



Livelihood Restoration Plan

Gaia Wind Power Plant Project

PREPARED FOR

ENERJİSA ÜRETİM

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Livelihood Restoration Plan

Gaia Wind Power Plant Project

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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
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
EU	European Union
GIIP	Good International Industry Practice
GIS	Geographic Information System
GM	Grievance Mechanism
ha	Hectares
HS	Health and Safety
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 Gaia Wind Power Plant Project (hereinafter “the Project” or “Gaia 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 Project is located in Muğla Province, Türkiye, and primarily affects the neighbourhoods of Kavakçalı, Turgut, Çakmak, and Yaraş (which is affected by the Energy Transmission Line). These settlements are located within the Project’s Area of Influence (AoI), and are characterized by a mix of small-scale farming, livestock grazing, beekeeping, and seasonal use of forest lands. While the majority of the land to be used is public forest land, some parcels of privately-owned or informally-used land may also be affected by temporary or permanent land acquisition, or access restrictions during construction.

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 Performance Standard 5 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 line)
- 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 1-1 apply to this LRP.

TABLE 1-1 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.
Eligibility	The right to receive compensation or livelihood assistance based on defined criteria, such as land tenure or asset ownership at cut-off date.

Term	Definition
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.
Stakeholders	Individuals, groups, or institutions affected by or interested in the Project and its outcomes.

Term	Definition
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 3), and reflects the following key principles:

- **Avoidance and Minimisation of Displacement:** The Project design prioritises the avoidance of physical and economic displacement wherever feasible. When displacement is unavoidable, measures are taken to minimise 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

A total of 20 turbines each with a power of 4.2 MWm/4.2 MWe are planned to be installed in Muğla Province, Köyceğiz and Ula Districts, Turgut, Çakmak and Kavakçalı Neighborhoods within the scope of the planned Project. The projected annual electricity generation amount of the project is 257,720,400 kWh/year.

In line with Turkish regulatory requirements, an Environmental Impact Assessment (EIA) is required for the Project. The Local EIA Report was prepared by a local consultancy and EIA Positive decision was issued by the Ministry of Environment, Urbanization, and Climate Change (MoEUCC) on 6th of June 2024.

The closest protected area to the EIA Study Area is "Kartal Lake Nature Park" located 5.3 km to the northwest. There is also Yılanlı Çakmak Wildlife Development Area at 7.5 km Northwest, Köyceğiz Wildlife Development Area at 15.5 km Southwest and Marmaris National Park at 17.5 km Southwest.

When the project area is examined, the closest structure is the household belonging to Turgut Neighborhood located 1585 meters northeast to the turbine area numbered T4.

1.6 PROJECT OVERVIEW

The total installed capacity of the facility will be 84 MWm/84 MWe. Enercon E-138 EP3 E2 / IEC S Class model turbine will be used within the scope of the project. The wind turbine used within the scope of the Project has a tower height of 111 meters and a rotor blade diameter of 138 meters.

The construction phase of the Project is expected to last 17 months, with a peak workforce of 225 personnel anticipated to be employed during construction and 10 personnel during the operational phase. As of October 2025, a total of 210 personnel is currently employed for the Project. Job announcements for the Project will be published through LinkedIn, Kariyer.net, HR-Web, the Enerjisa's official platforms, and the Project website . Candidates will be evaluated through a transparent and inclusive recruitment process involving initial screening, interviews, and necessary assessments. Local applicants will also be informed through community meetings, where interested individuals can register on application lists managed by the Community Liaison Officer (CLO). The CLO will act only as a facilitator, ensuring equal access for all applicants, while final hiring decisions will be made by the contractor companies.

The economic lifespan of the Project is projected to be 49 years. At the end of this period, the project life can be extended by carrying out the necessary modernization considering current legislation and technological developments.

Accommodation during the construction phase will be provided within a mobilization area set up in Turgut neighborhood. According to the latest information from the site, mobilization activities started by March 2025. The Project is planned to become fully operational by June 2026. The layout of the Project is given below.

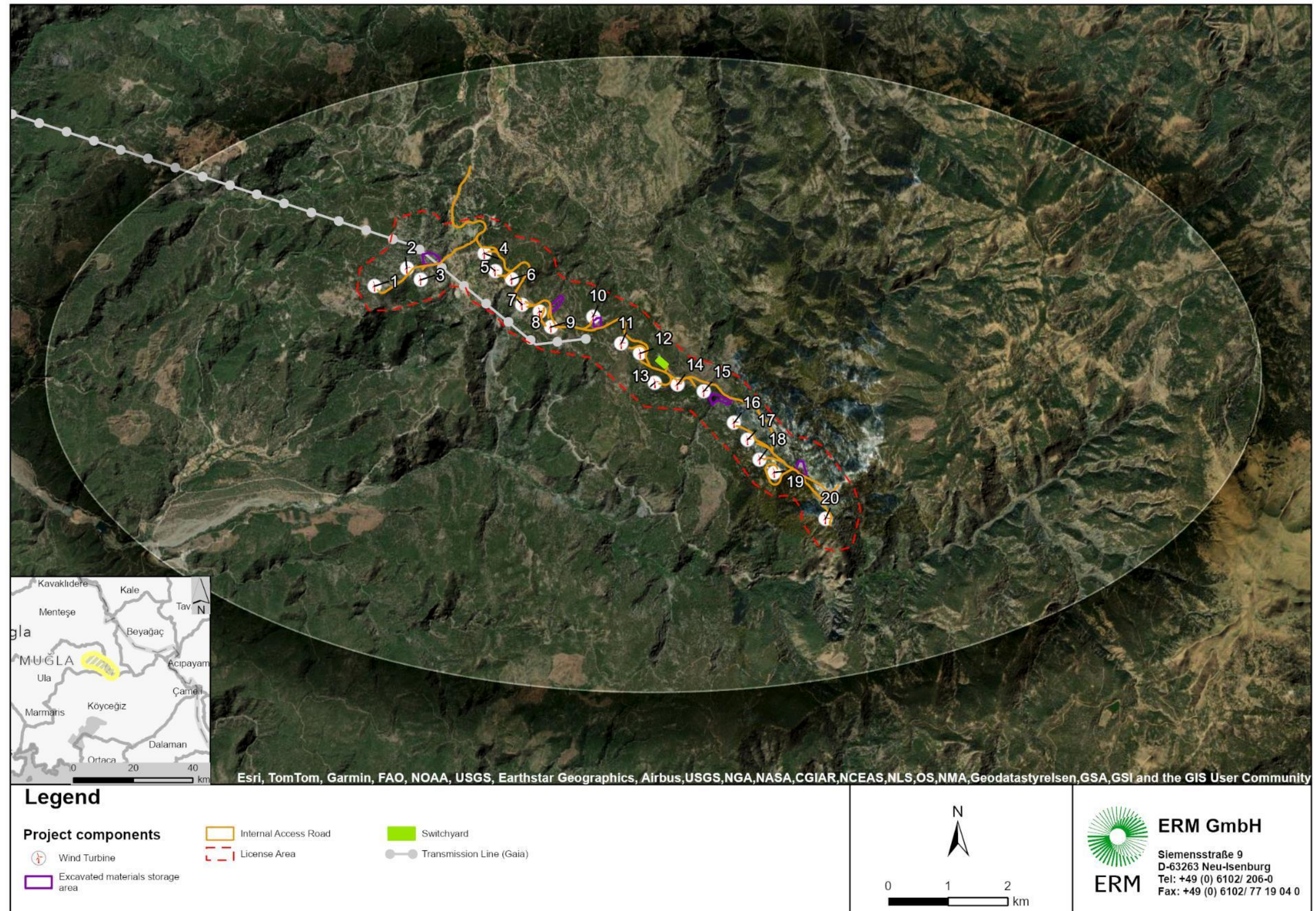


FIGURE 1-1 PROJECT LAYOUT

1.6.1 PROJECT LOCATION

The project is to be developed within the borders of Turgut, Çakmak and Kavakçalı Neighborhoods, Köyceğiz and Ula Districts of Muğla Province. The entire project area is located in the Forest Area according to the Aydın-Muğla-Denizli Planning Region 1/100.000 Scale Environmental Plan.

The nearest settlements within a 2 km buffer of Project boundary are:

- Turgut Neighborhood – 1 km north of the Project;
- Kavakçalı Neighborhood – 2 km southwest of the Project boundary.
- Çakmak Neighborhood – 3 km northwest of the Project boundary

The nearest settlements are presented in the Figure 1-2 below.

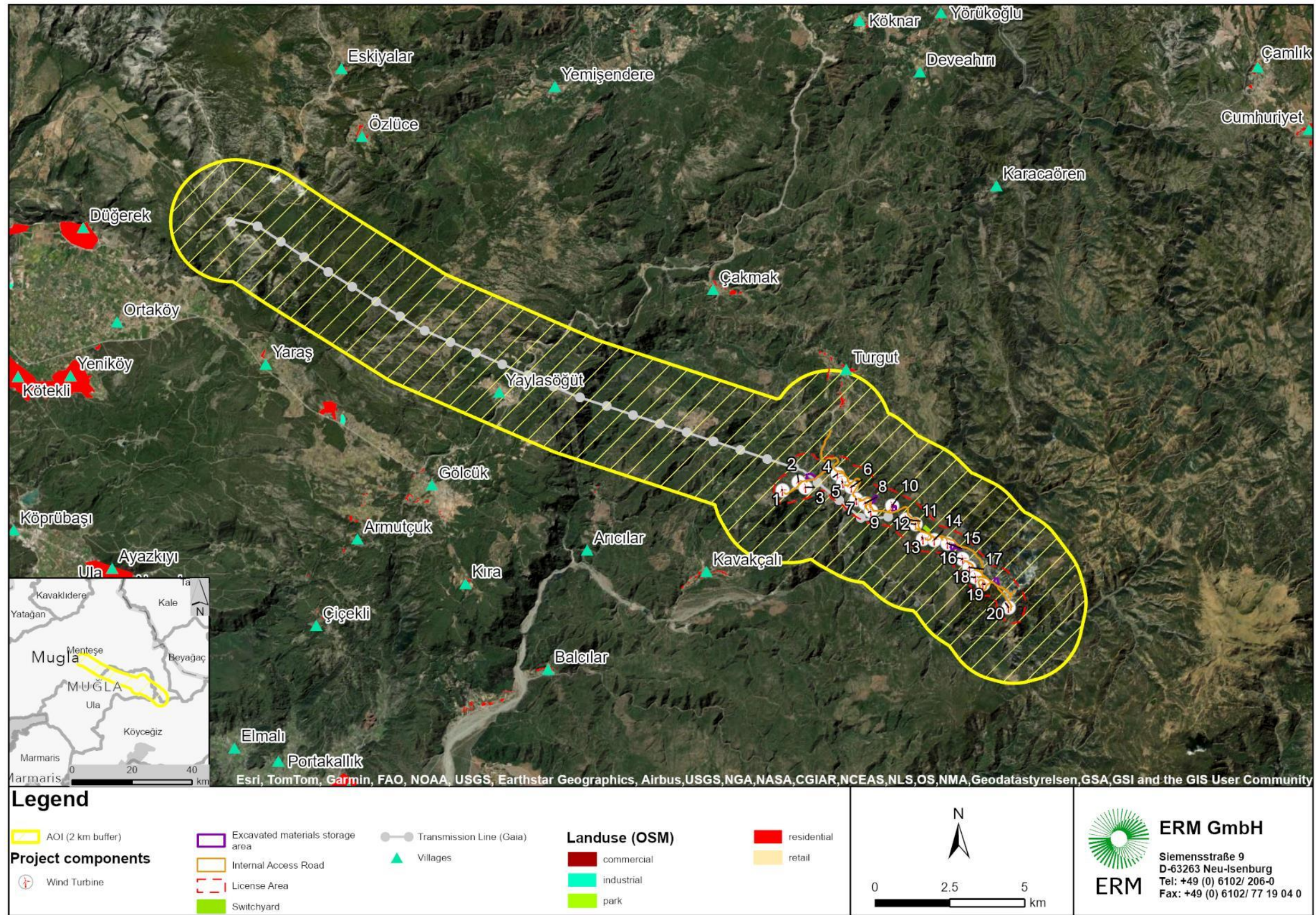


FIGURE 1-2 NEAREST SETTLEMENTS MAP

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

TABLE 1-2 LOCATIONS OF THE PLANNED WIND TURBINES

Wind Turbine No.	Coordinates (UTM - 6 degrees ED50)	
	Longitude	Latitude
T1	648379	4110537
T2	648919	4110835
T3	649150	4110641
T4	650214	4111084
T5	650395	4110791
T6	650673	4110652
T7	650846	4110228
T8	651138	4110110
T9	651329	4109851
T10	652034	4110028
T11	652506	4109574
T12	652823	4109412
T13	653069	4108923
T14	653445	4108888
T15	653885	4108774
T16	654393	4108251
T17	654619	4107966
T18	654821	4107639
T19	655067	4107419
T20	655921	4106640

1.6.2 PROJECT COMPONENTS

GAIA WPP Project consists of 20 wind turbines (each with a capacity of 4.2 MWm/4.2 MWe), 1 switchyard, 5 excess excavation material storage areas, mobilization areas, access roads and 1 ETL (154 kV) with 26 km length. No activities other than these units will be carried out within the scope of the Project at this stage.

1.7 PROJECT AREA OF INFLUENCE

The Area of Influence (AoI) for the LRP of the GAIA 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 the construction and operation of turbines, access roads, and construction camps.
- Settlements in proximity to the Project site and associated infrastructure that may experience loss of access to forest land, pasture areas, or disruption to local movement and economic activities.
- Villages where local employment, interaction with Project personnel, and changes in local market dynamics may have indirect effects on livelihoods.

The following neighborhoods are included within the LRP AoI based on field surveys and stakeholder interviews conducted in March 2025:

- Kavakçalı: The turbine site is located entirely within state forest land in this neighborhood. While the settlement itself is located 3.3 km from the turbine site, potential impacts on forest-based livelihood practices were assessed through interviews with the mukhtar and residents.
- Çakmak and Turgut: These neighborhoods are affected by both the power transmission line and Project access roads. In addition, two construction camps have been established on leased land within Turgut, and construction activities are ongoing. Households near these areas may experience access disruptions, increased vehicle traffic, and changes in land use.
- Yaraş: This neighborhood is traversed by the transmission line (ETL), which may lead to temporary or permanent restrictions on land use, particularly in agricultural plots or grazing areas.

The social AoI of the LRP has been delineated to ensure all economically displaced persons or land users, whether through land acquisition, restricted access, or reduced livelihood opportunities, are considered in the design of compensation and restoration measures.

The coordinates and proximity of each neighborhood to the Project boundary are summarized below:

TABLE 1-3 COORDINATES AND PROXIMITY OF EACH NEIGHBORHOOD

Neighborhood	District	Distance to Project Boundary	Latitude	Longitude
Çakmak	Menteşe	7.30 km	37°11'26.05"N	28°38'34.79"E
Kavakçalı	Ula	3.30 km	37°6'16.19"N	28°38'21.55"E
Yaraş (ETL)	Menteşe	5.00 km	37°10'8.4"N	28°28'37.2"E

Neighborhood	District	Distance to Project Boundary	Latitude	Longitude
Turgut	Ula	3.10 km	37°9'45.71"N	28°41'39.02"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 Project area includes three primary land ownership types: state-owned forest lands, treasury lands, and privately owned lands. Each type is subject to distinct legal procedures regarding land acquisition, expropriation, and use rights.

- **State Forest Land:** All of the wind turbine sites (out of 20 turbines) and the switchyard are located in Kavakçalı neighborhood (Ula District) on parcels officially registered as state-owned forest land. These lands are governed by Forest Law No. 6831. Use of these lands for energy generation purposes requires a long-term (49-year) usufruct right permit issued by the Ministry of Agriculture and Forestry, following a site-specific application and approval process.
- **Treasury Lands:** Areas designated as treasury land are generally used for access roads and part of the transmission line route. These lands are formally state-owned but not designated for forestry or other specialized public functions. They are transferred to the project proponent through easement rights granted by the General Directorate of National Real Estate. No compensation is paid for treasury land; the process is handled via administrative correspondence.
- **Private Lands:** These are primarily affected in the context of access roads. A total of seven privately owned parcels located in Turgut village will be subject to partial expropriation. Additionally, one parcel located in Çakmak village has been directly acquired by the Project Company. The expropriation process is conducted in accordance with Turkish Expropriation Law No. 2942. In compliance with IFC Performance Standard 5 (PS5), compensation will be provided at full replacement cost, not just national compensation value. A full Census and Asset Inventory of affected private parcels, including standing crops and trees, has been initiated.

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.

The table below provides an overview of the land types and applicable legal procedures:

TABLE 2-1 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 and the switchyard are located in Kavakçalı neighborhood (Ula District) on parcels officially registered as state-owned forest land.	Ministry of Agriculture & Forestry	Forest Law No. 6831	Long-term lease permit (49 years)	Yes – informal users
Treasury Land	Used for access roads and part of the transmission line route	Treasury (Ministry of Finance)	Law on National Real Estate	Easement rights (no compensation paid)	Yes – informal users
Private Land	Expropriation of private lands for Project access roads	Individuals / legal persons	Expropriation Law No. 2942	Permanent acquisition (full compensation)	Yes – legal owners, tenants

This LRP ensures legal compliance while enabling a comprehensive socio-economic impact assessment and compensation strategy. A detailed breakdown of each parcel and its ownership status is provided in Table 2-4.

2.1.1 LAND USE, OWNERSHIP, AND PROJECT FOOTPRINT

The Project is primarily situated on public lands, all wind turbines and the switchyard located on registered state forest land within Kavakçalı neighbourhood, Ula District. These parcels are officially classified under forest ownership by the General Directorate of Land Registry and Cadastre. As of the Environmental Impact Assessment (EIA) stage, no parcel registration was available for Turbine T15. Based on the most recent cadastral information provided by Enerjisa Üretim, a portion of T15 is located within the state forest registered as parcel 112 block 1, while the remaining section also falls within forest land but has not yet been assigned a parcel number.

Beyond the turbine locations, additional land acquisition is required to accommodate associated infrastructure, including access roads, transmission lines (ETL), and temporary use areas such as mobilization sites. These components traverse various land categories;

forest, treasury, and privately owned land, requiring a combination of long-term lease permits, easement rights, and permanent acquisition in accordance with applicable legislation.

Table 2-2 summarizes the types of land-related impacts across four project-affected neighbourhoods and Table 2-3 presents the land the need of the Project with their land acquisition status.

Based on this data, the impacts of the Project due to land acquisition are discussed under Chapter 6.

TABLE 2-2 IMPACTS OF THE PROJECT DUE TO LAND ACQUISITION

Project Affected Settlements	Type of Impact
Yaraş	Transmission line
Çakmak	Access road – Transmission line
Turgut	Access road – Transmission line – Mobilization area
Kavakçalı	Turbin Area – Switchyard

Source: Local EIA (May 2024)

TABLE 2-3 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	2	35.9	-	2 (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	16	41.74	8	8 (7 Treasury, 1 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

Project Component	Total Number of parcels affected	Total area affected (ha)	# of Private parcels	#Public (forest/treasury)	Type of impact	Land acquisition Status
						(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	3	Not available	3	-	Temporary	Lease agreements were signed for 1 year by contractors.
Total Excess Excavation Material Storage Area (if needed)	-	-	-	-	Temporary	Excavation and filling are balanced.
Sub-total for project	20	77.64	11	9	-	-
ETL (Poles)	3	-	1	2	Permanent for poles	within TEİAŞ's scope of authority
ETL (Cable)		0.37**			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.

**The area is given for the private parcel.

The turbine-specific land status is presented below. All turbine locations are situated on state forest land. No privately owned land parcels have been leased or used for turbine locations.

TABLE 2-4 TURBINE LOCATION AND LAND OWNERSHIP

Component	Province	District	Neighborhood	Block	Parcel	Property Status
T1	Muğla	Ula	Kavakçalı	112	1	State Forest
T2	Muğla	Ula	Kavakçalı	112	1	State Forest
T3	Muğla	Ula	Kavakçalı	112	1	State Forest
T4	Muğla	Ula	Kavakçalı	113	1	State Forest
T5	Muğla	Ula	Kavakçalı	113	1	State Forest
T6	Muğla	Ula	Kavakçalı	113	1	State Forest
T7	Muğla	Ula	Kavakçalı	112	1	State Forest
T8	Muğla	Ula	Kavakçalı	112	1	State Forest
T9	Muğla	Ula	Kavakçalı	112	1	State Forest
T10	Muğla	Ula	Kavakçalı	112	1	State Forest
T11	Muğla	Ula	Kavakçalı	113	1	State Forest
T12	Muğla	Ula	Kavakçalı	113	1	State Forest
T13	Muğla	Ula	Kavakçalı	113	1	State Forest
T14	Muğla	Ula	Kavakçalı	112	1	State Forest
T15	<i>No record found in the General Directorate of Land Registry and Cadastre's Parcel Inquiry System.¹</i>					
T16	Muğla	Ula	Kavakçalı	112	1	State Forest
T17	Muğla	Ula	Kavakçalı	112	1	State Forest
T18	Muğla	Ula	Kavakçalı	112	1	State Forest
T19	Muğla	Ula	Kavakçalı	112	1	State Forest
T20	Muğla	Ula	Kavakçalı	112	1	State Forest

Source: Local EIA

All turbines within the area defined as the Gaia WPP Turbine Area are located on designated state-owned forest land (35.9 ha) within the boundaries of Kavakçalı. These forest lands are under the authority of the Ministry of Agriculture and Forestry and are not subleased or privately operated. 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. Further information on the legal framework and procedures governing the use of forest lands for the Project is provided in Section 2.1.

¹ Based on the most recent cadastral information provided by Enerjisa Üretim, a portion of T15 is located within the state forest registered as parcel 112 block 1, while the remaining section also falls within forest land but has not yet been assigned a parcel number.

2.2 LAND REQUIREMENTS FOR ASSOCIATED FACILITIES AND INFRASTRUCTURE

While turbine sites are primarily located on forest land (a subset of state-owned land under the jurisdiction of the Ministry of Agriculture and Forestry), additional land acquisition is required for associated facilities such as access roads and the energy transmission line. These additional components intersect with both treasury-owned land (administered by the Ministry of Finance) and privately-owned land. As such, a combination of long-term permits, temporary easement rights, and permanent expropriation processes are being applied.

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 energy transmission line route intersects Yaraş neighborhood, where one parcel of private land will be affected. The required area will be accessed via easement rights. Easement rights are an expropriation type for the privately owned parcels, the treasure lands and state forest land types affected by the Project through the establishment of easement rights; which grant the Project the legal right to use a defined portion of land (typically aboveground or underground) without acquiring full ownership. Yaraş neighborhood will be subject to the impacts of the transmission line, and there are privately owned parcels affected by the Project through the establishment of easement rights.

Under Turkish law, easement rights allow the title deed to remain with the original owner but impose restrictions on land use such as prohibiting the construction of permanent structures or limiting access during construction and operation.

Further information on the legal basis and valuation of easement rights is provided in Section 3.1.

Table 2-5 below presents a summary of the ETL land requirements in the Yaraş neighborhood. The table provides detailed cadastral information on the private parcel affected by the establishment of easement rights, including the total area of the parcel and the portion to be used by the project. For the Gaia WPP, a total of 3 parcels is affected. One of these parcels is privately owned (0.37 ha) and two are public (forest/treasury).

TABLE 2-5 ETL EASEMENT SUMMARY

Province	District/Neighborhood	Block/Parcel	Surface area of the area to be used (ha)	Property Status
Muğla	Menteşe/Yaraş	407/1	0.37	Private

Given the socio-economic importance of the forested area where the ETL is planned to be installed for local communities and PAPs, potential impacts will be assessed in terms of restricted access to natural resources. These forested areas are commonly used for seasonal grazing, fuelwood collection, and non-timber forest product gathering, which contribute to local livelihoods. Further analysis of these access-related impacts and proposed mitigation measures is presented under in Chapter 60.

Figure 1-1 presents an overview of the planned ETL.

2.2.1.1 EXPROPRIATION EFFORTS

Under EBRD Environmental and Social Requirement 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 Performance Requirement 5 (ESRR5), 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. 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. 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 conducted several 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. For the Gaia Project, two main negotiation phases took place: (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 had been reached between Enerjisa Üretim and the parcel owners, no expropriation would have been required.

Enerjisa Üretim held five negotiation meetings with the affected parcel owners on 15.01.2025, 05.02.2025, 18.02.2025, 11.03.2025, and 10.04.2025. EMRA also held its official negotiation meeting on 09.10.2025.

2.3 ACCESS ROADS

A total of 16 parcels will be affected by the access road network. Of these, seven are treasury-owned and will be subject to easement rights only, 1 of them is forest land and is subject to a forest land use permit and eight are privately owned and require full or partial expropriation.² These impacts are primarily concentrated in Turgut (Ula) and Çakmak (Menteşe) neighborhoods.

TABLE 2-6 ACCESS ROAD LAND ACQUISITION SUMMARY

Province	District	Neighborhood	Block	Parcel	Total Area (m ²)	Surface area of the area to be used (m ²)		Property Status
						Property	Easement	
Muğla	Ula	Turgut	107	31	5,998.65	0.00	240.71	Treasure land
Muğla	Ula	Turgut	106	1	5,294.01	95.39	0,00	Private land
Muğla	Ula	Turgut	138	2	284.88	0.00	284.88	Treasure land
Muğla	Ula	Turgut	138	1	247.03	0.00	247.03	Treasure land

² The Project will comply with the requirements of IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement. This includes ensuring that any expropriation or involuntary land acquisition is conducted in accordance with national laws and international best practices, with full replacement cost compensation, meaningful consultation, livelihood restoration support, and access to a grievance redress mechanism. Particular attention will be given to minimizing displacement and addressing the needs of vulnerable groups.

Province	District	Neighborhood	Block	Parcel	Total Area (m ²)	Surface area of the area to be used (m ²)		Property Status
						Property	Easement	
Muğla	Ula	Turgut	0	TH1*	46.85	0.00	46.85	Treasure land
Muğla	Ula	Turgut	103	10	5,582.96	1,229.43	0.00	Private land
Muğla	Ula	Turgut	103	3	6,511.60	1,079.69	0.00	Private land
Muğla	Ula	Turgut	103	2	6,158.41	691.13	0.00	Private land
Muğla	Ula	Turgut	103	1	3,157.55	1,067.36	0.00	Private Land
Muğla	Ula	Turgut	0	TH2*	249.04	0.00	249.04	Treasure land
Muğla	Ula	Turgut	102	2	2,638.49	358.60	0.00	Private land
Muğla	Ula	Turgut	102	1	10,694.06	1,342.38	0.00	Private land
Muğla	Menteşe	Çakmak	170	3	2,312.06	0.00	447.78	Treasure land
Muğla	Menteşe	Çakmak	170**	4	1,921.36	977.86	0.00	Private land
Muğla	Menteşe	Çakmak	0	TH3	492.11	0.00	492.11	Treasure land

* The designation "TH parcel" is used for naming parcels that are non registered parcels.

** This parcel has been directly acquired by the Project Company

Source: Final EIA Report

Access to the Project site will be provided via an existing connection road from the D330 highway in the Çakmak-Turgut direction, located approximately 7 km northwest of the western border of the WPP.

The access roads necessary for the implementation of the Project will pass through the neighborhoods of Çakmak and Turgut presented in the figure below. During the construction phase, existing roads will be used as much as possible with necessary improvements, widenings, and deviations shown on the map as alternatives in Figure 2-1 below.

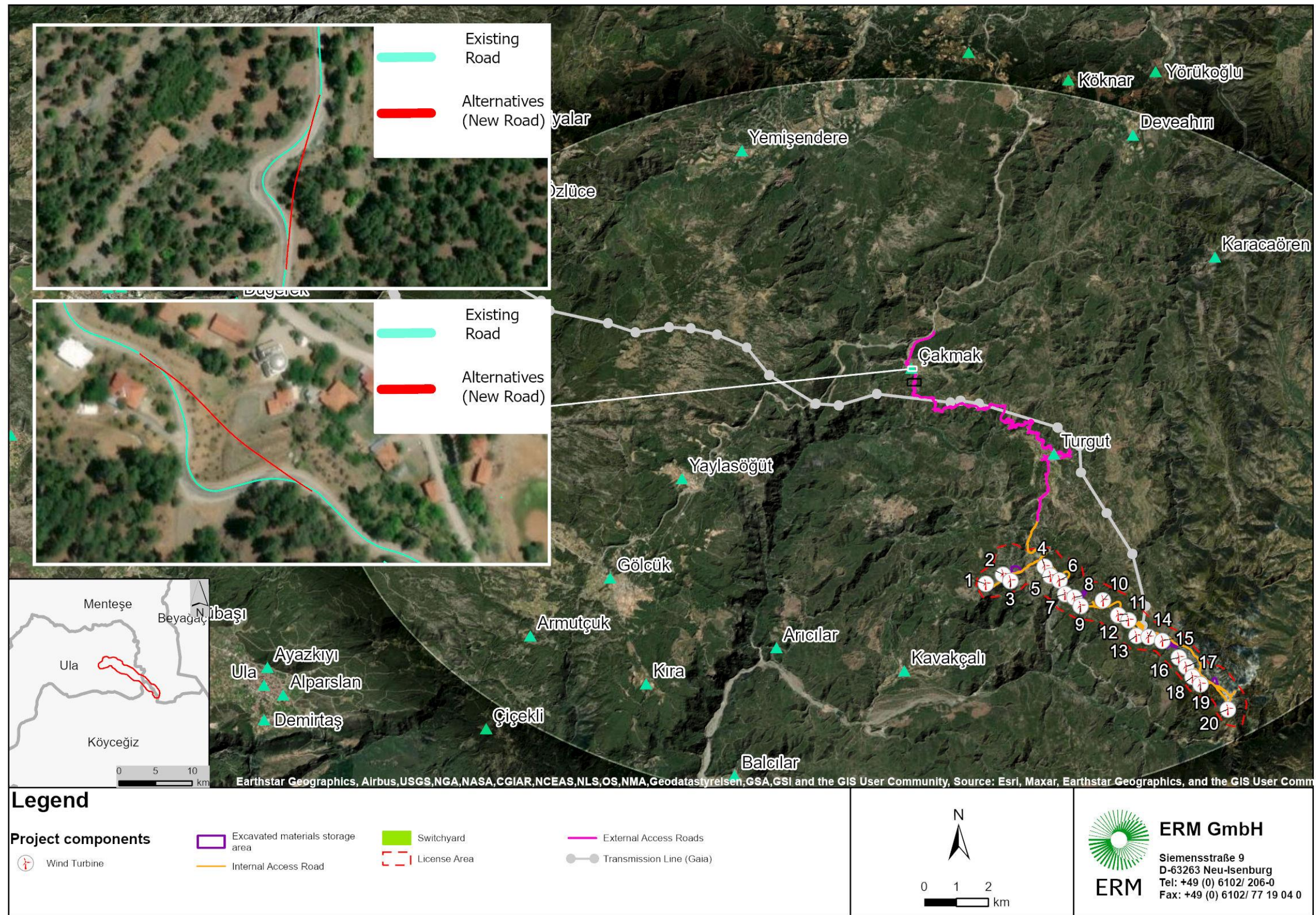


FIGURE 2-1 ACCESS ROADS

In summary;

- Privately owned plots to be expropriated: 8 parcels
- Treasury land to be used via easement: 7 parcels
- Forestry land to be used via forest land use permit: 1 parcel

In line with national legislation, the following permits and procedures are either underway or planned:

- **Forest Permits:** Required under Article 17 of Forest Law No. 6831, to be obtained from the General Directorate of Forestry for use of forest land.
- **Non-Agricultural Use Permit:** Required from the Provincial Directorate of Agriculture under Law No. 5403.
- **Development Plans:** 1/1000 and 1/5000 scale zoning plans will be prepared and submitted for approval as per the Zoning Law No. 3194.
- **Workplace Opening and Operation License:** Application will follow permit completion, in line with the Regulation on Workplace Licenses (Official Gazette No. 25902).

According to the most up-to-date information received from the Client, an access road has been included in the Project design to provide access to the turbine locations during the construction. This road will facilitate the transport of materials and equipment between the main construction site and individual turbine platforms.

Following the recent modifications in the access road layout, supplementary studies are required to assess the potential social impacts resulting from these changes (see Figure 2-2). Thus, a new field survey will be conducted on the access road 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.

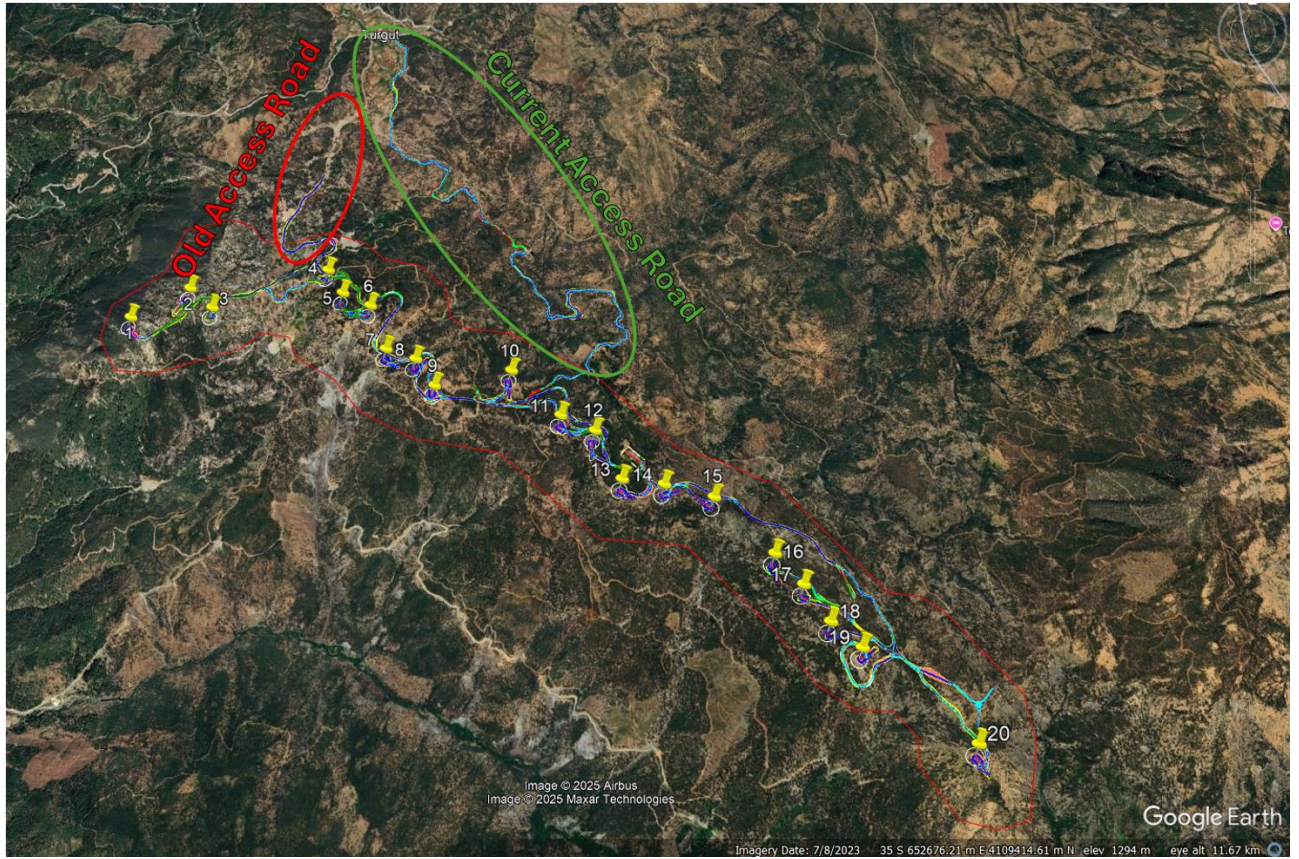


FIGURE 2-2 MODIFICATIONS IN THE ACCESS ROAD LAYOUT

3. LEGAL AND REGULATORY FRAMEWORK OF THE LRP

The LRP for the GAIA 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 PS5, 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 GAIA 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.
- **Forestry Law (No. 6831):** Requires permits and environmental compensation for the use of forest lands in renewable energy projects.
- **Pastures Law (No. 4342):** Governs conversion of pastureland. 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 criteria (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 GAIA 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 below.

TABLE 3-1 GAP ANALYSIS BETWEEN TURKISH NATIONAL LEGISLATION AND INTERNATIONAL STANDART

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 demonstrating that all feasible alternatives were assessed to avoid or reduce displacement.	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.
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.

Gap Subject	EBRD ESR5	Turkish Legal Provision	Gap Identified	Measures to bridge the gap
Cut off date	<p>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 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)</p>	<p>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. In order to prevent fraudulent claims, a digital cadastral and civil registry system based on individuals' current addresses is used.</p>	<p>Moderate gap: announcements may not be disclosed to everyone in line with ESR 5</p>	<p>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.</p>
Scope of Eligibility	Compensate and support informal	Only legal owners and formal users are	Major gap: Informal users of forest and	The Company will identify and

Gap Subject	EBRD ESR5	Turkish Legal Provision	Gap Identified	Measures to bridge the gap
	users/squatters of public lands	eligible for compensation. Informal users are not recognized.	pasture lands are not eligible for compensation under national law.	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 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	Align compensation with replacement cost standards.

Gap Subject	EBRD ESR5	Turkish Legal Provision	Gap Identified	Measures to bridge the gap
			meet the market rates	
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 some specific factors of the land to be expropriated. Structure compensation may deduct depreciation; public land users are excluded.	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. 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.

Gap Subject	EBRD ESR5	Turkish Legal Provision	Gap Identified	Measures to bridge the gap
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.	<p>Enerjisa will support the land acquisition process managed through EPDK. They will engage regular meetings with PAPs during implementation of LRP.</p> <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>

Gap Subject	EBRD ESR5	Turkish Legal Provision	Gap Identified	Measures to bridge the gap
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.	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.

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

The sub chapters below provide further information on the LRP data collection methodology.

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 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 EBRD ESR5 requirements.

The field data collection process for the LRP builds on the broader ESIA work conducted for the Project. It has been refined and supplemented to specifically identify, assess, and document project-induced economic displacement, livelihood impacts, and the status of PAPs, including vulnerable groups.

The methodology follows the standards and good practices set out in IFC PS5 and EBRD ESR5, with the aim of identifying all affected persons, regardless of tenure status, and understanding the full range of livelihood-related impacts.

The LRP data collection process was conducted in three main phases:

- Preliminary Desktop Studies
- Field Research and Interviews
- Data Analysis and Validation

All tools, sampling strategies, and implementation protocols were designed to ensure inclusiveness, accuracy, and sensitivity to the Project context.

DESKTOP STUDIES

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

Development of structured field survey tools, including:

- Household Survey Form
- Mukhtar Interview Form
- Women's Livelihood & Forest Use Interview Form³

Mukhtars, as the elected heads of villages and key local informants, play a central role in community affairs and land-related matters. Their knowledge was essential to identify affected land users, seasonal patterns of forest use, and potential community-level impacts.

³ While the Household Survey and Mukhtar Interview forms were not applied in a gender-segregated manner due to the prevailing socioeconomic structure of the region, men were often more visible and dominant in public village spaces and interviews. As a result, women's perspectives—especially on livelihood and forest resource use—were underrepresented in standard interviews. To address this gap and ensure meaningful participation of women, a separate tool—the Women's Livelihood & Forest Use Interview Form—was developed to facilitate focused discussions with women and to capture their specific roles and vulnerabilities in relation to land and natural resource use.

Preliminary works also include;

- Training of the field team on survey ethics, confidentiality, and gender-sensitive interviewing.
- Scheduling of site visits and surveys and mapping of access routes
- Coordination with local authorities and mukhtars for community entry

Within the scope of preliminary studies, the identification of households and key resource users for interviews was informed by cadastral parcel data, consultations with mukhtars, and observations of land use around the project footprint. This process helped target households located within or adjacent to expropriation areas and those engaged in agriculture, livestock, or forest-based activities likely to be affected by the project.

FIELD STUDY

Field study was carried out in the four affected neighborhoods: Yaraş, Turgut, Çakmak, and Kavakçalı, between 20–23 March 2025. A team of five researchers conducted household surveys, key informant interviews, and observational assessments over a four-day period.

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 EBRD ESR5 requirements.

4.1.1.1 HOUSEHOLD SURVEYS

Household surveys were based on targeted interviews with people who might be affected by land acquisition and potential access restrictions that might arise from construction. Households were identified through a combination of cadastral data and consultations with mukhtars and local authorities. Specifically, land users and/or owners of plots located within the designated expropriation areas were identified, as well as individuals conducting agricultural or livestock activities adjacent to the project construction areas and access roads, who might face temporary access restrictions or economic impacts.

This approach allowed for both legal tenure holders and informal users with potential exposure to project impacts to be captured in the survey design.

The surveys collected detailed information on:

- Household demographics and income sources
- Agricultural and livestock livelihood activities
- Seasonal labor and migration
- Forest/pasture use
- Asset ownership
- Vulnerability status

A total of 32 households were surveyed (Yaraş: 4, Turgut: 18, Çakmak: 7, Kavakçalı: 3). Additional interviews were held with three livestock herders and two beekeepers who use forested areas near the turbine sites in Kavakçalı.

4.1.1.2 COMMUNITY-LEVEL INTERVIEWS

Structured interviews were conducted with mukhtars in all four neighborhoods to understand:

- Local socio-economic dynamics
- Perceptions of the Project
- Settlement-level resource use and land tenure
- Identified vulnerable households or groups
- Concerns about displacement and livelihood impacts
- Additional information to check socioeconomic data from household surveys

The following surveys were designed and conducted specifically to inform the LRP, focusing on stakeholders likely to be affected by land acquisition and access-related impacts identified during the ESIA development studies.

TABLE 4-1 LRP SURVEYS TARGETED AND CARRIED OUT

District	Settlement	Planned	Completed	Mukhtar Survey
Menteşe	Yaraş	5	4	1
Ula	Turgut	15	18	1
Menteşe	Çakmak	5	7	1
Ula	Kavakçalı	5	3	1

Source: Muğla YEKA ESIA Field Study Findings, March 2025

4.1.1.3 LIMITATIONS

Despite the methodological rigor applied to the LRP fieldwork, several limitations were encountered that affected the comprehensiveness and representativeness of the data collected. These limitations are described below, alongside the measures taken to mitigate their impact on the LRP design.

Lack of Project Awareness Among PAPs

A key limitation observed across all Project-affected settlements was the limited awareness among PAPs regarding the Project's scope, planned activities, and potential impacts. Despite the fact that information meetings were conducted by the Project Company in 2024, site findings suggest that awareness levels in these neighborhoods remain low. This lack of awareness affected both their willingness to participate and, in some cases, their ability to provide meaningful responses during household interviews. Uncertainty was

particularly evident regarding land acquisition procedures, compensation eligibility, and timelines.

Although some initial Project-related information had been shared by Project representatives with local mukhtars prior to the LRP fieldwork, these engagements were found to be not sufficient to ensure broad community-level understanding. However, they did help establish a basic awareness and created a degree of acceptance for the field team's presence. Information meetings were held in Kavakçalı, Turgut, and Çakmak villages in December 2024.

Building on this, enumerators provided additional verbal explanations about the Project immediately before conducting interviews.

Uncertainty Regarding the Land Acquisition Process

During the March 2025 fieldwork, the expropriation and leasing processes for land acquisition were still ongoing and, in some areas, not yet initiated. As of March 2025 when this LRP was initiated final alignment of ETL parcels, most of which are expected to pass through forest land, had not been confirmed, nor have the official expropriation lists been finalized.

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 out for this Project component. Findings will be annexed and integrated into this LRP as relevant.

Access Constraints in Remote and Forested Areas

The turbine site is entirely located within the state forest in Kavakçalı neighborhood and lies approximately 3.5 kilometers from the nearest residential area, on steep, forested terrain. Due to the site's limited accessibility, five forest-dependent individuals, each representing a separate household and who seasonally use the area, were identified and reached out for interviews. These individuals provided valuable information on their resource-based livelihoods, including patterns of grazing, forest product collection, and seasonal use. Given their limited access to formal project information and geographic isolation, they were understandably unfamiliar with the broader project scope or potential community-wide impacts.

Their role in the LRP fieldwork was not to assess impacts, but to share first-hand accounts of how they use and depend on forest resources. These insights served as a direct input for the consultant team to assess potential income-related impacts, which was the primary purpose of the LRP-specific survey.

Low Female Participation and Sensitivity Around Livelihood Loss

The number of women interviewed during the fieldwork remained low, with only 5 out of 32 surveyed households including female respondents. This limited participation was primarily due to cultural dynamics, gendered access barriers, and the nature of

predominant livelihood activities in the area—such as animal husbandry, beekeeping and olive farming which are typically male-dominated.

A women-specific Focus Group Discussion (FGD) was initially planned as part of the LRP fieldwork. However, due to low trust, limited availability, and reluctance to participate, the FGD could not be successfully held. Instead, efforts were made to reach women through individual interviews. specifically:

- One woman participated in an in-depth interview as a voluntary land lessee at the construction site;
- Two women in Turgut and two in Çakmak participated in household surveys conducted under the LRP.

In villages where economic activity—especially beekeeping and small-scale farming—has already been in decline due to a combination of demographic, environmental, and market-related factors. Stakeholders expressed concerns that the Project may act as an additional stressor, potentially influencing the sustainability of the remaining livelihood sources.

Community Fatigue and Mistrust Toward Surveys

In certain neighborhoods, community members—particularly those who had previous negative experiences with state-led expropriation or infrastructure projects—expressed mistrust toward field teams and concern over the purpose of the study. While efforts were made to build rapport through mukhtar introductions and the presence of a trusted site representative, some PAPs refused to participate or gave very limited responses, reducing data richness. In some areas, notably in Kavakçalı and Çakmak, survey fatigue and skepticism about Project benefits were clearly evident, not solely attributable to this Project but also shaped by previous experiences in the region.

Limited Representation in Kavakçalı

Due to field access constraints and the absence of directly affected residential land, household surveys in Kavakçalı were few in number and largely supplemented with in-depth interviews with the mukhtar, as well as secondary data and ESIA findings. This resulted in a lower volume of primary household-level data for that settlement, especially concerning broader community-level social dynamics.

Despite these challenges, the field team made every effort to ensure that data collected was valid, representative, and actionable. Supplemental qualitative data, triangulation with secondary sources, and mukhtar insights were used to fill gaps. These limitations have been explicitly considered in the design of the LRP, particularly in defining entitlements for vulnerable groups, natural resource users, and informal occupants, whose voices may not have been fully captured through survey instruments alone.

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

The subsections below present general socio-economic information on the affected individuals as well as on the broader communities within the project's area of influence. In the absence of complete, project-specific socio-economic data for households experiencing resettlement or livelihood impacts, general community-level data has been used at this stage, as the detailed information on impacted people was not yet available at the time of preparing the LRP.

While several interviews have already been conducted with owners of impacted land parcels, additional interviews are planned for November 2025 with further landowners. The baseline chapter will be updated once the full set of socio-economic data has been collected.

5.1 DEMOGRAPHIC STRUCTURE OF THE PROJECT AOI

This section provides a brief demographic overview of the four settlements within the GAIA Project Area of Influence (AoI), based on 2024 TurkStat data and ESIA field study findings. Detailed socioeconomic baseline data—including age, education, and household composition—are presented in the ESIA, particularly in Chapter 6.3.

The largest settlement in the project area is Yaraş, followed by Turgut, Kavakçalı, and Çakmak. Population figures from TurkStat 2024 are presented below for reference:

TABLE 5-1 POPULATION IN AFFECTED SETTLEMENTS

Settlement	Total Population	Male	Female
Yaraş	849	425	424
Turgut	452	252	200
Kavakçalı	316	178	138
Çakmak	191	101	90

Source: TurkStat ADNKS, 2024

According to field data collected in March 2025 as part of the ESIA, the AoI is characterized by an aging population, relatively low education levels, and varying household sizes across settlements. Notably, single-person (elderly) households account for 3.5%, and households with six or more members represent approximately 13.8% of the total surveyed population. Average household size varies between 3 and 4 persons depending on the settlement.

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 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.

The livelihood source of the households living in Gaia AoI is presented in Table 5-2 according to field study findings carried out in March 2025.

All settlements within the project impact areas are based on a rural economy. In these regions, the primary economic activities have been identified as agriculture, livestock farming and beekeeping. Additionally, wage labor and pensions are also among the sources of household income.

Primary Income Source: The primary economic activity in the neighborhoods within the area of impact is agriculture.

When the primary source of income is evaluated, income from agriculture (plant production) is the primary source of income for Yaraş, Turgut and Çakmak villages. Agricultural activities constitute the main source of income for 34.4% of the households. This is followed by retirement salaries (25%) and blue-collar salaried jobs (25%), indicating a significant presence of both retired individuals and wage workers in the local workforce. In contrast, animal husbandry is reported as the main source for only 3.1% of the households.

The primary source of income in Kavakçalı neighborhood is forestry. Forestry is the primary source of income in Kavakçalı due to the unsuitability of the lands for agriculture and animal husbandry and because it is a forest village.

Secondary Income Source: Retirement and animal husbandry stand out as the most common secondary source of income for households in the GAIA project AoI. This shows that many households engage in animal husbandry as a complementary economic activity rather than a primary activity, while retirement income is observed as the secondary source of income in Kavakçalı instead of animal husbandry. It was observed that there were also households that stated agriculture as a secondary source of income. This situation indicates the limited

availability of suitable land for agricultural activities in the region, but it also shows that activities such as olive and small-scale garden farming are carried out. 1568% of the households reported that they did not have a secondary source of income, indicating a potential vulnerability among this group.

Tertiary Income Source: Pensions emerged as the dominant tertiary source in Yaraş, Turgut and Çakmak (37.9%), while beekeeping was the dominant tertiary source in Kavakçalı. 31% of the households did not report a tertiary income, indicating some economic dependence on one or two sources.

TABLE 5-2 SOURCES OF INCOME IN THE PROJECT AOI

Sources of income	Main livelihood source of the household		Second livelihood source of the household		Third livelihood source of the household	
	Number of households	%	Number of households	%	Number of households	%
Agriculture (plant production)	11	34.4	7	21.9	3	9.4
Animal husbandry (animal production)	2	6.3	15	46.9	3	9.4
Pension	8	25.0	1	3.1	11	34.4
Forestry ⁴	0	0	1	3.1	0	0
Blue-collar paid, salaried work in a factory etc.	8	25.0	2	6.3	1	3.1
Social support	1	3.1	1	3.1	1	3.1
Business and freelance income (Small tradesmen -grocer, greengrocer,	2	6.3	0	0	1	3.1

⁴ Due to the limited number of PAPs (Project Affected Persons) we were able to engage with, the survey results may not fully represent all sources of income in the Area of Influence (AoI). In particular, forestry is known to be a major source of income in the AoI; however, this is not reflected in the survey outcomes due to limited survey participation.

Sources of income	Main livelihood source of the household		Second livelihood source of the household		Third livelihood source of the household	
	Number of households	%	Number of households	%	Number of households	%
butcher, haberdashery etc.)						
No secondary/tertiary income	0	0	5	15.6	12	37.5
Total	32	100	32	100	32	100

Source: Social Field Survey, March 2025

Annual income expenses of the households: The leading primary expense is agricultural costs (40.6%), which include inputs such as fuel, fertilizer, and feed. This finding highlights the ongoing significance of agriculture not only as a livelihood but also as a major financial commitment. It is followed by market and food expenses (18.8%) and livestock-related costs (21.9%). This structure suggests that many households prioritize maintaining their production capacity, particularly in plant and animal-based agriculture. Utility bills (9.4%) is also noted but at lower frequencies. Only 6.3% of respondents reported debt repayment as a primary expense, which may reflect either low borrowing or underreporting.

In terms of second-priority spending, utility bills (50%) are the most reported, reflecting the burden of regular household operations such as electricity and water. This is followed by market and food expenses (21.9%), reinforcing the centrality of food security. Other reported items include agriculture (6.3%), livestock (3.1%), transportation, rent, investment and debt repayment, each with relatively minor representation.

Market and food expenses dominate again as tertiary costs (40.6%), which, along with their high ranking across all categories, suggests they are continuous and significant across household budgets. Debt repayment (6.3%) and livestock costs (6.3%) also appear here, along with utility bills (9.4%). Additionally, health and personal care expenses (3.1%) are only reported in this third tier, which may indicate either low healthcare access or a cultural tendency to downplay such costs. Notably, 31.3% of households did not specify a third category.

TABLE 55 ANNUAL INCOME EXPENSE CATEGORIES

What are the expense categories of your annual income?	First		Second		Third	
	Number of households	(%)	Number of households	(%)	Number of households	(%)
Market and food expenses	6	18.8	7	21.9	13	40.6
Transportation/travel costs (to school, workplace, etc.)	0	0	1	3.1	0	0
Agricultural expenses (fuel, fertilizer, feed, etc.)	13	40.6	2	6.3	1	3.1
Livestock expenses (feed, veterinary services, etc.)	7	21.9	1	3.1	2	6.3
Investments in agriculture, trade, or industry	1	3.1	1	3.1	0	0
Utility bills (water, electricity, etc.)	3	9.4	164	50	3	9.4
Rent	0	0	1	3.1	0	0
Health and personal care expenses	0	0	0	0	1	3.1
Heating expenses	0	0	1	3.1	0	0
Debt repayment	2	6.3	2	6.3	2	6.3
No response	0	-	0	-	10	31.3

What are the expense categories of your annual income?	First		Second		Third	
	Number of households	(%)	Number of households	(%)	Number of households	(%)
Total	32	100	32	100	32	100

Muğla YEKA HHL Survey, March 2025

AGRICULTURAL AND HUSBANDRY ACTIVITIES

According to the data, the rate of households stating that they continue their agricultural activities is 75% (24 households). This finding reflects the continuation of small-scale farming and livestock practices in the area, which have declined based on the baseline information in recent years due to migration and economic pressures, and are now mostly maintained by older generations.

The primary type of agricultural activity in the region is subsistence farming. Barley, wheat, and silage corn are also cultivated in the region. Vegetables and fruits produced in excess of household consumption are sold in nearby local markets. One of the main reasons for the decline in agricultural production is the high cost of inputs. A secondary issue is the lack of labor due to the decreasing and aging population. It has been reported that the younger population prefers wage labor and tends to seek employment in other sectors such as the marble industry, organized industrial zones, and tourism-related jobs. During visits to the villages, the aging population was clearly observed.

Due to geographical limitations in Kavakçalı, agricultural activities are carried out at the horticultural level for household consumption. It has been determined that the number of households selling agricultural products in Project AoI is very limited and that more of these sales than household consumption is realized in the local market. The following section discusses the opinions of households regarding the potential impacts of the Project on their agricultural activities.

TABLE 5-3 ENGAGE IN AGRICULTURAL ACTIVITIES

Are you a farmer or do you engage in agricultural activities?	Number of Households	Percent
Yes	24	75
No	8	25
Total	32	100

Source: Muğla YEKA ESIA Field Study Findings, March 2025

When asked about the potential impacts of the project on their agricultural income, 50% of PAPs (15 out of 32 households) stated that they expect to lose income as a result of the project. This reflects a significant level of concern among half of the respondents.

On the other hand, 28.1% (9 households) believe that the project will not negatively affect their agricultural activities. Notably, 25% (8 households) responded that they do not know, indicating a considerable level of uncertainty.

This uncertainty appears to be linked to two key factors: the physical location of the project, which may not directly intersect with current cultivation zones, and a lack of clear or sufficient information about project activities and their potential consequences.

In general, majority of PAPs expect negative impacts or are unsure, which reveals a high level of perceived risk or ambiguity. This highlights the importance of transparent communication and community engagement to ensure that stakeholders are adequately informed and that their concerns are meaningfully addressed, particularly in a region where agriculture is a critical livelihood source.

TABLE 5-4 THOUGHTS ON THE IMPACTS ON AGRICULTURAL ACTIVITIES DUE TO THE PROJECT

Do you think you will lose income from your agricultural activities due to the project?	Number of Households	Percent
Yes	15	46.9
No	9	28.1
Don't know	8	25.0
Total	32	100

Source: Muğla YEKA ESIA Field Study Findings, March 2025

According to the survey results, 56.3% of PAPs (18 out of 32) stated that they have no knowledge of the potential impacts of the project on their agricultural income. The most commonly expressed concern among those who did respond was the cumulative impact of land expropriation, noise, and dust, mentioned by 25% (8 respondents). Additionally, 12.5% (4 respondents) indicated that dust may reduce the yield and quality of crops, particularly olives. 6.3% (2 respondents) expressed concerns about restricted access to their lands due to the project.

TABLE 5-5 INCOME LOSS OPINIONS OF THE PAPs

What kind of impact will you experience that would result in income loss?	Number of Households	Percent
No idea	18	56.3
Access to the lands will be restricted	2	6.3
There will be cumulative impacts such as expropriation of land, noise and dust.	8	25
The yield of the lands and the quality of the crops, especially for olive oils, will decrease due to dust.	4	12.5
Total	32	100

Source: Muğla YEKA ESIA Field Study Findings, March 2025

According to the data, there is no household that uses treasury or state land in agricultural production among the survey participants. Due to the geographical structure of the region, there are no treasury lands that are agricultural areas in the area of influence. All state lands are forests. The ways in which PAPs benefit from these forests are discussed under the title of PAPs' utilization of surrounding forests.

The proportion of PAPs whose land, either owned or used, was previously affected by another project is 6.3%

TABLE 5-6 PRIOR PROJECT IMPACT ON OWNED OR USED LAND

Has the land you own, or use been affected by another project before?	Number of Households	Percent
Yes	2	6.3
No	30	93.7
Total	32	100.0

Source: Muğla YEKA ESIA Field Study Findings, March 2025

According to household and Mukhtar interviews, livestock farming is carried out as a source of income by a small number of households within Project AoI, and it mainly functions as a small-scale activity for household consumption. The following assessments reveal the intensity of livestock farming activities at the settlement level.

Animal husbandry is a key livelihood activity in the Project-affected settlements. However, the scale and type of livestock activities vary considerably across the four villages.

Turgut stands out with a relatively high intensity of both cattle and small ruminant farming. Among 500 households, 100 are engaged in large cattle breeding (80%) and another 100 in small ruminant breeding (also 80%). This indicates that the activity is carried out primarily at a subsistence level to meet household needs, rather than on a commercial scale.

Yaraş has the highest number of cattle (600) and a relatively large share of households (200) involved in cattle farming. However, only 2 households (0.44%) reported engagement in small ruminant breeding despite a total small cattle count of 500. This suggests that while cattle breeding is widespread, small ruminants are likely concentrated in a few commercial operations or managed communally, rather than through household-level activities.

Çakmak demonstrates a high percentage of engagement in both livestock categories: 85.7% of households are involved in cattle breeding and the same proportion (85.7%) in small ruminant farming. Despite having fewer animals overall than other villages, this reflects a widespread dependence on small-scale mixed livestock keeping. This further reinforces the conclusion that animal husbandry in this settlement is primarily subsistence-based.

Kavakçalı, where the turbine area is located, shows a moderate level of cattle ownership (100 animals) and 72.7% of households engaged in cattle farming. However, only 5 households (4.5%) are involved in small ruminant farming despite a relatively high total number of small ruminants (500). These figures suggest that small ruminant breeding is undertaken by a limited number of households.

Although livestock activities are generally widespread across the settlements, the relatively low number of animals per household indicates that such activities are mostly carried out at a subsistence level, intended to meet basic household needs rather than for commercial purposes.

Turgut and Çakmak appear to be more sensitive compared to Kavakçalı in terms of both total livestock numbers and the proportion of participating households. These settlements are therefore more likely to experience adverse social and economic impacts from Project-related factors such as access restrictions to pastures, construction of access roads, or noise disturbance. While Yaraş gives the impression of centralized or semi-commercial production, in Kavakçalı, livestock activities appear to be concentrated in a smaller number of households.

TABLE 5-7 ANIMAL HUSBANDRY ACTIVITIES

Settlement	Number of cattle ⁵	Households engaged in cattle breeding		Number of small ruminant ⁶	Households engaged in small ruminant	
		Number of Households	Percent		Number of Households	Percent
Turgut	400	100	80.0	500	100	80
Yaraş	600	200	44.4	500	2	0.4
Çakmak	120	60	85.7	200	60	85.7
Kavakçalı	100	80	72.7	500	5	4.5

Source: Muğla YEKA ESIA Field Study Findings, March 2025

According to the findings, households and mukhtars reported that they purchase feed for their livestock throughout the entire year (12 months) due to the limited agricultural and pasture lands in the region.

This reinforces the earlier finding that livestock expenses constitute the third largest household expenditures.

Since the villages are surrounded by lands mostly consisting of state forests, these lands or the grazing areas around them are also used for grazing animals. Although these areas are far from the turbine site, they can be considered as areas close to the ENH and access roads.

FORESTRY AND BEEKEEPING ACTIVITIES

Despite the continuous decline, Muğla province remains a leader in Türkiye's beekeeping activities. During consultations, the decline in beekeeping was attributed to several factors, including environmental impacts (such as sudden temperature fluctuations and agricultural chemicals), the younger generation's disinterest in fields like beekeeping, livestock farming, and agriculture, and the high cost of production.

Observations suggest that young people prefer jobs with social security (SGK) and perceive beekeeping and similar activities as labor-intensive and incompatible with their career

⁵ According to the data obtained from mukhtars

⁶ According to the data obtained from mukhtars

aspirations. Consequently, they tend to favor employment in the service sector or establishing and managing commercial enterprises. Production activities are predominantly maintained by middle-aged and older populations.

Beekeeping is practiced across all four Project-affected settlements; however, its scale, prevalence, and economic importance vary significantly from village to village. While some settlements demonstrate a relatively high number of beehives, the proportion of households engaged in beekeeping often remains limited suggesting that beekeeping is concentrated in a few households and in many cases conducted at a subsistence or supplementary level.

In Turgut, beekeeping appears as the most intensive among the four settlements, with 4,000 beehives and 40 households engaged in the activity, representing 32% of all households. This high engagement rate, coupled with the number of beehives, indicates that beekeeping plays a notable role in local livelihoods, likely to contribute both to household income and consumption.

In Yaraş, there are 2,000 beehives and 100 households (22.2%) involved in beekeeping. While the total number of hives is half that of Turgut, the higher number of households involved suggests a more dispersed structure, potentially with fewer hives per household. This points to a broad-based but small-scale approach, possibly geared toward family consumption and supplementary income generation.

In Çakmak, beekeeping is practiced at a very limited scale, with only 500 beehives and 4 households (5.7%) involved. Despite the small scale, the concentration of hives among a few households may indicate semi-commercial operations, or specialized household engagement rather than widespread community practice.

In Kavakçalı, where the turbine area is located, beekeeping is also practiced at a modest level, with 2,500 beehives and 10 households (9.1%) engaged. This again reflects low household participation but relatively high hive density, suggesting that 10 households own a large number of hives. Given that agriculture and animal husbandry are primarily for household use in Kavakçalı, beekeeping may represent a more economically oriented activity in this specific context.

The low percentage of households engaged in beekeeping in Çakmak and Kavakçalı, despite notable hive counts, indicates that apiary operations are concentrated in a few households, and potentially pursued as a secondary income source or semi-commercial venture.

In contrast, Turgut and Yaraş demonstrate a higher household participation, with Turgut in particular standing out as the only settlement where beekeeping may represent a more significant component of household economies.

TABLE 5-8 BEEHIVES AND HOUSEHOLDS ENGAGED IN BEEKEEPING

Settlement	Number of beehives	Household engaged in beekeeping	
		Number of Households	Percent
Turgut	4000	40	32
Yaraş	2000	100	22.2
Çakmak	500	4	5.7
Kavakçalı	2500	10	9.1

Source: Muğla YEKA Field Study Findings, March 2025

PAPS' UTILIZATION OF SURROUNDING FORESTS

Another livelihood activity examined was whether PAPs used the forests around their village or neighborhood to collect mushrooms and medicinal plants. According to the survey results, 100% of all households reported utilizing the surrounding forests for this purpose, indicating that forest use is a common and essential livelihood activity among all respondents.

The villages of Turgut, Yaraş, Çakmak, and Kavakçalı in Muğla are all surrounded by forested areas and can be classified as forest villages. Residents of these settlements utilize the nearby forests in various ways, primarily for subsistence purposes and natural resource access.

Turgut: Turgut is closely integrated with its surrounding forests. Residents primarily use forest areas as grazing land for livestock, particularly for small ruminants. However, in recent years, increased jackal attacks in these areas have negatively affected free-range grazing practices, pushing many households to shift to pen-based systems for small livestock farming.

Yaraş: Yaraş is also located within a heavily forested landscape. Residents benefit from the forest through the collection of non-timber forest products, such as medicinal herbs and mushrooms. These are generally collected for household consumption rather than for commercial sale.

Çakmak: Çakmak is another forest village where locals utilize forest resources in similar ways. The collection of herbs and mushrooms from nearby forests is common, and like in Yaraş, these activities are mainly for personal or household use, not as a primary source of income.

Kavakçalı: Kavakçalı is situated in a region with dense forest cover and residents engage in several forest-based activities. The most notable is beekeeping, with approximately 2,500 beehives operated by just 10 households, indicating a concentrated but economically significant activity. Additionally, forest lands are used as grazing areas for livestock, and residents collect non-timber forest products for household use.

In summary, although the type and intensity of forest use vary among these villages, forest resources play a significant role in supporting subsistence livelihoods and everyday needs in all four settlements.

According to responses collected during the March 2025 Muğla YEKA ESIA field study, participants expressed varied opinions on whether nearby forests could be affected by the Project:

13 respondents (38.2%) stated that they had no idea whether the forests would be affected. This group reflects either a lack of information about the Project's environmental scope or limited engagement in forest-related livelihoods.

7 respondents (20.6%) expressed the opinion that the forests could be impacted, signaling a moderate level of concern about potential changes to forest access or quality due to the Project.

14 respondents (41.2%) believed that the Project would not have any impact on the forests, which may reflect confidence in environmental safeguards or a perception of spatial or functional distance between Project activities and forest areas.

These findings highlight the need for improved information dissemination and stakeholder engagement, particularly in forest-dependent settlements. While the majority of participants either saw no impact or had no opinion, the presence of concern, even among a smaller group, should be considered in the assessment of social and environmental risk.

Moreover, the fact that nearly four in ten respondents (38.2%) reported having no opinion underscores the importance of addressing knowledge gaps during community consultation efforts.

TABLE 5-9 PERCEPTIONS OF PROJECT IMPACT ON FORESTS

Do you think these forests could be affected by the project?	Number of Households	Percent
No idea	13	38.2
Yes	7	20.6
No	14	41.2
Total	34	100

Source: Muğla YEKA ESIA Field Study Findings, March 2025

Among those who shared their views on how the Project might impact forests, the most commonly voiced concern was that forest products could decline due to a reduction in forested areas. Another frequently mentioned issue was the potential decrease in agricultural yields caused by dust generated during construction or operation. Some respondents also expressed concern that the Project might limit their access to forest areas, potentially affecting their ability to gather resources such as firewood, herbs, or mushrooms.

A considerable number of participants, however, did not express any opinion on the matter, which appears to be linked to their lack of involvement in forest-based activities. These respondents may not have felt directly impacted or informed enough to evaluate the potential effects of the Project on forest ecosystems.

5.3 ECOSYSTEM SERVICES

"Ecosystem services" refer to the different ways nature supports human well-being. All conditions, processes, functions, benefits and products that ecosystems provide for the survival or survival of people or communities can be defined as Ecosystem Services.

Benefits derived from ecosystems include food, water, clean air, medicinal raw materials, recreational and cultural values. These benefits of nature are vital for both humans and other living creatures on earth.

According to IFC PS6⁷, provisioning ecosystem services include,

- (i) agricultural products, seafood and game, wild foods, and ethnobotanical plants;
- (ii) water for drinking, irrigation, and industrial purposes; oach
- (iii) forest areas, which provide the basis for many biopharmaceuticals, construction materials, and biomass for renewable energy.

Moreover, in accordance with the PS6, ecosystem services are categorized into four groups.

- (i) Provisioning/ Supply services, which include products that people derive from ecosystems: food, clean water, wood and fiber, ornament used in landscaping, mineral raw materials, Pharmaceuticals, biochemicals.
- (ii) Regulatory services, which include the benefits that people derive from regulating ecosystem processes: pollination and seed dispersal, climate regulation, shading of trees, photosynthesis, natural disaster prevention, water purification, filtration of water in the soil, air quality regulation, reduction of diseases and pests, resistance to invasive species.
- (iii) cultural services, including intangible benefits that people derive from ecosystems: recreation, eco-tourism and cultural heritage.
- (iv) supporting services, including natural processes that sustain other services: habitat creation, soil formation, photosynthesis, nutrient cycle, water cycle.

PROVISIONING/ SUPPLY SERVICES AND REGULATORY SERVICES

Procurement/supply services include food, raw materials, decorative products, biomass fuels, fresh water, biochemicals/natural medicines. In line with the procurement services described in IFC PS 6, Project impacts within the scope of ecosystem services focus on beekeeping, forest harvesting (wood, food/plant harvesting), agricultural food production and livestock. In addition to this scope, regulating services, which include the benefits people derive from regulating ecosystem processes, include pollination and seed distribution, climate regulation, tree shading, photosynthesis, prevention of natural disasters, water purification, filtration of water in soil, regulation of air quality, reduction of diseases and resistance to pests and invasive species. In this context, these two ecosystem services are considered as integrated services in the Project area that are not separated from each other. Project impacts on these two ecosystem services are presented below.

Agriculture and Livestock: Agriculture and livestock farming are common livelihood components in the settlements of Turgut, Yaraş, Çakmak, and Kavakçalı, particularly under provisioning services. However, the scale and intensity of these activities vary across villages, and in most cases, they are practiced at a subsistence level, rather than as dominant economic sectors.

In Turgut, agriculture and livestock are relatively more widespread, with around 60 households engaged in cattle and small ruminant farming. Communal pasturelands—estimated at around

⁷ <https://www.ifc.org/content/dam/ifc/doc/2010/20190627-ifc-ps-guidance-note-6-en.pdf>

100 decares—are actively used, and concerns have been raised about the possible restriction of access due to Project-related land use changes such as roads or turbine installation.

In Yaraş, households maintain approximately 600 cattle and a significant amount of small ruminants. Barley and wheat are cultivated primarily as fodder. Residents emphasized concerns about the Eğridere spring, a vital water source for irrigation and livestock, which could be at risk of depletion or pollution.

In Çakmak, around 60 households raise approximately 120 cattle and 200 small ruminants. These activities are small-scale and directly tied to household consumption needs.

In Kavakçalı, agriculture and animal husbandry are not practiced intensively but serve primarily to meet household consumption needs. While around 100 cattle and 500 small ruminants are reported, the latter are raised by a limited number of households. Firewood from nearby forests is the primary source of heating.

Beekeeping: Beekeeping is a notable provisioning ecosystem service across all four villages, particularly in Turgut, Yaraş, and Çakmak:

Turgut has active beekeeping operations, with some beekeepers managing 500–600 hives. While the turbine site is not designated for pine honey production, some stationary and mobile apiaries are located within 2–5 km of the site.

Yaraş hosts both resident and mobile beekeepers. According to the village mukhtar, “thousands of hives” are placed seasonally in the area, and there is heightened concern about maintaining forest cover, which supports nectar availability.

Çakmak has approximately 500 hives, and beekeeping is considered an important economic activity for several households.

In Kavakçalı, around 2,500 hives are maintained by 10 households, suggesting a concentrated but potentially commercial-scale operation.

According to the EIA, the turbine locations, situated on windy ridgelines, are unsuitable for pollinator activity due to constant high wind exposure, which reduces flight range and foraging efficiency. No apiaries were observed at or near the turbine points. Nevertheless, concerns remain among communities that tree cutting, dust, and construction noise may harm bee populations and lower honey yields.

Beekeeping is seen as increasingly important in the region due to limited alternative livelihoods, an aging rural population, and the outmigration of younger residents. It offers relatively high returns with low labor input and helps sustain rural socio-economic resilience.

Forest Use and Non-Timber Products: Forests provide essential ecosystem services, including fuel, fodder, food, and construction materials. The EIA report identifies approximately 71.30 hectares of forest potentially subject to permitting, with an estimated 11,065 trees and 5,712 m³ of standing volume.

In Yaraş, the majority of households collect herbs and mushrooms, both for personal use and for sale in local markets. Access to forest resources is critical, and villagers expressed strong concerns about potential restrictions.

In Çakmak, forests are intensively used for firewood, wild plant collection, and mushroom gathering, which are seen as vital for both livelihoods and the continuation of traditional lifestyles.

In Kavakçalı, forests provide fuelwood for heating, and grazing occurs in forested or state lands. Forest dependency is high, even though economic reliance is low.

Fishing: Fishing is not a livelihood activity within the immediate Project AoI. Accordingly, no direct or indirect Project-related impacts on fishing activities are expected, and this is why fishing is not included in the impact assessment table.

In Kavakçalı, which is relatively rich in water resources, the Namnam River and its tributaries still support limited fish populations, although some degradation has been reported. Local residents have noted a significant decline in fish populations in recent years, mainly due to alterations of riverbeds related to the Namnam River rehabilitation project—not the Project itself.

In recent years, a small trout farm—currently non-operational—was located in the area and cultivated a cold-water trout species locally referred to as “freshwater salmon.” However, since the Namnam River is not located within the immediate turbine or construction zones, no Project-related impacts are anticipated on fish populations or aquaculture operations in the region.

Water resources for drinking and irrigation purposes: Access to water resources in the region is a vital and important issue for the sustainability of agricultural and livestock activities. Protection of water resources in the study area and ensuring the sustainability of water resources used by PAPs are important for the maintenance of ecosystem services. In terms of impacts on water resources, the Project should be evaluated under two different issues. The first of these are the impacts that may occur on source and surface waters due to blasting effects and the impacts on the quality of water resources due to dust.

During field interviews on the impacts of the Project, PAPs expressed the following concerns based on previous Project experiences:

TABLE 5-10 PAPS OPINION ON WATER RESOURCES FOR DRINKING AND IRRIGATION

Settlement	Project impacts on water pipes and sources
Yaraş	Water resources are highly limited in the region. The Eğridere spring, located near the Project AoI, has been identified as a important source of water for both human and livestock use, and concerns have been raised regarding the potential risk of contamination resulting from Project activities.
Turgut	The water infrastructure is weak, and water availability is particularly insufficient during the summer months. Currently, the village’s water supply is provided through the university’s piped water system, which is already operating at limited capacity. With the planned settlement of 300 workers in the village during the construction phase, the potential exacerbation of water shortages has emerged as one of the primary concerns.
Çakmak	The water infrastructure is inadequate, and local water resources are insufficient.

Settlement	Project impacts on water pipes and sources
Kavakçalı	The water infrastructure is adequate, and local water resources are sufficient. It is anticipated that the Project will not have any impact. Namnam Stream, a stream in the region, is not located within the immediate turbine or construction zones, and no Project-related impacts are expected on its operations.

Source: Muğla YEKA ESIA Field Study Findings, March 2025

These concerns stated by PAPs during the field work process are Project effects that have also been identified in the local EIA report. The effect of dust on water resources is described as follows:

Dust formation will occur in excavation operations to be carried out during the construction phase and due to the fractured-cracked, highly permeable structure of the region, it is possible that these particles will rapidly mix into the hydrogeological system from fractured-cracked and karstic cavities. Therefore, it is recommended that excavation and blasting operations (if performed) should not be postponed to December-March, when there is excess water.

CULTURAL SERVICE

Within the scope of ecosystem services, there are small-scale and underdeveloped cultural service branches within the EIA area. However, the tourism impact is limited within the Project AoI. It is important to determine whether the impact of more than one renewable energy project in the region will merge and become a dominant visual element and change the general perception of landscape character. However, the report states that no strategy can be implemented to reduce the visual impacts of the Project.

SUPPORTING SERVICES

Supporting services include natural processes that sustain other services such as habitat formation, soil formation, photosynthesis, nutrient cycle, water cycle. In this context, the Project's environmental impact assessment and biodiversity assessment primarily include these issues and mitigation measures in these areas.

Together with the impact analysis defined in these sections, the mitigation measures planned within the scope of ecosystem services will also ensure the sustainability of the components within the scope of Support services.

6. LIVELIHOOD IMPACT ASSESSMENT

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

6.1 PROJECT IMPACT SUMMARY

The ESIA conducted for the Project identified a range of social risks and impacts within the Project AoI. These include both direct and indirect livelihood-related impacts, especially affecting local communities engaged in agriculture, livestock grazing, and beekeeping.

The ESIA findings also reflect the expectations of affected communities for the prevention and mitigation of these impacts. Based on the assessment, the Project will implement a series of management plans to mitigate, monitor, and manage social risks in line with EBRD ESRs, IFC Performance Standards.

The following table summarizes the key social impacts identified in relation to land and livelihoods, their timing, and associated mitigation priorities:

TABLE 6-1 IDENTIFIED LIVELIHOOD-RELATED IMPACTS AND PROJECT PHASES

Impact Topics	Project-Affected People (PAPs)	Phase	Impact Description	Suggested Mitigation Measures
Construction related Impacts on Lands and Livelihoods	Local landowners and informal land users	Construction	<ul style="list-style-type: none"> • Damage to animals • Dust-related damage to cultivated lands and crops • Loss of income due to expropriation of grazing areas and olive groves (often used for secondary or tertiary income). • Reduced beekeeping productivity due to dust, noise, and vibration • Restricted access to pastures and forest resources • The ETL route passes through forest areas that are also customarily used by local residents for grazing. • During construction, temporary access restrictions are anticipated due to community health and safety (CHS) requirements • Such restrictions may involve controlled passage or slower access along forest roads. 	<ul style="list-style-type: none"> • All access roads and construction areas will be watered 3 times a day during the summer months to prevent dust impacts. If the contractor fails to implement dust control measures, any resulting crop losses should be fully compensated. • Economic displacement impacts will be minimized and mitigation measures specified in the Livelihood Restoration Plan will be implemented. • During the recruitment process, priority will be given to those who lose their livelihoods due to the establishment of the Project, within the scope of employment opportunities that may arise under the Project. • Beekeepers who are in the Project AoI or in areas that may be affected by dust and vibration will be identified before construction begins and hive transportation support will be provided by the Project. • All construction activities will be limited to the designated areas and the assets, crops, roads, etc. damaged during the construction and transportation process of the Project will be compensated by the contractors in line with the full replacement value. • Support programs given in Chapter 8 will be implemented in accordance with EBRD & IFC requirements to reduce and compensate for livelihood loss during the period when access to lands is restricted. • Efforts will be made to minimize impacts on forest lands by limiting the Project's construction area and promptly restoring damaged areas. • The Project stakeholder engagement plan will also include and define the consultation processes required for the Project's LRP. • A grievance mechanism will be established to address community concerns.

Impact Topics	Project-Affected People (PAPs)	Phase	Impact Description	Suggested Mitigation Measures
				<ul style="list-style-type: none"> Two Community Liaison Officers are employed to oversee the land acquisition process and address grievances within the community.
Impacts on Vulnerable Groups	Elderly (+65), chronically ill, and low-income PAPs	Construction and Operation	<ul style="list-style-type: none"> Disproportionate exposure to environmental impacts such as dust, noise, and vehicle traffic due to increased construction activities Difficulty in accessing services due to health conditions or advanced age Challenges in participating in information meetings or accessing grievance mechanisms Exacerbation of socio-economic vulnerabilities (e.g., restricted access to livelihood opportunities) 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 (especially Turgut, where worker camps are planned) 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 Türkiye, women are less likely than men to hold formal jobs or own land, making them more dependent on informal 	<ul style="list-style-type: none"> To ease the process of accessing municipal services and health facilities if needed Specific protection measures during land acquisition processes involving elderly or dependent PAPs Livelihood restoration support for households losing primary income sources. Project will provide support to the vulnerable households in the acquisition of new lands, especially when lands that are the source of income of elderly household members are expropriated. Women and vulnerable groups will be meaningfully involved throughout the entire plan development process.

Impact Topics	Project-Affected People (PAPs)	Phase	Impact Description	Suggested Mitigation Measures
			<p>livelihoods and family networks. Resettlement can disrupt these fragile support systems, leaving women with fewer resources to adapt.</p> <ul style="list-style-type: none"> • In rural Türkiye, 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 	

Impact Topics	Project-Affected People (PAPs)	Phase	Impact Description	Suggested Mitigation Measures
			services, and reduced community support, further limiting their ability to engage in income-generating activities	

ECONOMIC DISPLACEMENT IMPACT

There are currently no residential or commercial physical structures within the Project footprint. A goat shed within the Project area was voluntarily relocated by its owner. Hence, no physical resettlement will be required under the Project. However, temporary or permanent economic displacement may occur as a result of the following:

- Expropriation of agricultural lands and olive groves
- Temporary restricted access to seasonal grazing areas and forest lands during construction process
- Temporary loss of productivity due to construction-related dust, noise, or vibrations

Limitations on traditional land use practices, including both actual and perceived restrictions. Actual restrictions may arise from physical barriers, safety buffer zones, or changes in land classification.

Perceived restrictions are linked to current uncertainties regarding the final routing of the transmission line, particularly in forested areas, where the ETL may lead to limitations on forest use rights and access to forested land for grazing, firewood collection, or other traditional activities. These concerns are based on past experiences and lack of detailed, accessible information during the project planning phase.

Key Livelihood Mitigation Measures

The following measures, will be implemented by the Project to prevent, reduce, or offset negative impacts:

- Development and implementation of this LRP
- Meaningful engagement of women and vulnerable groups throughout the LRP process
- Prioritization of affected individuals for Project employment opportunities
- Provision of full compensation for all losses, including crops, trees, and economic activity
- Dust suppression measures (e.g., irrigation of access roads three times daily during summer)
- Compensation for assets or land access restrictions caused by construction
- Beekeeper identification and hive relocation support prior to construction
 - 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, 40 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 during LRP implementation, taking into account seasonal variations.
 - As the ETL alignment has been confirmed in October 2025, this verification should be repeated immediately prior to construction to ensure accurate identification and timely relocation or other support measures.
- Support for acquiring alternative land in cases of vulnerable household income loss
- Establishment of an effective grievance mechanism
- Appointment of two Community Liaison Officers (CLO) to monitor land-related grievances

- Inclusion of LRP consultation processes in the Stakeholder Engagement Plan (SEP)

TABLE 6-2 SOCIO-ECONOMIC IMPACTS – LAND AND LIVELIHOODS

Category	Construction	Operation	Decommissioning
Type of impact	Direct	None	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
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 PRIVATE LANDS

While the core infrastructure of the Project—particularly the wind turbines and the switchyard—will be constructed on state-owned forest land, certain auxiliary infrastructure components will intersect with privately owned agricultural land. These include the access road network and the ETL.

According to the Aydın-Muğla-Denizli 1/100,000 Scale Environmental Plan and the Project's Environmental Impact Assessment (EIA), 20 wind turbines are located on officially registered forest land, located in Kavakçalı neighborhood of Ula district. These lands are publicly owned as confirmed by the land registry records and do not include any private property in the core wind farm infrastructure area. However, in accordance with EBRD ESR 5/IFC PS5, the Project recognizes that state-owned lands may still be used informally or through traditional arrangements by individuals or households for livelihood activities such as seasonal grazing, fuelwood collection, sharecropping or beekeeping. Therefore, the presence of any formal or informal land users on these forest plots is further assessed through field studies, stakeholder consultations and verification with local forestry authorities. The Project will assess the potential livelihood impacts on these users within the scope of the methodology included in this LRP (with applications received through the GM, proactive stakeholder consultations) and support measures will be implemented as part of the LRP.

However, Project components such as access roads and the ETL corridor extend beyond the Project footprint, intersecting with a limited number of privately owned parcels, primarily used for agriculture and livestock grazing. This interaction introduces risks of partial or full land loss, potentially leading to temporary or permanent disruptions in livelihood activities. Mitigation and restoration measures are detailed in the ESIA under Chapter 7.3.4.

ACCESS ROADS AND ASSOCIATED PRIVATE LAND IMPACTS

The access road planned for the Project is expected to affect a total of 16 land parcels across Turgut and Çakmak neighborhoods:

- 8 parcels are privately owned and will be subject to partial expropriation in accordance with Turkish Expropriation Law No. 2942. 1 parcel had been directly acquired by the Project Company.
- 7 parcels are treasury-owned (public land) and will be accessed through the establishment of easement rights, without transfer of ownership.
- 1 parcel is forest-land.

Settlement distribution of affected parcels is presented below:

TABLE 6-3 AFFECTED LAND PARCELS BY ACCESS ROADS

Neighborhood	District	Privately Owned Parcels	Treasury Parcels (Easement)	Total Affected Parcels
Turgut	Ula	7	5	12
Çakmak	Menteşe	1	2	3

Source: Muğla YEKA ESIA Field Study Findings, March 2025

The 8 privately owned parcels are predominantly agricultural, comprising olive groves, dry farming areas (non-irrigated), and seasonal grazing lands. Field data confirms that these lands are often used interchangeably or simultaneously for both crop production and livestock activities, indicating a multi-functional livelihood dependency.

At this point, as an important indicator, it is anticipated that there may be a significant loss of livelihood in case the total lands, where the users of the lands carry out agricultural activities, are lost $\geq 20\%$. Therefore, the land acquisition originating from access roads is evaluated in this respect in the Table 6-3.

According to the loss rate assessment made on the parcel size, it was observed that only 3 parcels were expropriated over 20%. In this context, the total land sizes used by the users of these 3 parcels were also evaluated. In addition to the potential Project impacts on lands and livelihood, a specific impact area has been identified in Turgut during the social impact assessment process, where one of the access roads intersects with a structure used as a goat shed. Although the turbines themselves are located at a considerable distance from residences, the access road route passes in close proximity to residential buildings.

The goat shed is actively used for small-scale animal husbandry, which functions as a secondary or supplementary livelihood activity in the area.

The owner has voluntarily relocated the goat shed approximately 20 meters from its original location to allow for the Project's construction activities. To ensure the continued livelihood and

welfare of the affected household, the Project Company will construct a water collection pond and install water pipes for the owner's use once construction in the surrounding area is completed. These measures aim to maintain access to essential water resources for livestock and household needs.

The voluntary relocation has not formally been documented in terms of a signed agreement. Follow-up LRP measures will include: (i) verification that the relocated goat shed provides adequate shelter and space for livestock; (ii) confirmation that the newly established water pond and piping system are fully functional and meet the owner's requirements; (iii) monitoring of livestock health and productivity for at least one year post-relocation; and (iv) provision of any additional technical support or minor assistance if unforeseen livelihood impacts arise as a result of the relocation.

In contrast, residential buildings situated directly across the road from the shed will not be physically affected, as the road will be widened in the opposite (slope-facing) direction to avoid encroachment.

While no displacement of residential structures will occur, the partial impact on land and potential loss of a functional livestock shelter indicates a form of temporary economic displacement, which will require targeted mitigation.

TABLE 6-4 DETAILED PARCEL-LEVEL IMPACT OF ACCESS ROADS

Settlement	Block No	Parcel No	Total Parcel Area (m ²)	Area to Be Used (m ²)	% of Parcel Acquired	Total land of the user for agricultural activities	Loss ratio of used lands (%)	Intended Use	Land Type	Notes
Turgut	106	1	5,294.01	95.39	1.8	6800	1.4	Road	Agricultural Land	Road passes along the western edge of the parcel. 5.2 decares remain usable.
Turgut	103	10	5,582.96	1,229.43	22.0	8500	14.5	Road	Agricultural Land	Road passes along the southernmost edge of the parcel. 4.3 decares remain usable.
Turgut	103	3	6,511.60	1,079.69	16.6	15000	7.2	Road	Agricultural Land	Road passes along the southernmost edge of the parcel. 5.4 decares remain usable.
Turgut	103	2	6,158.41	691.13	11.2	6,158.41	11.2	Road	Agricultural Land	Road passes along the southernmost edge of the parcel. 5.4 decares remain usable.
Turgut	103	1	3,157.55	1,067.36	33.8	3500	30.5	Road	Agricultural Land	Road passes along the western edge of the parcel. 2 decares remain usable.
Turgut	102	2	2,638.49	358.6	13.6	4000	9.0	Road	Agricultural Land	Road passes along the western edge of the parcel. 2.3 decares remain usable.

Settlement	Block No	Parcel No	Total Parcel Area (m ²)	Area to Be Used (m ²)	% of Parcel Acquired	Total land of the user for agricultural activities	Loss ratio of used lands (%)	Intended Use	Land Type	Notes
Turgut	102	1	10,694.06	1,342.38	12.6	10,694.06	12.6	Road	Agricultural Land	Road passes along the western edge of the parcel. 9.3 decares remain usable.
Çakmak	170	4	1,921.36	977.86	50.9	1,921.36	50.9	Road	Agricultural Land	Road passes through the middle of the parcel. 609 m ² remains usable on the north, 334 m ² on the south.

Source: Muğla YEKA ESIA Field Study Findings, March 2025 and Project land acquisition data

6.2.1.1 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.

Indeed, current data confirms that in most cases for the Project land to be acquired only a part of the parcel is affected, while the rest remains arable. For 1 parcel, the Project access road passes through the middle of the parcel. As a result, 609 m² of land remains in the north of the land and 334 m² in the south, and these lands were included in the LRP to be evaluated as orphan or unusable land due to their unsuitable size for agricultural activities.

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.

TRANSMISSION LINE IMPACTS

The proposed ETL corridor will intersect with Yaraş neighborhood in the Menteşe district. Within this area, only one parcel will be affected, which is a private parcel. Easement rights will be established for this parcel without change of ownership, and no privately owned land is impacted along the ETL route.

Although physical displacement is not anticipated, temporary disruptions to access, particularly to pastures or cultivated plots, may occur during the construction period, especially during peak agricultural and grazing seasons. These disruptions will be closely monitored as part of the LRP implementation, and any necessary adjustments will be determined in consultation with affected land users.

6.3 AFFECTED USE OF FOREST, TREASURY AND COMMUNAL LANDS⁸

While the majority of the GAIA Wind Power Plant's core infrastructure—particularly turbine sites and the switchyard—is located on state-owned forest land, these areas, along with treasury parcels and communal lands, are seasonally and customarily used by local communities. These uses include livestock grazing, beekeeping, and firewood collection, especially during the summer and post-harvest periods.

Although such uses are generally undocumented and not formally recognized under Turkish expropriation law, both IFC PS5 and EBRD ESR5 require that Project-affected persons who lose access to natural resources essential for livelihoods be entitled to appropriate compensation or livelihood restoration assistance, regardless of formal land tenure status.

⁸ Communal land is collective land on which all persons have certain common rights, such as grazing their animals, collecting firewood, or cutting grass for fuel. It is registered with the village legal entity.

FOREST LANDS (KAVAKÇALI NEIGHBORHOOD)

All 20 confirmed turbine sites and the switchyard are located within officially registered state forest land in the Kavakçalı neighborhood. While there is no formal residential or agricultural use within the core sites, field consultations revealed that:

- Forest margins and adjacent areas are seasonally used by small-scale livestock keepers and beekeepers, especially during the post-harvest and summer months.
- According to the mukhtar in-depth interviews, in total three households engaged in livestock keeping and two in beekeeping reported using the forest-edge areas for grazing access and hive placement, respectively.
- These practices, though not formally permitted, are customary and sustained over time.
- Although turbine foundations are not expected to eliminate these uses directly, the construction of access roads, installation of infrastructure, and related movement restrictions or fencing may:
 - Disrupt existing informal access routes to forest grazing areas,
 - Increase safety or fire risks for forest users during construction,
 - Reduce the functionality or availability of forest-edge grazing or hive placement areas.

These potential restrictions on forest-based livelihood activities are assessed under this LRP. While the majority of the Project's footprint, particularly turbine locations and the switchyard, is located on state-owned forest land, these areas, along with adjacent treasury and communal lands, are subject to customary and seasonal use by local communities. Fieldwork conducted in March–April 2025, supplemented by consultations with village headmen (Mukhtars) and agricultural extension offices, confirmed that these lands are used primarily for the collection of non-timber forest products (such as mushrooms and oregano), seasonal livestock grazing, and beekeeping activities.

In total, approximately 705 households across the four Project-affected settlements (Yaraş, Turgut, Çakmak, and Kavakçalı) were reported to collect forest products for subsistence consumption. Beekeeping is another important livelihood activity, particularly in Yaraş (100 beekeepers, including 50 mobile), Turgut (30), Kavakçalı (20), and Çakmak (4), with most of these apiaries located along forest road corridors. While a significant number of households in Yaraş (200), Turgut (100), and Kavakçalı (80) are engaged in livestock farming, it was clarified during site visits that the actual forest areas to be impacted by the Project are not directly used for grazing purposes by these households. In Çakmak, only 5 of 60 households were reported to use forest land for grazing.

These livelihood activities are typically informal and are not formally registered under Turkish expropriation law. Nevertheless, both IFC PS5 and EBRD ESR5 recognize the rights of individuals and households who lose access to natural resources critical to their subsistence or income generation, regardless of formal legal title. Therefore, Project-affected resource users are eligible for compensation and/or livelihood restoration assistance.

TABLE 6-5 STATE FORESTS USAGE INFORMATION

Settlement	Purpose of using state forests		
	For picking mushroom, oregano etc. for subsistence consumption seasonally (household)	Cattle grazing/ utilization for animal feed (household)	Beekeeping (beekeeper)
Yaraş	450	There are 200 households engaged in livestock farming, but the Project area (state forests) is not directly used areas	100 (50 of them mobile)- (The lands on the forest road are mainly used)
Turgut	125	There are 100 households engaged in livestock farming, but the Project area (state forests) is not directly used areas	30 (The lands on the forest road are mainly used)
Çakmak	50	5 (in 60 households)	4 (The lands on the forest road are mainly used)
Kavakçalı	80	There are 80 households engaged in livestock farming, but the Project area (state forests) is not directly used areas	20 (The lands on the forest road are mainly used)

PRIVATE LAND (YARAŞ)

One private parcel along the ETL route in Yaraş (407/1) is classified as private land. The parcel is affected by the transmission cable according to information provided by the Client.

TREASURY LANDS (TURGUT AND ÇAKMAK)

A total of seven parcels located along the access road alignment (in Turgut and Çakmak) are classified as treasury-owned land. These parcels will be accessed through the granting of easement rights, with no transfer of ownership or formal expropriation.

However, field assessments confirmed that:

- Many of these parcels are currently used for seasonal livestock grazing, serve as access paths to agricultural or forested areas, or function as informal connectors between household parcels.

- These uses are undocumented and thus not eligible for compensation under Turkish law, despite being economically and culturally significant.
- During the construction phase, fencing, grading, or movement of heavy equipment may temporarily block access, particularly affecting pastoralist households in Turgut and Çakmak, who rely on seasonal mobility.

As such, these communal and customary land uses are evaluated in this LRP and included in the entitlement framework for livelihood support and access restoration under Chapter 8.

The construction phase of the Project, including turbine installation, ETL construction, access road upgrades, and the intensive use of unpaved roads by heavy vehicles, may result in unintentional but tangible damage to community assets and agricultural productivity.

These impacts are distinct from land acquisition-related losses and may affect both private and informally used public lands situated near the construction zones. While such impacts are typically temporary, they have the potential to cause income losses, production disruption, or physical asset damage for affected households.

TABLE 6-6 TYPES OF ANTICIPATED DAMAGE AND IMPACTS

Damage Type	Description
Dust-Related Crop Loss	Construction traffic and earthworks may generate significant dust, especially on unpaved roads, leading to reduced olive/crop yields and fruit drop.
Damage to Productive Trees	Trees near road alignments or work sites may be unintentionally harmed by grading, soil compaction, or contact with machinery.
Damage to Agricultural Assets	Irrigation systems, fences, retaining walls, terraces, or agricultural tools may be damaged by equipment movement or road widening.
Beekeeping Disruption	Dust and vibration may disrupt hive activity; accidental relocation, heat exposure, or hive damage may result from construction proximity.
Soil Compaction or Runoff	Vehicle movement may compact soil or alter water runoff patterns, affecting field conditions and seed germination in nearby plots.

6.4 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 line with IFC PS5 and EBRD ESR5, vulnerable groups within the Project AoI have been identified using field-based data, participatory tools, and community profiling conducted in March 2025 across the neighborhoods of Turgut, Çakmak, Yaraş, and Kavakçalı.

The table below summarizes the number of individuals or households identified as vulnerable across the four neighborhoods:

TABLE 6-7 VULNERABLE HOUSEHOLDS

Vulnerability Category	Turgut	Çakmak	Yaraş	Kavakçalı
Illiterate adults	50	15	50	0
Female-headed households	50	6	50	15
Households dependent on public aid	10	3	15	0
Persons with chronic illness or bedridden	2	2	5	0
Elderly (65+) living alone	10	3	15	15
Persons with physical or mental disabilities	5	3	10	6
Unemployed or low-income household heads	50	2	400	0
Seasonal workers	50	0	50	0
Total	227	19	545	21

Source: Muğla YEKA ESIA Field Study Findings, March 2025

The number of vulnerable households presented by category in the table includes overlaps, as some households experience multiple forms of vulnerability simultaneously. For example, a household may be both female-headed and dependent on public aid. Such overlapping vulnerabilities are particularly common in households with people with physical or mental disabilities or elderly individuals (65+) living alone. Therefore, the category-based figures reflect the prevalence of each specific vulnerability type but may not correspond exactly to the total number of unique households. In addition, vulnerability data were collected through field-based interviews with mukhtars and households, based on self-reporting and verified through cross-checking. As some households may not have disclosed all aspects of their vulnerability, a limited degree of underreporting may exist.

Although large-scale commercial farming is limited in the AoI due to rugged topography and dominance of forest land, many vulnerable households rely on small-scale agriculture, livestock grazing, beekeeping, and seasonal labor. The 2021 wildfire further reduced the productivity of forest-adjacent areas, increasing dependency on remnant arable plots.

Key observations include:

- Elderly-headed households are the primary group maintaining subsistence agriculture and small ruminant grazing. These activities are often non-mechanized and rely on informal forest and pasture access.
- Women engage in informal income-generating tasks (e.g., poultry, seasonal harvest labor), but often lack formal land tenure or decision-making authority.
- Seasonal workers, many of whom lack stable income, may lose access to temporary jobs related to olive harvesting or animal care as lands become fragmented or partially expropriated.
- The youth population has largely migrated towards tourism and service sectors, leaving rural production to more vulnerable, aging populations.

As a result, any restriction of access to land or natural resources, including those due to construction activities, access road improvements, or utility installations, disproportionately affect these already fragile livelihood systems.

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 preliminary assessment of assets of PAPs was completed for the project area – this was March 2025 (as documented during the Muğla YEKA ESIA field study).⁹ 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 the 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 Performance Standard 5, 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.

⁹ Prior to starting the expropriation process, for all parcels within the project area, Enerjisa Üretim commissioned valuation reports prepared by independent valuation institutions which are licensed by the Capital Markets Board (SPK). Reports have not been provided or reviewed by ERM.

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 preliminary assessment of assets 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 7-1 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 following 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 7-2 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 TEAİŞ (for ETL)	~8 land parcels
≥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	~80 households (eligible for TLS)
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	~20 households (~100 tons fodder)
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	~1,200 trees (eligible for compensation)

Impact Type	Eligible PAPs	Entitlement	Delivery Method	Responsible Party	Estimated Number of PAPs/Assets
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	~150 assets
Disruption of seasonal grazing or hive placement in forest/treasury land	Informal users or heirs	TLS, in-kind support, hive relocation assistance	Community-validated list; in-kind or cash	Enerjisa	~1,000 beehives to be relocated
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 households
Dust-related crop yield loss	Cultivators near unpaved roads	Compensation based on reduced productivity	Yield monitoring and seasonal payment	EPC Contractor or Enerjisa	TBD (case-by-case)
Lack of formal tenure or shared use of family land /affected trees	Informal users or heirs	Inclusion in TLS and other LRP support based on use verification Cash compensation for affected crops/trees	Verified through field visits and community input	Enerjisa	~1,200 trees (included in TLS total)
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	~60 vulnerable households
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	~20 training sessions (~100+ 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	~8 land parcels

8. INTERIM IMPLEMENTATION – MEASURES UNDERTAKEN TO DATE

While the LRP was being developed, Enerjisa Üretim initiated a number of interim activities aimed at supporting affected households and mitigating potential livelihood impacts. This chapter summarizes the measures implemented to date, highlighting actions that have already contributed to restoring or stabilizing livelihoods prior to the full implementation of the LRP. The information presented here provides context for the current status of livelihood support and forms the baseline for monitoring and integration with the forthcoming plan activities.

8.1 RELOCATION OF SECONDARY ASSETS

In Turgut, the social assessment has identified a shed used for animal husbandry activities, namely goat farming, that was impacted by the Project. The shed is actively used for small-scale animal husbandry, which functions as a secondary or supplementary livelihood activity in the area.

While the LRP was under development, Enerjisa Üretim engaged with the owner of the asset, who has meanwhile voluntarily relocated the goat shed approximately 20 meters from its original location to allow for the Project's construction activities. To ensure the continued livelihood and welfare of the affected household, the Project Company will construct a water collection pond and install water pipes for the owner's use once construction in the surrounding area is completed. These measures aim to maintain access to essential water resources for livestock and household needs.

The voluntary relocation has not formally been documented in terms of a signed agreement. Follow-up LRP measures will include: (i) verification that the relocated goat shed provides adequate shelter and space for livestock; (ii) confirmation that the newly established water pond and piping system are fully functional and meet the owner's requirements; (iii) monitoring of livestock health and productivity for at least one year post-relocation; and (iv) provision of any additional technical support or minor assistance if unforeseen livelihood impacts arise as a result of the relocation.

8.2 LAND PARCELS ACQUISITION

A land parcel located in Çakmak was acquired by the Project through a willing buyer–willing seller arrangement (WBWS). The Project impacts would have resulted in the division of the parcel by an access road, which has made continued cultivation of the remaining land less preferable and economically viable for the owner.

As part of the LRP implementation process, all WBWS agreements, including this transaction, will be subject to a thorough verification process to ensure compliance with applicable national laws and international standards on land acquisition and livelihood restoration. This verification will include a review of supporting documentation (such as sale agreements, proof of payment, and consent forms), confirmation that transactions were voluntary and based on informed decision-making, and direct consultations with affected households to confirm that they fully understood and agreed to the terms of sale. Should any discrepancies or non-compliance be identified during this process, appropriate corrective measures, such as top-up payments or

additional livelihood assistance, will be implemented to ensure that all affected persons are treated fairly and in line with the LRP's objectives and standards.

8.3 ASSET COMPENSATION FOR INFORMAL USERS

In Turgut Village, an informal user was identified on parcel 138/2, where four fruit trees were located within the affected area. These trees have since been cut down as part of Project activities. Enerjisa compensated the informal user for the loss of the trees in accordance with government-stipulated rates, which took into account the type and maturity of each tree. Documentation, including the compensation invoice and photographic evidence, was provided to the ERM for review and verification, ensuring transparency and compliance with the Project's livelihood restoration and asset compensation requirements.

It is recommended that the case of the informal user on parcel 138/2 in Turgut Village be included in the verification and monitoring process to ensure alignment with international standards such as IFC Performance Standard 5 and EBRD ESR5. Although compensation for the four fruit trees was provided in accordance with government rates, the Project should follow up through direct consultation to confirm that the compensation adequately addressed any loss of livelihood or income. If the verification identifies that the compensation was insufficient or that the individual's livelihood has been negatively affected, the Project should consider providing supplemental livelihood restoration support, such as replacement saplings or assistance for alternative income-generating activities. All follow-up actions, consultations, and outcomes should be documented as part of the LRP's monitoring and reporting framework to ensure transparency and compliance with international best practice.

9. LIVELIHOOD RESTORATION PROGRAMME – FUTURE WORKS

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.

9.1 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 9-1 below.

TABLE 9-1 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	Pre-construction & construction	Project, Expropriation Agency (TEİAŞ), Real Estate Valuation Firms,	Priority given to timely disbursement before construction start, Real-time tracking via GRM;

Component	Target Groups	Delivery Timeline	Responsible Parties / Cooperation Needs	Inclusion Considerations
	damages (e.g. crops, fences)		Construction Contractor, Supervision Team, Social Team	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. This includes eligible informal users losing access to forest or pasture land. *Timing:* From pre-construction through the operation period (to bridge the 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 to ensure these households recover adequately.

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

9.1.1 CASH COMPENSATION PAYMENTS

9.1.1.1 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.

9.1.1.2 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, olive trees (and their annual yield of olives) serve as secondary or tertiary income sources. 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 9-2 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 Verification and Update (if needed)																																		
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.																																	

9.1.2 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 9-3 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.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
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9.1.3 MEASURES DURING CONSTRUCTION

9.1.3.1 DUST CONTROL AND CROP IMPACT MITIGATION

Construction activities (such as earth moving, use of unpaved access roads by trucks, and excavation) will generate dust. In an agricultural setting dominated by olive groves and other crops, excessive dust can coat leaves and reduce photosynthesis, potentially leading to lower yields or quality (e.g. olives dropping prematurely or producing less oil). The Project is implementing dust mitigation measures – primarily regular watering of active roads and work sites to suppress dust – to reduce this impact.

If despite these efforts dust causes a measurable reduction in crop yield for nearby PAPs, the Project will compensate farmers for the loss in productivity. Yield reductions will be assessed by comparing harvest outcomes in dust-affected areas to those in unaffected areas (or to baseline yields). Farmer testimonies and local agricultural expert input will support these assessments. Any confirmed losses (for example, a drop in olive yield attributable to construction dust) will be monetized based on market prices and paid to the cultivator. The Project's goal is to ensure that farmers are not financially worse off due to temporary environmental impacts like dust.

9.1.3.2 COMPENSATION FOR CONSTRUCTION-PERIOD DAMAGES

In addition to planned land acquisition, the Project acknowledges that unintentional damage may occur during construction (despite mitigation efforts). This can include damage to:

- Standing crops (e.g. olives knocked from trees, or crops trampled by machinery).
- Productive assets and infrastructure such as low stone walls, fences, farm sheds, livestock enclosures, irrigation ditches or hoses, and other improvements that communities or PAPs have established.
- Soil and land resources (for instance, if heavy equipment causes compaction or erosion on adjacent fields).

The Project will implement a damage compensation program for any such construction-related impacts. All incidents of damage will be documented through on-site visual assessments by the Project's environmental/social staff or the Contractor's team, with photo records and GPS coordinates for accuracy. PAPs are also encouraged to report damages through the grievance mechanism or directly to CLOs so they can be verified promptly.

Once documented, the Project will either repair the damage or provide cash compensation at full replacement value. For example, if an irrigation line is cut, the Contractor can fix or replace it; if a fence is broken, materials and labor to rebuild it will be provided (or the equivalent cost paid to the owner). Crop damage will be compensated in cash as described above (based on yield loss). The responsibility for financing these repairs/compensations will lie with the party at fault – in many cases the Contractor (if damage is due to construction works), under the supervision of the Project. The LRP budget includes a contingency fund specifically for construction damage compensation to ensure funds are available. The guiding principle is that PAPs will be compensated for any project-induced damages immediately, rather than having to wait until end of construction.

In parallel, the Project will take preventive measures to minimize incidental damage: for instance, implementing dust control by watering roads (to prevent dust from settling on crops),

installing temporary fences or warning tape to delineate work areas, and putting up signposts to redirect vehicles away from sensitive fields.

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.

9.1.3.3 INHERITANCE RELATED MEASURES

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.

During the compensation process, some heirs experienced delays in receiving their entitlements due to the time required for completing legal inheritance declaration procedures. To address this issue, the project's legal team proactively supported affected households by facilitating the preparation and submission of inheritance declarations. These documents were obtained by the project's lawyer(s) and subsequently delivered to the rightful heirs through the Community Liaison Officers (CLOs). To ensure transparency and equitable access to information, clear instructions—accompanied by photographs illustrating the steps for obtaining payments from the court—were posted in a visible location at the Turgut Village coffeehouse. These measure aimed to keep all eligible heirs informed about the process and required documentation. They will continue to be applied where similar cases are identified, and will ensure proper documentation and monitoring.

As a result of these actions, heirs are now well-positioned to complete their applications and receive their compensation payments in a timely and transparent manner, ensuring the continuity of the livelihood restoration process and upholding the project's commitment to fair and inclusive implementation.

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.

9.1.3.4 SUPPORT FOR ANIMAL GRAZING

In villages like Turgut and Çakmak, it is common for households to use olive groves for dual purposes: harvesting olives in autumn and then allowing sheep/goats to graze on the grass and vegetation under the olive trees after the harvest. This traditional integration of crop and livestock activities is important for supplemental income and feed.

Project construction, particularly road works or excavation for turbine sites, may temporarily restrict access to some of these olive grove areas and disrupt seasonal grazing patterns. The potential impacts include: loss of free grazing areas (forcing farmers to buy feed), increased expenditures for feed or transport, and possibly having to reduce herd sizes if grazing is severely limited.

To mitigate these impacts, the Project will provide seasonal fodder support and related assistance to affected livestock keepers:

- During the grazing season when access is blocked, the Project will distribute livestock feed (hay, silage, concentrate feed, etc.) to the affected herding households to substitute for lost pasture. The quantity will be based on herd size and the length of access restriction.
- If needed, the Project will also offer transport assistance to help herders move their animals to alternative grazing areas farther away. For example, if a flock must be relocated across a construction corridor to reach open pasture, the Project can arrange trucks or safe passage for a limited period.
- The Project will work with community leaders and herders to identify temporary alternate grazing arrangements. In some cases, nearby lands not under construction might be made available, or construction schedules could be adjusted (e.g. pausing work during critical grazing months) to allow periodic access. Where feasible and safe, rotational access may be arranged – for instance, opening certain work areas on weekends for supervised grazing if construction is paused.

All multi-use parcels (olive groves that double as pastures) will be closely monitored throughout construction so that any emerging issues with livestock feeding are caught early. The support will be flexibly tailored to the timing and severity of disruption – for example, if grazing is lost for an entire winter, a more extensive fodder provision program will be deployed, whereas a short two-week blockage might require only minor support. By providing feed and logistics help, the Project ensures that herding households do not suffer livestock losses or financial burden due to the temporary loss of grazing land.

9.1.3.5 SUPPORT FOR BEEKEEPING

Beekeeping is another livelihood in the project region, often practiced by placing beehives in forested or rural areas that offer good foraging. Project works could potentially disturb some apiary locations (for example, if hives are near a new access road or turbine location). To support local beekeepers, the Project will implement measures such as:

- **Hive Relocation Assistance:** If construction activities are too close to existing beehive locations, the Project will assist beekeepers in moving those hives to safe, suitable locations away from the disturbance. This includes identifying alternative sites with adequate forage and water, and providing transportation for the hives. Relocation will be timed to avoid critical periods in the beekeeping calendar as much as possible. 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.

- **Technical Training for Beekeepers:** The Project will offer training sessions on maintaining hive health during stress and on diversifying beekeeping products or techniques. This can help beekeepers improve resilience (e.g., managing pests or diseases that may arise from moving hives) and explore opportunities like queen rearing, pollen harvesting, or other honey products to enhance income.
- **Compensation for Disruption:** If beekeepers experience a drop in honey production or other losses directly due to construction (for instance, if heavy machinery activity causes bees to abandon hives or reduces honey yield in that season), the Project will compensate for the lost yield based on average production and market prices for honey.

By actively engaging with beekeepers, relocating hives when necessary, and compensating any losses, the Project will help ensure that apiculture livelihoods are preserved and can continue to thrive post-project.

TABLE 9-4 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.																			

9.1.4 TRAINING AND CAPACITY-BUILDING

Feedback from community consultations highlighted a desire to improve agricultural productivity and diversify livelihoods, especially among youth and women who may be less interested in traditional farming under current conditions. As part of the LRP, the Project will provide agricultural training programs to support sustainable livelihood restoration and broader community development:

Topics likely to be covered include:

- **Improved livestock rearing:** for small ruminants (sheep/goats) and possibly cattle – focusing on feed management, breeding, and veterinary care to increase productivity of herds.
- **Beekeeping (apiculture) and product diversification:** training both existing beekeepers and newcomers (youth who may want to start) on hive management, honey production best practices, and diversifying into beeswax, propolis, or other bee products.
- **Marketing and cooperative development:** basic business skills to help farmers market their olive oil, honey, or other products better – possibly through forming or strengthening local cooperatives, value-add processing, branding, or connecting to buyers/tourism markets.

The Provincial Directorate of Agriculture and Forestry (İl Tarım ve Orman Müdürlüğü), local agriculture extension services, and/or experienced NGOs or consultants will be engaged to conduct these trainings, ensuring they are technically sound and relevant. Training sessions will be scheduled at convenient times (often post-harvest or off-season) and in locations accessible to the villagers.

Priority enrollment will be limited to Project Affected Persons (PAPs), specifically households impacted by the defined project impacts such as land acquisition, dust, heavy vehicle traffic, or land-use restrictions etc. Within this group, vulnerable households (e.g., unemployed youth, women who lost livelihood sources) will be given first priority. However, other interested community members will also be welcomed to maximize local development impact. By improving skills and knowledge, the Project helps PAPs not only restore what was lost but potentially enhance their livelihoods beyond pre-project levels (for example, by getting higher yields or new income streams). These capacity-building efforts contribute to the sustainability of the LRP outcomes in the long run.

In addition to the above measures, the entitlement matrix (see earlier section) provides a comprehensive summary of all compensation and assistance provisions under the LRP, including any remaining categories not detailed here. Each of these programs will be implemented with careful monitoring and adjusted as needed based on PAP feedback (as described in the Monitoring & Evaluation section). The following sections describe how the LRP will be implemented and managed, including scheduling, organizational responsibilities, stakeholder engagement, budget allocation, and monitoring.

TABLE 9-5 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.																							

9.1.5 OTHER SUPPORT MEASURES

9.1.5.1 SUPPORT FOR INFORMAL LAND USERS

The LRP explicitly includes informal land users so that people without formal title are treated fairly. In the project-affected communities, many residents use land that they do not officially own – for instance, grazing animals on treasury (public) land or forest areas, cultivating family land that is not formally divided, or gathering resources from common lands. Women often engage in informal livelihood activities like small-scale poultry or collecting olives on extended family lands without written agreements.

The Project will recognize and support these de facto land users. If an informal user's access to land or resources is curtailed by the Project, they will be entitled to livelihood restoration assistance comparable to that offered to formal landowners/users. The exact support will depend on the nature of their use, but may include:

- Transitional livelihood support (TLS) payments if they lose a significant portion of their grazing area or other livelihood resource.
- In-kind assistance such as fodder for those who grazed animals, or materials to re-establish bee hives for informal beekeepers (see below).

To qualify, the informal use must be genuine and established. This will be verified through community validation (e.g. confirmation from the muhtar or neighbors that the person has been using that land for years) and an assessment of how critical that use is to their livelihood (e.g. number of animals grazed, proportion of income or subsistence from that activity). By extending entitlements to informal users, the LRP ensures that lack of legal title does not leave someone unsupported if their livelihood is affected.

9.1.5.2 TRANSITIONAL LIVELIHOOD SUPPORT (TLS)

Transitional Livelihood Support is a core financial assistance mechanism in the LRP. TLS is essentially a temporary support payment (or in-kind support package) given to PAPs who suffer a major loss of productive assets or income sources so that they can maintain their livelihood during the interim period of disruption. In this Project, TLS will be provided to those who meet specific eligibility triggers, notably:

- **Land-based livelihoods:** Private landowners or users (including informal users) who lose their productive land area due to acquisition. Losing a significant portion of land can directly reduce a household's agricultural output and income, so TLS will offset the deficit while they adjust.
- **Resource users:** Persons (e.g. forest users, grazers, beekeepers) who lose access to state-owned forests, pastures or other communal resources that are critical to their livelihood (even if the physical land loss is not theirs). For example, if the project fences off an area of forest previously used for grazing or foraging, those users qualify for TLS.

A preliminary analysis of land acquisition data (as of the time of LRP preparation) identified a few PAPs likely to qualify. For instance, in Turgut neighborhood two landowners are expected to lose their land (one around 22%, another around 34% of total holding). These cases illustrate how TLS criteria capture severe impacts. During LRP implementation, the Project will verify the final list of TLS-eligible households once all parcels to be acquired and their users

are confirmed. This will involve completing the land acquisition records for each parcel and consulting with each affected household to understand all sources of livelihood and the proportion affected.

In the interim period prior to the finalization of the LRP, one qualifying household land (1 private parcel for the access road) was acquired by the Project through willing buyer–willing seller arrangements. As part of the LRP implementation process, all WBWS agreements will be subject to thorough verification to ensure that they were conducted in accordance with applicable national laws and international standards on land acquisition and livelihood restoration. Verification will include a review of supporting documentation (such as sale agreements, proof of payment, and consent forms), confirmation that transactions were voluntary and based on informed decision-making, and direct consultations with affected households to confirm that they fully understood and agreed to the terms of sale. If any discrepancies or non-compliance are identified during this verification process, corrective measures, including possible top-up payments or additional livelihood assistance, will be implemented to ensure that all affected persons are treated fairly and in line with the LRP’s objectives and standards.

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 (m²)	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 m²	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 m²	10	2–3 Parcels	10			Rented	0	Business	10	Other than land-based livelihood	0		
40–50%	20	5,000–7,500 m²	15	3–4 Parcels	15			Field	5						
50–60%	25	7,500–10,000 m²	20	4–5 Parcels	20			Garden	10						
70%+	30	10,000+ m²	25	5+ Parcels	25			Plot (zoned 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.

Next Steps for TLS: At the time of this LRP, the exact number of TLS recipients is being finalized. The Project commits to updating the TLS section in the final LRP once full parcel acquisition data is available and all affected users (including informal ones) are identified, so that no eligible household is missed. This is in line with IFC PS5/EBRD ESR5 requirements to cover all economically displaced persons, not only those with formal title. In summary, TLS will ensure that those suffering major livelihood hits have a financial cushion to carry them through the transition period, preventing a slide into poverty while longer-term measures (like new land or new income activities) take effect.

9.1.5.3 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 below present an overview of vulnerable group support measures.

TABLE 9-6 VULNERABLE GROUP ENGAGEMENTS FOR LRP SUPPORTS

Vulnerable Group	Engagement/Access Measures
Female-headed households	Gender-sensitive consultations; FDGs, home visits
Elderly-headed households (65+)	Home-based consultations; visual/verbal information delivery
Persons with disabilities	One-on-one support; referrals to services

Vulnerable Group	Engagement/Access Measures
Illiterate adults / low-literacy	Use of visual materials; verbal explanation of rights

TABLE 9-7 VULNERABLE GROUPS – ENTITLEMENTS UNDER LRP (LIVELIHOOD RESTORATION MEASURES)

Vulnerable Group	LRP Entitlement Measures
Female-headed households	Priority in compensation; in-kind support (e.g. poultry inputs, seeds)
Elderly-headed households (65+)	Transitional support aligned with agricultural seasons
Households on state aid	Supplemental livelihood package (based on verified impact)
Persons with disabilities	Adjusted compensation delivery method
Seasonal/irregular workers	Priority in short-term employment; access to skills training
Informal users of state/forest land	Entitlement to compensation; in-kind support for resource loss
Unemployed/low-income heads	Fast-tracked eligibility for TLS; linkage to contractor jobs

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 6.6) 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 9-8 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 understand the input costs and professional fees associated with those measures.																													

9.2 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 9-9 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												

10. 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.

10.1 KEY PROJECT STAFF

Table 10-1 below presents the key Project staff and their roles and responsibilities in the LRP development and implementation.

TABLE 10-1 ROLES AND RESPONSIBILITIES

ESMS Team Member / Task Force	E&S Related Roles and Responsibilities
Gaia 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

ESMS Team Member / Task Force	E&S Related Roles and Responsibilities
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.
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.

10.2 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.

11. 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.

11.1 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

11.2 STAKEHOLDER CONSULTATION ACTIVITIES

Following approval of the LRP:

- Community meetings will be held in each affected neighborhood (Turgut, Çakmak, Kavakçalı, and Yaraş) 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.

11.3 GRIEVANCE MECHANISM

The Project Grievance Mechanism, 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.

11.3.1.1 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 neighborhood (Turgut, Çakmak, Kavakçalı, Yaraş, etc.). In these village 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 or agricultural cooperative). This way, community members can refer back to LRP information at any time. Mukhtars (village heads) 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.

11.3.1.2 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.

11.3.1.3 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.

11.3.1.4 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.

11.3.1.5 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.

11.3.1.6 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., **Muhktars (village headmen)** of each affected settlement, who are key liaisons and can help verify information and mobilize people for meetings; the **Chamber of Agriculture (Ziraat Odası)** 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** – primarily the **CLO team** and the contractors' HSE staff as mentioned, but also the construction teams, to ensure all are pulling in the same direction.

The Project will establish regular communication with these actors. For example, a coordination meeting might be held monthly with the muhktars 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.

12. 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.

12.1 KEY BUDGET COMPONENTS

Key budget components include the following:

- Cash Compensation for Private Land Loss
- Compensation for 8 affected privately owned parcels.
 - Full replacement value based on independent valuation.
 - Disbursed via official channels in coordination with DSİ.
- 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 in Turgut and Çakmak.
 - 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 İl Tarım Müdürlüğü 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.

12.2 BUDGET ALLOCATION AND MANAGEMENT

The Project Sponsor 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 productive land) 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 – Project Sponsor 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. Table 12-1 below presents the estimated LRP budget.

The compensation for private land acquisition is calculated as the following considering the total area of the eight plots is 41,599 square meters; the total expropriated land area is 6,842 square meters. The unit price per square meter was determined and paid as 1,430 TL. Based

on these figures, this budget was determined to compensate for the remaining areas of the expropriated lands that have become unproductive, have had their water or access cut off, have been damaged, or have shrunk to the point of being unsuitable for cultivation. Furthermore, for these reasons, unavailable lands have become unusable, and additional expropriation requests are requested.

Half of the total land affected by expropriation, 22,000 square meters, was determined as the projected unavailable land size for calculating this budget. The maximum square meter size that can be budgeted within this scope was determined to be half of the total land area (based on the KMZ and maps). This budget is the maximum amount. It will be updated after the November fieldwork, following the final fieldwork and current Project data. In this context, the private land acquisition compensation budget item can be estimated at 31,460,000. It should be noted that the budget will be updated following further socioeconomic surveys covering the ETL and access road.

TABLE 12-1 LRP BUDGET ESTIMATE

Budget Item	Unit Cost (TRY)	Estimated Quantity	Subtotal (TRY)
Compensation for Private Land Acquisition	1,430 TRY/m ²	8 parcels (≈22,000 m ² total)	31,460,000
Compensation for Trees and Crops (e.g. olives)	1,500 TRY/tree	~1,200 trees	1,800,000
Compensation for Unregistered Assets	Lump-sum (≈10,000 TRY/asset)	~150 assets	1,500,000
Transitional Livelihood Support (TLS) for Informal Users & vulnerable households	10,000 TRY/household	~80 households	800,000
Fodder Support for loss of grazing (animal feed)	2,500 TRY/ton	~100 tons	250,000
Beehive Relocation Support	1,000 TRY per hive move	~1,000 hives	1,000,000
Agricultural & Livelihood Trainings	15,000 TRY/session	20 sessions	300,000
Additional Vulnerability Assistance (in-kind or financial aid)	7,000 TRY/household	60 households	420,000
Construction Damage Compensation Fund	Lump-sum (contingency)	<i>Contingency reserve</i>	1,200,000
Grievance Mechanism Operational Costs	10,000 TRY/month	24 months	240,000
Monitoring and Evaluation (M&E)	25,000 TRY/quarter	8 quarters	200,000
Total Estimated Budget	–	–	39,170,000

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.

13. 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.

13.1 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

13.2 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. DSI), 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.

13.3 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 13-1 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 access to previous grazing/resource areas Monitoring of livestock health and productivity for at least one year post-relocation

13.4 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 13-2 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	Project Sponsor + Senior Management

13.4.1.1 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.

13.4.1.2 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.



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