

# **NON-TECHNICAL SUMMARY**

## **BALABANLI EXT (PHASE II) WPP**



**MAY 13, 2024**  
**BORUSAN ENBW ENERJİ YATIRIMLARI ÜRETİM A.Ş.**

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## 1 What is this document?

This Non-Technical Summary (NTS) document provides an overview of the Balabanlı Ext-Phase II Wind Power Plant (WPP) developments based on the proceeds of financing loan to Borusan EnBW Enerji Yatırımları ve Üretim A.Ş. ("Borusan EnBW Enerji" or "BEE"). A summary of relevant potential environmental and social issues and impacts are provided related to the construction and operation of the proposed project that is presently at a total installed capacity of 35.4Mwe/35.4MWm. Appropriate measures to mitigate the key adverse environmental and social impacts that may arise during the construction and operation of the project activities are also presented within this document.

## 2 The Project Summary

BEE has been operating Balabanlı WPP with 25 turbines (22 turbines x 2.3MWm/2.3Mwe + 3 turbines x 3.6MWm/3.6Mwe) and a total installed capacity of 61.4MWM/61.4Mwe within the boundaries of Balabanlı Neighborhood and Çevrimkaya Neighborhood of Muratlı District and Maksutlu Neighborhood of Çorlu District in Tekirdağ Province in Turkey.

Please see details of the project in the table below.

**Table 2-1: Details of Balabanlı WPP**

Land Use	Total Installed Capacity	Annual Production	Turbine Number	Turbine Installed Capacity	Date of License	Date of EIA Permit	Commissioning Date	Date of ESIA
Agricultural area	61.4MWm 61.4MWe	248.32	25	22 x 2.3 MWe 3 x 3.6 MWe	March 31 <sup>st</sup> , 2011	EIA is Affirmative 2009	2014 (22 turbine) Extension Phase I: 2017 (3 turbine)	1-Phase 1: 2013 (22turbine) 2-Phase 2: 2017 (10turbine)

The closest settlements to the project are Balabanlı neighborhood (1 km), Maksutlu neighborhood (2 km) and Çevrimkaya neighborhood (1.5 km). A general overview of the project is shown in the figure below.

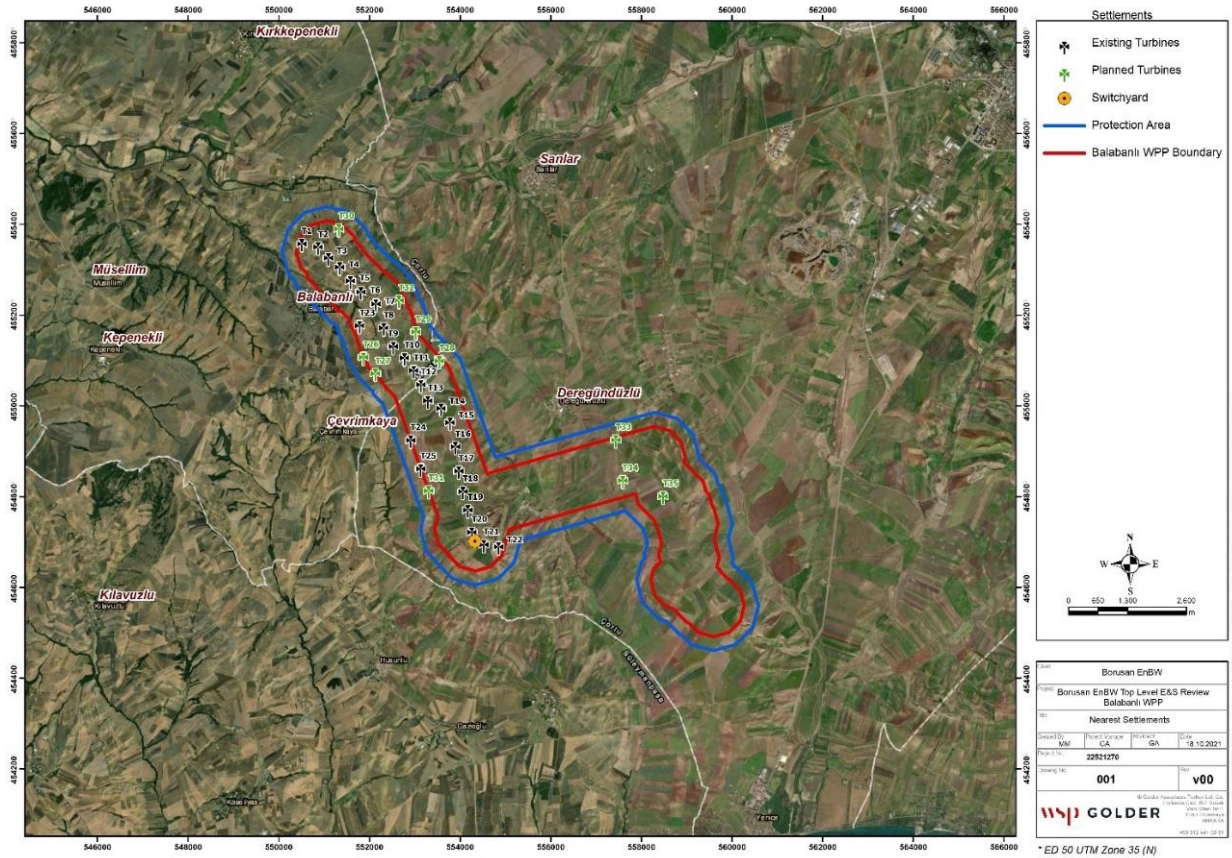


Figure 2-1: Balabanlı WPP and Extension Project General Overview

A capacity extension is planned for the Balabanlı WPP project. In scope of this extension, 6 turbines are planned to be constructed in the Project area. Net increase in installed capacity will be 35.4MWm/35.4 MWe. Construction of this extension project is started in March 2024.

Table 2-2: Details of Balabanlı Extension WPP

Land Use	Total Installed Capacity	Annual Production	Turbine Number	Turbine Installed Capacity	Date of License	Date of EIA Permit	Commissioning Date	Date of ESIA
Agricultural area	36MWm 36MWe	108.00	6	6 x 5.9MWm 5.9MWe	March 31 <sup>st</sup> , 2011	EIA is Affirmative 2021	Extension Phase II: 2025-2026	To finalized 2023-2024

### 3 Project Finance

The Balabanlı wind power plant is in operation with a total installed capacity of 61.4MWm/61.4MWe. The extension will be with a total installed capacity of 35.4MWm/35.4MWe.

The Project bank loan (37m USD) \* will finance up to 35.4Mwe/35.4MWm of extension of Balabanlı WPP. The Project bank loan (83 m USD) \* will finance up to 80Mwe/80MWm of extension of Pelit WPP.

Pelit WPP and Balabanlı Ext- Phase II WPP loan amount will be 120 m USD in total.



## 4 What Environmental and Social Studies Have Been Undertaken?

The Environmental Impact Assessment (EIA) of the Project was conducted in line with the Turkish EIA Regulation. According to the Environmental Impact Assessment Regulation (Official Gazette Date/Number: 17.07.2008/26939), wind power plants of any size are listed in Annex-I of the regulation, which requires the undertaking of an EIA process including a public consultation meeting. The EIA Regulation classifies projects into two annexes (Annex I and Annex II) based on the potential environmental impacts considering the Project's type, capacity, or location. Projects listed in Annex I are subject to a comprehensive EIA process and are required to prepare an Environmental Impact Assessment (EIA) report. In contrast, projects listed in Annex II are subject to selection-elimination criteria and are required to prepare a Project Description Document (PDD).

The evolution of Balabanlı WPP, along with the extension process to date, can be summarized as follows:

During the planning phase of the Project, the Project was planned 73 turbines with an installed capacity of 182.5MWm (73 x 2.5MWm). According to this, an "EIA" Report was prepared by Dokay Mühendislik in April 2009, and an "EIA Affirmative" decision was granted to by the Ministry of Environment and Agriculture (now the Ministry of Environment, Urbanization, and Climate Change ("MoEUCC") on September 2, 2009, for installing 73 turbines with an installed capacity of 182.5 MWm (73 x 2.5 MWm).

During the feasibility studies of the initial plan, the planned generation capacity was reduced from 182.5 MWm (73 x 2.5 MWm) to 50.6MWm/50.6MWe (22 x 2.3MWm/2.3MWe) due to the limit of TEİAŞ transformer connection capacity. Since the number of the turbines has been decreased and the turbine coordinates have been changed within the same project area, MoEU was notified about these revisions and an approval was obtained without preparation of a new PDD or EIA Report on May 28, 2013 with document No: 8796.

For this purpose, an ESIA report was prepared by AECOM in June 2013. Following commissioning, Balabanlı WPP began operating with 22turbines(T1-T22) in 2014 with an installed capacity of 50.6MWm/50Mwe.

Subsequently, a WPP extension was planned with the addition of 10 new turbines in two phases to that end, another ESIA report prepared by AECOM in July 2017 to cover this extension.

Also, a second "EIA" Report was prepared by EN-ÇEV Enerji Çevre Yatırımları ve Danışmanlığı Haritacılık İmar İnşaat A.Ş. in January 2021, and an "EIA Affirmative" decision was granted to by the Ministry of Environment and Urbanism (now the Ministry of Environment, Urbanization, and Climate Change ("MoEUCC")) on January 21, 2021, for installing 10 turbines with an installed capacity of 36MWm/35.4MWe.

The first phase of extension was completed, and 3 new turbines (T23-T25) were commissioned in 2017 with an installed capacity of 10.8MWm/10.5Mwe (61.4 MWm / 60.5 Mwe in total). However, the second phase of this extension plan was not advanced. In March 2020, 0.9 Mwe power was commissioned, bringing the total installed capacity of Balabanlı WPP to 61.4MWm/61.4 Mwe.

The second phase of extension will be additional 6 new turbines (T25-T31), the construction is started and will be commissioned in end of 2024 with an installed capacity of 10.8MWm/10.5Mwe (61.4MWm/60.5 Mwe in total).

Since the number of the turbines has been decreased and the turbine coordinates have been changed within the same project area, MoEUCC will be notified about the final revisions and an approval will be obtained without preparation of a new PDD or EIA Report for final status 96.8MWm/96.8Mwe (61.4MWm/61.4Mwe+35.4MWm/35.4Mwe) [(22 turbines x 2.3MWm/2.3Mwe)+ (3 turbines x 3.6MWm/3.6Mwe) + (6 turbines 5.9MWm/5.9Mwe)] of the Project.

An ESIA Package (Project Specific documents; Resettlement Action Plan, Human Right Impact Assessment, Biodiversity Management Plan, Traffic Management Plan, Emergency Response Plan, Invasive Species Management Plan) will be prepared by Mott MacDonald.

BEE commissioned a third-party Environmental and Social Due Diligence (ESDD) for the Project.

The Project has been designated as a Category B project by the EBRD's 2.9 Environmental and Social Policy as the potential E&S impacts associated with the Project are assessed to be limited and can be readily addressed and managed through the implementation of the Environmental and Social Action Plan (ESAP).

The potential environmental and social impacts/risks will be mitigated through careful design and implementation of effective measures. Project Non-Technical for a wide range of topics.

The potential environmental and social impacts are generally site-specific and can be avoided or mitigated by adhering to relevant Lenders' performance requirements, procedures, guidelines, and design criteria.

## **5 Scope of the Environmental and Social Due Diligence**

The scope of work for the ESDD comprised of the following:

- 1) Proposal of a categorization of the Project according to IFC PSs, EBRD PRs and EP IV, in accordance with the potential environmental and social impacts of the Project.
- 2) Key summary of the Project's environmental and social impacts and mitigation measures.
- 3) Evaluation of the Environmental and Social Management documentation prepared for the Project and Management System implementation.
- 4) Evaluation of the Project's compliance with IFC PSs, EBRD PRs, EP IV and Turkish legislation regarding to environmental, biological, and social components.
- 5) Review of stakeholder identification, analysis and engagement policy and practices relative to IFC PSs, EBRD PRs and EP IV.
- 6) An assessment of the environmental and social baseline data to ensure that they are robust enough to inform Project design decisions; and
- 7) Development of Environmental and Social Action Plan ("ESAP"): The ESAP sets out how the gaps identified in the previously prepared Environmental Impact Assessment ("EIA") & Environmental and Social Impact Assessment ("ESIA") reports and other environmental and social studies will be addressed and/or how the associated risks will be remedied.

The ESDD was conducted with environmental, social, health and safety, labor, biodiversity experts.

## **6 What are the key environmental and social impacts of the Project and the proposed mitigation measures?**

The following conditions were identified according to ESDD study.

- Project specific/interphase documentation needs to be developed to ensure the full implementation of the ESMS requirements during the Project activities.
- Additional assessments and baseline studies need to be conducted to comply with the Project Standards (noise/air measurements).
- Cumulative impact assessment should be conducted taking into account the nearby projects and cumulative impacts require careful mitigation due to presence of existing and planned projects.
- Additional assessment detailed below need to be conducted to comply with the Project Standards; Visual impact assessment, Shadow flicker assessment, Blade/Ice Throw Assessment, Operational Noise modelling, Climate Change Risk Assessment.

- BEE has a corporate Land Acquisition Plan however since these plans should be specific to reflect the project specific situation, Project specific Land Acquisition Plan and Livelihood Restoration Plan should be developed for the Balabanlı WPP Extension Project. Corporate Land Acquisition Plan and Livelihood Restoration Plan can be used as guideline while developing project specific plans.
- A Project-specific Stakeholder Engagement Plan in line with EBRD PR-10, IFC PS-1, EP-5, EP-6 and Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets should be prepared and should include and outline the existing documents and stakeholder engagement activities conducted.
- The corporate Social Responsibility and Community Development Plan should be implemented for the Balabanlı WPP Extension Project. Future corporate Social Responsibility initiatives should be closely monitored and planned to meet local preferences and needs. Any Social Responsibility Project carried out by BEE should be documented.
- BEE should engage with residents / landowners of the unauthorized cabins to provide information about potential hazards and impacts (e.g. noise, shadow flicker, ice throw), which involves communicating details regarding potential risks and their probable effects on individuals residing in the area.
- ERP and Risk Assessment in accordance with the "6331 numbered Occupational Health and Safety" law need to be developed and implemented for the Project.
- BEE will implement corporate ESMS documents across all its projects. Nevertheless, certain plans require project-specific updates. The listed plans below will be revised on a project-specific basis. All other ESMS elements will be implemented for the existing Balabanlı WPP and Balabanlı WPP Extension Project, with customization achieved through the use of forms and instructions included in the plans. Stakeholder Engagement Plan; Biodiversity Management Plan; Emergency Response Plan ("ERP"); Traffic Management Plan; Risk Assessment; OHS Plan; Land Acquisition Plan; Livelihood Restoration Plan; Resettlement Action Plan (if required).
- Additionally Human Rights policy will be developed and implemented for the existing Balabanlı WPP and Balabanlı WPP Extension Project.
- Lastly corporate Air Quality Management Plan will be updated to incorporate the GHG aspects. This updated plan will be implemented for both the existing Balabanlı WPP and the Balabanlı WPP Extension Project.
- The flora surveys indicated that there is no endemic specific within the Project Area. Given that flora surveys for the proposed WPP extension were conducted in January 2020, a less preferable period for flora assessment, it is advisable to undertake supplementary baseline biological surveys focusing on Potentially Biodiverse Features (PBFs) within the Project Area..
- Upon reviewing the reports derived from the fauna monitoring studies, it was noted that the essential studies and observations were conducted; however, there are some identified shortcomings. Notably, despite the presence of priority biodiversity features within amphibian and reptile categories, the mitigation and prevention studies section lack necessary information. Monitoring studies were conducted primarily during winter periods when these species are inactive, leading to difficulties in identifying individuals of certain species. It is evident that an updated set of surveys, particularly focusing on reptiles and tortoise species, is imperative, as there may be a need for translocation efforts prior to construction activities.
- Given the identification of tortoise species in the project area during the prior survey, it is crucial to initiate pre-construction survey programs under the guidance of an authorized fauna expert for the Balabanlı WPP Extension Project. Site clearance procedures must be ensured before commencing any earthwork associated with the construction, thereby safeguarding identified tortoise species and adhering to environmental conservation practices.



- Comprehensive field studies are imperative to ascertain the presence and population status of priority biodiversity features, aiming to establish a well-defined, study-based dataset for these species. Specifically, field surveys should be undertaken to assess the presence of small mammals, including bats, as well as large mammals, reptiles, and amphibians. These detailed studies will contribute to a more thorough understanding of the ecological dynamics and conservation needs of these important species.
- To address mitigation measures, it is essential to develop and implement a Biodiversity Management Plan (BMP), with a specific emphasis on reptiles and tortoise species. This targeted plan will ensure comprehensive and effective strategies to safeguard and manage the conservation needs of these reptilian populations.
- Additionally, there is a need for field studies to detect the presence of Critical Habitats (CHs) and the development of a detailed habitat map based on both desktop and field studies to validate the assessment. After detailed baseline studies Critical Habitat Assessment should be conducted for the Project using the findings of the additional biological field surveys.
- The Project currently lacks an invasive species assessment, and it is crucial to undertake an evaluation and develop a plan for monitoring and mitigating any residual impacts, including the potential introduction of invasive alien species.
- Due to the insufficient elements in the current site surveys for a comprehensive assessment of the Project's present situation, additional flora and fauna site surveys should be conducted. Following these surveys, an evaluation of the need for a Biodiversity Action Plan ("BAP") should be undertaken. Currently, assessing the need for a BAP is not possible, as no critical habitat assessment has been carried out at this stage. Therefore, Critical Habitat Assessment ("CHA") and Natural Habitat Assessment ("NHA") need to be performed for the Project.
- No desk study information has been provided for the Critical Habitats Assessment so this must be produced and an IBAT report procured.
- Although there is a carcass survey conducted for the existing Balabanlı WPP, the methodology for the carcass survey is not clearly outlined in the reports. The insufficient number of carcass survey days raises the possibility that scavengers may have contributed to the collection of carcasses. The carcass survey should be conducted based on the "Post-Construction Bird And Bat Fatality Monitoring For Onshore Wind Energy Facilities In Emerging Market Countries Good Practice Handbook And Decision Support Tool"<sup>14</sup>. This assessment should adhere to best practices, involving the systematic search and collection of carcasses, followed by a detailed species assessment. It must be applied to the whole WPP and the ETL.
- As per SNH (2017) guidelines, a comprehensive annual monthly bird survey program is mandated, closely adhering to the recommendations. It is recommended to schedule the next monthly bird monitoring studies between March and June for Balabanlı WPP Extension Project. This extended monitoring period should align with the previously mentioned recommendations, emphasizing the need to verify vantage point coverage of the site. Following the next bird monitoring study, the results should be evaluated in accordance with SNH guidelines. Subsequently, an assessment of the necessity for extended monitoring until December, spanning a full year, should be conducted.
- It was determined that bat monitoring studies were not carried out within the scope Balabanlı WPP Extension Project. These studies should be carried out based on Rodrigues, L. (2015)<sup>16</sup> in order to be considered to be EBRD PR6 / IFC PS6 guideline compliant for the purposes of international funding.
- The collision risk modelling should be updated after additional bird surveys have been conducted for the Balabanlı WPP Extension Project.
- It was also stated that there is an Aquila heliaca nest in the area. Therefore, these nest sites should be identified and monitored during the spring breeding period.

- Nests of the Eastern Imperial Eagle should be identified and monitored.
- A BAP should be developed and implemented and it should include the specific measures related to Eastern Imperial Eagle.
- Carcass survey should be conducted for the operation phase of the Balabanlı WPP Extension Project based on the "Post-Construction Bird And Bat Fatality Monitoring For Onshore Wind Energy Facilities In Emerging Market Countries Good Practice Handbook And Decision Support Tool.

## **7 How will BE communicate and engage with stakeholders?**

BEE considers stakeholder engagement (including dialogue, consultation, and the disclosure of information) to be a key element of Project planning, development, and implementation and are committed to a transparent and respectful dialogue with stakeholders. BEE mapped out the potential stakeholders and their interests and developed Corporate and Project Specific Stakeholder Engagement Plans. This will ensure regular engagement with the affected people and vulnerable people, wider communities, local/national government, and non-governmental organizations, and media to inform them about project activities, plans and developments on an ongoing basis, and gather any complaints or feedback.

## **8 How can stakeholders make a request, complaint or inquire?**

BEE has a Grievance Mechanisms procedure under Environmental Social Management System, which provide a process for all internal and external stakeholders to easily convey their complaints and suggestions and allows the Project to respond to and appropriately resolve the issues. Grievance procedures allow people to raise anonymous complaints if they wish to.

The internal and external grievances are always being registered.

You can raise requests, questions, feedback, and complaints through the contact details provided below.

The contact details for submitting grievances to BEE are provided below:

## BORUSAN ENBW ENERJİ YATIRIMLARI VE ÜRETİM A.Ş.

Pürtelaş Hasan Efendi Mah.Meclisi Mebusan Cad.No:35/37  
Salıpazarı / Beyoğlu İstanbul / Türkiye  
**Telephone :** (0212) 340 27 60

**Website:** [Borusan EnBW - İletişim](#)

You can raise requests, questions, feedback, and complaints through the website of the company.  
[Borusan EnBW - Paydaş Yönetimi ve Şikayet Mekanizması](#)

**Balabanlı WPP (Site):** Maksutlu Village/Tekirdağ

**Telephone- Balabanlı WPP (Site):** (0282) 261 91 49

**Community Liaison Officer (Site):** Yusuf BAL (Operation)

**Community Liaison Officer (Site):** Mustafa Şans (Construction)