures for assistance (how, when, and where PAPs should come forward to claim support or compensation), the grievance mechanism (how to lodge complaints or ask questions, including contact persons), and the Project timeline for LRP implementation (so people know when to expect certain activities). By communicating all these points, PAPs will have a good understanding of what the project will do and what they need to do to receive their due benefits.

STAKEHOLDER CONSULTATION ACTIVITIES

In addition to one-way information disclosure, the LRP implementation will include ongoing consultation with PAPs:

- **Community Consultation Meetings Post-Approval:** Shortly after the LRP is approved, the Project will hold community consultations in each affected settlement. In these meetings, beyond just presenting information, the team will actively solicit PAP feedback. Community members can voice any concerns about the LRP, suggest improvements, or seek clarifications. All questions will be answered on the spot if possible, or taken note of for follow-up. The CLOs, supported by the Social Affairs Manager, will ensure the format is open and participatory. These consultations will be documented (attendance, issues raised, responses given).
- **GLAC Disclosure Meetings:** Once RAP/LRP identification and entitlements are finalized, the Project will organize Grievance, Livelihood and Compensation (GLAC) disclosure meetings in the affected communities. These meetings will present PAP entitlements, compensation arrangements, and grievance procedures in a clear and accessible manner. Summaries of the LRP will feed into the GLAC documentation, which will then be disclosed to PAPs.
- The Project's **Community Liaison Officers (CLOs)** will maintain an ongoing presence in the communities throughout the life of the LRP. They will visit the villages regularly, be available at designated times to answer questions, and will provide updates as the project progresses. This ongoing engagement is especially important for implementing programs like vocational training or for updating people about construction schedules that might affect them.
- **Outreach to Vulnerable PAPs:** As noted, separate or additional consultations will be held to ensure vulnerable individuals are consulted. For example, CLOs may do **door-to-door**

visits for particularly vulnerable households to explain the LRP or check on their situation. Small focus-group discussions might be held with groups like women in a certain hamlet, or sharecroppers, if they have distinct concerns. The project will document these discussions and take into account the input when adjusting implementation.

If there are significant changes to the LRP during implementation – for instance, if the entitlement framework is expanded or if new areas end up being affected due to design changes – the Project will re-disclose and re-consult on those changes. New PAPs (if any) will be informed of their entitlements, and existing PAPs will be told of any updates that concern them. This adaptive consultation ensures transparency even if the project scope evolves.

DISCLOSURE AND PUBLICATION

Information about how to submit grievances (contact persons, phone numbers, email, physical offices) will be posted in each village and explained during the LRP disclosure meetings. The LRP brochures will also contain a section on the grievance mechanism. Importantly, the Project's CLOs will actively assist PAPs in writing and submitting grievances, especially those who are not literate or who need help articulating the issue. This hands-on assistance ensures everyone can access the GM easily.

Additionally, the CLO team will coordinate with relevant government authorities to resolve certain grievances. For example, if a grievance relates to a government compensation amount being too low, the CLO or Social Affairs Manager will liaise with the District Governorate or Land Registry to obtain information or advocate on behalf of the PAP where appropriate. The Project recognizes that some land acquisition issues may need collaboration between the Project and state authorities, so a cooperative approach is in place.

If future expropriations or land acquisitions occur beyond the current ones, the Project will announce a new cut-off date for those and integrate those PAPs into the same GM system. New grievances arising from future land takings will be handled with the same rigor and process.

ONGOING STAKEHOLDER ENGAGEMENT

Engagement does not end once compensation is paid. The Project commits to continuous engagement with PAPs throughout LRP implementation. This includes:

- **Follow-up visits:** After delivering support (like after a training or after a compensation payout), the LRP team will visit PAPs to check on their situation. For example, verifying that a livelihood support measure (like given beehives or livestock feed) is yielding the intended benefit, or that a household has managed to re-establish an income source. These follow-ups help identify if any PAP is struggling and might need additional help.
- **Adjustments based on feedback:** The Project will treat the LRP as a living program – if PAPs collectively voice that something isn't working (say the variety of fodder provided is not preferred by their animals, or the timing of trainings conflicts with farming season), the Project will adjust the approach accordingly. This adaptive management ensures the LRP remains effective and culturally appropriate.
- **Transparent reporting:** The Project will keep communities informed of LRP progress. This could be through village bulletins or meetings where they share how many people have been compensated, how many attended training, what upcoming activities are

planned, etc. Such transparency builds trust and also allows community members to see overall how the commitments are being fulfilled.

REPORTING AND DOCUMENTATION

All community engagement activities will be documented. The project's social team will record the dates of meetings, list of participants, topics discussed, and any grievances or requests raised. Likewise, any corrective measures taken as a result (for example, adding an extra water tanker to reduce dust after community complaints) will be recorded. This documentation will be compiled into quarterly LRP implementation reports which the Project will submit to lenders like IFC/EBRD and share with relevant stakeholders. These reports allow external stakeholders to monitor whether the Project is doing what it promised and if it's responding to issues promptly.

INSTITUTIONAL COORDINATION

Successful livelihood restoration also depends on collaboration with various institutions. The Project will work in partnership with:

- **Public institutions** – e.g., TEİAŞ (Turkish Electricity Transmission Corporation) for coordination of grid connection and related infrastructure (ETL), DSİ (State Hydraulic Works) which is handling expropriation, the Land Registry Directorate for land title matters, the Provincial Agriculture and Forestry Directorate (İl Tarım Müdürlüğü) for agricultural support and training, and the Social Services (Sosyal Hizmetler) agencies for coordinating assistance to vulnerable families. Leveraging these agencies' expertise and programs can enhance LRP measures (for instance, inviting government agronomists to trainings or enrolling vulnerable PAPs in state aid programs)
- **Local organizations** – e.g., Mukhtars of each affected settlement, who are key liaisons and can help verify information and mobilize people for meetings; the Chamber of Agriculture and local cooperatives who can support implementation of certain measures (like organizing farmers for training, or distributing materials). These local bodies ensure community buy-in and culturally appropriate delivery of support.
- **Project-internal teams** – especially the Community Liaison Officers (CLOs), E&S staff, and construction supervisors, who will coordinate LRP activities on the ground and ensure timely communication between PAPs, contractors, and institutional partners.

The Project will establish regular communication with these actors. For example, a coordination meeting might be held monthly with the mukhtars of affected villages to discuss LRP progress and any community issues. In summary, a multi-stakeholder approach is being used to maximize the effectiveness of livelihood restoration interventions.

By actively engaging stakeholders, maintaining open communication, and providing mechanisms for feedback and redress, the Project will foster an environment of trust and cooperation – which is crucial for the smooth implementation of the LRP and ultimately for the restoration of livelihoods of those affected.

11. LRP BUDGET

The successful implementation of the LRP for the Project will require a well-defined and adequately resourced budget. The budget will reflect the scope, geographic spread, and livelihood typologies identified through detailed fieldwork and consultations conducted in March 2025. It will cover both fixed compensation obligations and flexible support mechanisms tailored to seasonal and informal livelihood practices.

11.1. KEY BUDGET COMPONENTS

Key budget components include the following:

- Cash Compensation for Private Land Loss
 - Compensation for defined affected privately owned parcels (following the finalization of the land acquisition lists of the ETL/ access roads).
 - Full replacement value based on independent valuation.
 - Disbursed via official channels in coordination with the Land Registry Directorate and the Project Owner.
- Compensation for Productive Trees and Crops
 - Valuation of olive trees and cultivated crops.
 - Includes loss due to dust, access, or physical disturbance.
 - Based on formulas approved by the Ministry of Agriculture and Forestry (MoAF).
- Unregistered Asset Compensation
 - Covers informal structures such as fences, irrigation systems, beehives.
 - Requires verification via GPS-tagged photos, field validation, and community statements.
- Informal User Compensation and TLS
 - Provision of transitional livelihood support for informal users of treasury or forest lands.
 - Includes small ruminant grazing and hive relocation assistance.
- Fodder and Animal Feed Support
 - Seasonal in-kind provision (hay, concentrate feed) for small livestock
 - Transport support for herders.
 - Contingency budget for alternate grazing arrangements.
- Construction-Related Damage Repair and Compensation
 - Includes crop damage, asset breakage, and soil degradation.
 - Contractor-financed under supervision and damage verification.
- Preventive costs for dust control (road watering), fencing, and signposting.
- Beekeeper Support Measures
 - Relocation of hives, new site identification.
 - Training for hive health and diversification.
 - Compensation for disruption during construction.

- Training and Capacity Building
 - Agricultural extension services for youth and vulnerable groups.
 - Topics include olive pruning, livestock nutrition, beekeeping, and marketing.
 - Delivered in collaboration with Provincial Directorate of Agriculture and cooperatives.
- Vulnerability Assistance Package
 - Prioritized processing and tailored in-kind support (fuelwood, poultry kits).
 - Extra TLS for female-headed and elderly households.
- Grievance Mechanism Operationalization
 - Dedicated resources for complaint intake, verification, resolution, and reporting.
 - Includes data management and communication costs.
- Monitoring and Adaptive Implementation
 - Continuous tracking of grazing access, crop yield, and seasonal patterns.
 - Stakeholder re-consultation and LRP updates as required.

11.2. BUDGET ALLOCATION AND MANAGEMENT

Enerjisa Üretim will ensure sufficient allocation of LRP resources within the overall ESMS budget. A dedicated LRP Implementation Budget Line will be established, managed by the Social Affairs Manager under the oversight of Senior Management. Contingency reserves will be included for unforeseen livelihood disruptions. Regular budget updates will be provided in LRP progress reports.

This comprehensive budget structure is designed to ensure that all Project-Affected Persons (PAPs)—including informal and vulnerable users—receive timely, fair, and meaningful support in restoring their livelihoods.

ESTIMATED BUDGET

The LRP budget has been calculated based on the number of eligible PAPs in each defined entitlement category and standard unit costs for their losses or supports. Each budget item corresponds to a specific category of impact identified in the entitlement matrix – for example, households experiencing significant land take (e.g. $\geq 20\%$ of their income) are allocated transitional livelihood support, PAPs losing productive trees (such as olive groves) receive compensation per tree, and those with unregistered assets or informal land use are provided lump-sum payments for their losses. These unit compensation rates (e.g. TRY per square meter of land, per fruit tree, per affected asset) are derived from current market values and Turkish valuation guidelines. The estimated quantity of units for each category (such as total land area to be acquired, number of trees affected, or number of eligible households) is based on the asset inventory and PAP census conducted for the Project. Each line item also notes the responsible party for delivery – Enerjisa Üretim for core land acquisition compensation and livelihood restoration measures, and Contractor for obligations linked to construction-phase impacts (e.g. compensation for unregistered assets or damage during works) – in line with the Project's implementation arrangements and contractual commitments. **Error! Reference source not found.** below presents the estimated LRP budget. It should be noted that the budget will be updated following further socioeconomic surveys covering the ETL.

TABLE 0-13 LRP BUDGET ESTIMATE

Budget Item	Unit Cost (TRY)	Estimated Quantity	Subtotal (TRY)
Compensation for Private Land Acquisition	1,430 TRY/m ²	TBD (following the results of the survey for the ETL route)	TBD
Transitional Livelihood Support (TLS) for Informal Users & Vulnerable Households	10,000 TRY/household	~70 households	700,000
Fodder Support for Seasonal Grazing Loss	2,500 TRY/ton	~60 tons	150,000
Compensation for Seasonal Crop/Yield Loss	2,000 TRY/tree (avg.)	~950 olive trees + minor crops	1,900,000
Compensation for Unregistered Assets	Lump-sum (≈10,000 TRY)	~100 assets (fences, irrigation, hives)	1,000,000
TLS and Relocation Support for Informal Users (Beekeepers/Grazers)	Lump-sum (5,000 TRY)	~800 hives, 20 households	4,100,000
Temporary Access/Passage Compensation	Lump-sum (10,000 TRY)	~15 households	150,000
Dust-Related Yield Compensation	10,000 TRY/plot	~15–18 plots	170,000
Vulnerability Assistance Package (TLS top-up, in-kind)	7,000 TRY/household	~110 households	770,000
Agricultural and Livelihood Trainings	15,000 TRY/session	15 sessions	225,000
Total Estimated Budget	–	–	9,165,000

Note: The above values are preliminary estimates based on market rates as of Q2 2025. These figures will be refined as necessary following detailed asset verification and ongoing consultation with affected stakeholders to ensure accuracy and adequacy prior to final budget allocation.

12. MONITORING AND EVALUATION

The monitoring and evaluation (M&E) of the LRP implementation will form a core part of the ESMS for the Project. It will ensure that the project's resettlement and livelihood restoration obligations are being fulfilled transparently, effectively, and in line with IFC PS5 and EBRD ESR5.

12.1. OBJECTIVES OF MONITORING AND EVALUATION

Key objectives in M&E for the LRP include the following:

- Track progress of LRP implementation activities
- Identify implementation challenges and propose corrective actions
- Ensure that LRP outcomes align with stated objectives
- Measure the extent to which livelihoods are restored or improved
- Facilitate adaptive management based on participatory feedback

12.2. MONITORING AND EVALUATION METHODS

M&E activities aim to ensure that the LRP is implemented effectively and delivers the intended outcomes for PAPs. These activities are designed not only to measure performance but also to provide a continuous feedback loop for adaptive management and inclusive stakeholder engagement.

A combination of qualitative and quantitative methods will be applied:

- **Desk-based Review of Expropriation Data:** Includes analysis of records from the government authority responsible for expropriation (e.g. DSİ), covering status by parcel and settlement, number of affected structures, ongoing legal cases, valuation disputes, and updated expropriation plans.
- **Quantitative Household and Mukhtar Surveys:** Designed to assess income restoration, asset recovery, and access to compensation. Survey instruments will mirror the ESIA baseline tool for comparability.
- **Qualitative Focus Group Discussions and Interviews:** Especially with vulnerable groups, women, seasonal workers, informal users, and youth to assess perceived impacts, risks, and satisfaction with support mechanisms.
- **Grievance Mechanism Review:** Regular review of feedback and grievance databases maintained by the Project CLOs and Employer to identify systemic issues and areas for improvement.
- **Participatory Monitoring Tools:** Use of photo evidence, participatory mapping, and real-time interviews with PAPs to validate impacts and support.

12.3. MONITORING COMPONENTS

The LRP monitoring system is structured around four interrelated components—process, output, outcome, and impact monitoring. Each component tracks a specific dimension of implementation performance and is linked to concrete, project-specific Key Performance Indicators (KPIs) relevant to the Project.

TABLE 0-14 PROJECT MONITORING

Monitoring Type	Focus Area	Key Monitoring Topics	Project-specific KPIs
Process Monitoring	Verifies implementation against schedule, procedures, and quality standards. Enables early detection of delays or bottlenecks.	<ul style="list-style-type: none"> Timely delivery of compensation and Transitional Livelihood Support (TLS) On-schedule distribution of livestock fodder and relocation of beehives aligned with seasonal cycles Roll-out of training and employment facilitation initiatives Timely and equitable grievance processing, documentation, and resolution Coordination with third-party stakeholders (e.g., İŞKUR, Provincial Agriculture Directorate) 	<ul style="list-style-type: none"> % of cash compensation delivered before construction start % of TLS packages distributed within 1 year of impact % of grievances resolved within 30 working days
Output Monitoring	Tracks the tangible results and quantity of support delivered to Project Affected Persons (PAPs).	<ul style="list-style-type: none"> Number of PAPs receiving each type of LRP support (compensation, TLS, training, job facilitation) Quantity of livestock fodder packages and number of beehive relocations Number of training sessions held (agricultural/vocational), disaggregated by gender Number of brochures distributed and community meetings held Number of PAPs managed to access and withdraw compensation deposited by 	<ul style="list-style-type: none"> % of livestock keepers receiving fodder support % of beekeepers supported through hive relocation Number and % of women/youth participating in training % of completion of water pond and water pipes construction (for relocated animal shelter) % of PAPs managed to access and withdraw compensation deposited by

Monitoring Type	Focus Area	Key Monitoring Topics	Project-specific KPIs
Outcome Monitoring	Assesses short- to medium-term effects of LRP on PAP livelihoods. Focuses on effectiveness of restoration efforts.	<ul style="list-style-type: none"> Degree of restoration in agriculture/livestock activities Change in household income structure (e.g., reduction in informal work/migration) Self-reported improvements in food security and resilience 	<ul style="list-style-type: none"> % of PAP households reporting restored or improved income vs. Baseline % reduction in PAPs relying on seasonal or aid-based income % of livestock keepers resuming pre-project herd size
Impact Monitoring	Evaluates long-term impacts on livelihood security and vulnerability. Typically part of final-year audit.	<ul style="list-style-type: none"> Sustainability of income and coping capacity Women's and youth involvement in economic recovery Recovered/improved access to natural resources (e.g., grazing areas) Beneficiary satisfaction with LRP outcomes 	<ul style="list-style-type: none"> % of women-headed households reporting increased income stability % of PAPs reporting full access to previous grazing/resource areas Monitoring of livestock health and productivity for at least one year post-relocation

12.4. MONITORING NUMBER OF HOUSEHOLDS AND RESPONSIBILITIES

The table below summarizes how often each monitoring component will be conducted, how many households it will cover (approximately), and which party is responsible.

TABLE 0-15 MONITORING NUMBER OF HOUSEHOLDS AND RESPONSIBILITIES

Activity	Number of Households	Responsibility
Progress Reporting	Quarterly	Corporate Social Manager / RAP Expert
Grievance Trend Review	Monthly	Corporate Social Manager
Final LRP Audit	End of Implementation	Independent Third Party Evaluator
Adaptive Review of LRP	As Needed	Enerjisa Üretim + Senior Management

EXTERNAL AUDIT AND COMPLETION REPORTING

An independent Completion Audit will be conducted to determine whether the LRP objectives have been met, particularly regarding the restoration of livelihoods and the inclusion of vulnerable and informal users. The audit will assess whether compensation and support measures were delivered in a timely, adequate, and participatory manner. Based on audit findings, the Project may continue monitoring or apply additional corrective measures if residual risks remain.

RAP/LRP REVISIONS AND FUTURE EXPROPRIATIONS

Should new reroutes, expansions, or future land acquisition be introduced, the RAP/LRP will be updated accordingly. These updates will use the latest available expropriation data and incorporate new vulnerability assessments and stakeholder input.

This M&E framework is designed to ensure that the Project remains responsive, inclusive, and committed to restoring and improving the livelihoods of all affected people throughout the entire LRP cycle.



ERM

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

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

ERM's Frankfurt Office

ERM GmbH Brüsseler Str. 1-3
60327 Frankfurt am Main

www.erm.com